



PRIVACY NOTICE - FOR SUITABILITY STATEMENT NOMINEES

This privacy notice is for people who have been nominated by applicants to provide their Suitability Statements. You do not need to set up an account/start a Suitability Statement to see what is involved. You can find Sample Suitability Statements on our website, which may help you in deciding whether or not to provide a Suitability Statement.

Whilst it is Clearing House policy to keep Suitability Statements confidential, due to data protection law this cannot be guaranteed. If an applicant requests a copy of a Suitability Statement we will contact you for your authorisation to release it. However, please assume that applicants may be able to see the Suitability Statement.

Our identity – We are the Clearing House for Postgraduate Courses in Clinical Psychology, a registered educational charity, and we are based at the University of Leeds.

Purpose of processing data – We provide an application service for clinical psychology course centres around the country. Your data is used for this service in the following 6 ways:

1. Your data is used by the Clearing House to collect and process Suitability Statements for people who are applying for clinical psychology training.
2. Your data is used by the Clearing House to manage your user account, including related purposes and contacting you where necessary.
3. Your data is retained and made available for: use in future Suitability Statements you may provide; use by the Clearing House to manage your user account; use by both the Clearing House and the Course Centres the applicant has applied to for the purposes of audit, research and service enhancement, results of which may be made public in anonymised form.
4. Your data is used by the Clearing House and the Course Centres the applicant has applied to to produce monitoring statistics which may be made public in anonymised form, including reporting and publishing data as required by relevant public bodies. The data may be used by the Clearing House to produce anonymised national monitoring statistics which we may circulate to all Course Centres.
5. Your data is used by the Course Centres the applicant has applied to in their selection process for clinical psychology training and for general administration purposes, including contacting you where necessary.
6. Your data is used by the Clearing House and Course Centres the applicant has applied to to contact third parties to verify the information provided in relation to the Suitability Statement, and those third parties may release personal data about you in the verification process.

See section (c) below for further details on all these items.

The purposes of data use may also be different for each Course Centre, and you should also check their privacy policy for more detail.

Lawful basis for processing data –

We rely on our legitimate interests as well as the legitimate interests of Course Centres to collect, process and share this personal data. These legitimate interests are to enable a single point of application for clinical psychology training, and therefore a single point for providing Suitability Statements. We consider that these beneficial services outweigh the low risks to a nominee of providing this data.

Providing us with your data – It is vital that you provide us with accurate and up-to-date information. If we or a Course Centre suspect incorrect data has been provided, Course Centres may share this with us and we may share it with other Course Centres. Failure to provide accurate data can mean that an applicant can no longer be considered by one or more Course Centres.

Your data protection rights – You have a number of rights in data protection law, should you wish to exercise them. These are as follows (but subject to a number of exceptions):

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- **Object to processing** of your personal information where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- And two rights which do not apply here – to **Request the transfer** of certain of your personal information to another party, and to **Withdraw your consent**.

If you would like to exercise any of these rights, please contact us and we will assess your request and respond to you (our contact details are at the top of the first page).

Data retention period – We retain your data for twelve years so that it is available for:

- use in any future Suitability Statements you are asked to provide;
- use by the Clearing House to manage your user account;

- use for audit, research and service enhancement by both the Clearing House and the Course Centres, including reporting and publishing data as required by relevant public bodies.

Course Centres may have their own retention periods, and you should see their privacy policy for further details.

Right to complain – If you are unhappy with how we have processed your data please contact us to discuss this with us (our contact details are at the top of the first page). You can also raise your concerns with the Information Commissioner (please see their website for more information: <https://ico.org.uk/>) or your local Data Protection Regulator if you are not in the UK, though they will expect us to try and resolve any issues with you directly first, so please do contact us first if you have any queries or concerns to enable us to do that.

(a) What personal data does the Suitability Statement involve and where does it come from?

We ask people who are applying for clinical psychology training to provide us with the names and work-based contact details of the people they nominate to provide Suitability Statements. Without these contact details it would not be possible to collect Suitability Statements to support applications.

We may also hold details of any process involved in collecting appropriate contact details e.g. email correspondence with the applicant regarding any difficulties in contacting you as their nominee; notes about any contact with yourself, the applicant or any third party relating to your contact details; etc.

As the nominee, you are asked to provide some basic additional information about yourself as part of the Suitability Statement, such as your job role (e.g. Senior Lecturer in Psychology). The additional information enables Suitability Statements to provide a more meaningful contribution to applications.

We hold information about your Suitability Statement to help us in processing it e.g. whether it has been submitted or not. We may also hold details of any process involved in collecting the Suitability Statement e.g. email correspondence with you about how to provide the Suitability Statement; notes regarding any contact with yourself; etc.

We only hold emails containing personal data for a maximum of 12 months e.g. emails related to Suitability Statements are deleted at the end of each application cycle.

(b) Who is your personal data made available to?

We collect basic information about you from the applicant who has nominated you to provide their Suitability Statement and we may share basic information with them to confirm your contact details. For more information about this please see Item 1 (section c.1) below.

We make the information provided by yourself and by the applicant who has nominated you available to the Course Centres the applicant has applied to for use for the purposes of audit, research and service enhancement, results of which may be made public in anonymised form. For more information about this please see Item 3 (section c.3) below.

We make the information provided by yourself and by the applicant who has nominated you available to the Course Centres the applicant has applied to to produce monitoring statistics. We may also produce anonymised national monitoring statistics which we circulate to all Course Centres. All these monitoring statistics may be made public in anonymised form, including reporting and publishing data as required by relevant public bodies. For more information about this please see Item 4 (section c.4) below.

We make the information provided by yourself and by the applicant who has nominated you available to the Course Centres the applicant has applied to for use in their selection process for clinical psychology training and for their general administration purposes, including contacting you where necessary. For more information about this please see Item 5 (section c.5) below.

Both the Clearing House and the Course Centres the applicant has applied to may contact third parties to verify the information provided in relation to the Suitability Statement, and those third parties may release personal data about you in the verification process. For more information about this please see Item 6 (section c.6) below.

Please see each Course Centre's individual website for up-to-date information about how the information provided in relation to Suitability Statements will be used by them. For details of the data protection and privacy policies of individual clinical psychology Course Centres, please contact them direct. You can find contact details for each Course Centre and links to their websites in the Courses section of our website.

(c) Purpose of data processing

Your data is processed in the following 6 specific areas. Further information is provided on each item below.

1. Your data is used by the Clearing House to collect and process Suitability Statements for people who are applying for clinical psychology training.
2. Your data is used by the Clearing House to manage your user account, including related purposes and contacting you where necessary.
3. Your data is retained and made available for: use in future Suitability Statements you may provide; use by the Clearing House to manage your user account; use by both the Clearing House and the Course Centres the applicant has applied to for the purposes of audit, research and service enhancement, results of which may be made public in anonymised form.
4. Your data is used by the Clearing House and the Course Centres the applicant has applied to to produce monitoring statistics which may be made public in anonymised form, including reporting and publishing data as required by relevant public bodies. The data may be used by the Clearing House to produce

anonymised national monitoring statistics which we may circulate to all Course Centres.

5. Your data is used by the Course Centres the applicant has applied to in their selection process for clinical psychology training and for general administration purposes, including contacting you where necessary.
6. Your data is used by the Clearing House and Course Centres the applicant has applied to to contact third parties to verify the information provided in relation to the Suitability Statement, and those third parties may release personal data about you in the verification process.

c.1 Item 1

Your data is used by the Clearing House to collect and process Suitability Statements for people who are applying for clinical psychology training.

Applicants for clinical psychology training need two Suitability Statements to support their application: one academic and one relevant experience. These Suitability Statements are collected and processed by the Clearing House and made available to the clinical psychology course centres the applicant is applying to. These Suitability Statements provide important information for assessing applications and, as such, it is in the interests of both the people applying and the Course Centres they are applying to for us to hold the data necessary for this process.

The information requested about you as someone nominated to provide a Suitability Statement is kept to a minimum, and is work-based rather than personal:

- We ask applicants for clinical psychology training to provide us with the names and work-based contact details of their nominees. Without these contact details it would not be possible to collect Suitability Statements to support applications.
- As the nominee, you are asked to provide some basic additional information about yourself as part of the Suitability Statement, such as your job role (e.g. Senior Lecturer in Psychology). The additional information enables Suitability Statements to provide a more meaningful contribution to applications.

c.2 Item 2

Your data is used by the Clearing House to manage your user account, including related purposes and contacting you where necessary.

The Suitability Statements you provide are managed through your account on our website. This keeps the data secure e.g. a password or secure link is required to access it.

The following are examples of how we use your data to manage your user account:

- We maintain your user account on our database so that you can login and use it to access your Suitability Statements throughout the application cycle.
- We respond to any enquiries you make e.g. if you request guidance on how to access a Suitability Statement, how to change your password etc.

c.3 Item 3

Your data is retained and made available for: use in future Suitability Statements you may provide; use by the Clearing House to manage your user account; use by both the Clearing House and the Course Centres the applicant has applied to for the purposes of audit, research and service enhancement, results of which may be made public in anonymised form.

We retain your data for twelve years so that it is available for the uses described above. The following are some examples of this:

- Application for clinical psychology training is very competitive: in recent years around 20% of applicants have been successful in gaining a place on a course. This means that people often apply more than once. Retaining the data allows you to have access to previous Suitability Statements which you can review and re-submit if the applicant re-applies and nominates you again.
- We maintain your user account on our database so that, for example, you can login each year to provide Suitability Statements, both new and updated (as above).
- Retaining the data for more than one application cycle allows both the Clearing House and Course Centres to audit processes and monitor the effect of changes across cohorts of applications. This can in turn be used to enhance the service provided

c.4 Item 4

Your data is used by the Clearing House and the Course Centres the applicant has applied to to produce monitoring statistics which may be made public in anonymised form, including reporting and publishing data as required by relevant public bodies. The data may be used by the Clearing House to produce anonymised national monitoring statistics which we may circulate to all Course Centres.

An example of this could be monitoring statistics on the success rates of applicants which could include data on various aspects relating to Suitability Statements. Some possible examples are as follows:

- whether Suitability Statements were provided or not;
- the job roles of the nominees providing Suitability Statements;
- how long the applicant had worked with the nominee; etc.

c.5 Item 5

Your data is used by the Course Centres the applicant has applied to in their selection process for clinical psychology training and for general administration purposes, including contacting you where necessary.

Once a Suitability Statement and/or the relevant application have been released to the Course Centres they are then available for that Course Centre's use as described above. For details of the selection process of each Course Centre please see the information each of them provides in the Courses section of our website and see the information they provide on their own websites. For details of the data protection and privacy policies of

individual clinical psychology Course Centres, please contact them direct. You can find contact details for each Course Centre in the Courses section of our website.

c.6 Item 6

Your data is used by the Clearing House and Course Centres the applicant has applied to to contact third parties to verify the information provided in relation to the Suitability Statement, and those third parties may release personal data about you in the verification process.

When an applicant submits an application they are asked to agree to the following declaration:

I certify that the information I have submitted in my Application as a whole is correct and complete to the best of my knowledge.

When they submit their Application they are confirming that the information they give is correct and complete. If the Clearing House or the Course Centres believe that they or any other person has given false information in their Application or in their Suitability Statements; has omitted any information requested in the Application, Suitability Statements, guidance, or on our website or our online application system; has omitted other material information; or has made any misrepresentation in the information given; we will take the necessary steps to check the authenticity of their Application. The Clearing House and the Course Centres reserve the right at any stage to ask the applicant, or yourself as their nominee, to give further details on any aspect of their Application or Suitability Statement e.g. proof of identification, status, academic qualifications etc. If satisfactory information is not provided within the given time period, or if any part of the Application or Suitability Statement is found to be fraudulent in any way, the Clearing House and the Course Centres reserve the right to cancel the Application and withdraw any offers.

The factual content of a sample set of applications may be checked and, as someone nominated to provide a Suitability Statement, you may be contacted on a random basis. For the purpose of preventing fraud, the Clearing House and the Course Centres reserve the right to disclose information on the Application or Suitability Statement to outside agencies e.g. universities, employers, the British Psychological Society, the Home Office etc. Fees paid for applications cancelled due to fraud are not refundable.