



PRIVACY NOTICE - APPLICANTS

You do not need to set up an account/start an application to see what is involved in applying. You can find a sample Application on our website, which may help you in deciding whether or not to register to start an Application:

<https://www.clearing-house.org.uk/applications/start-your-application>

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 multiple clinical psychology Course Centres around the country. Your data is used for this service in the following 8 ways:

1. The Clearing House shares basic information about you with your nominees to collect your Suitability Statements.
2. Your data is used by the Clearing House to process your Application and manage your user account, including related purposes and contacting you where necessary.
3. Your data is retained and made available for: use in future Applications you may make; use by the Clearing House to manage your user account; use by both the Clearing House and the Course Centres you are applying 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 you are applying 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 is used by the Clearing House to produce anonymised national monitoring statistics which we circulate to all Course Centres.
5. Your data is used by the Course Centres you have applied to in their selection process and for general student/staff administration purposes, including contacting you where necessary. If you accept a place at one Course Centre the other Course Centres you have applied to will be informed.
6. Your data is used by the Clearing House and Course Centres to contact third parties to verify the information, and those third parties may release personal data about you in the verification process.
7. Your data is used by the Clearing House to contact you about research/audit projects being conducted by third parties.

8. The equal opportunities data you provide is used by the Course Centres you are applying to in their selection process as permitted by the Equality Act. The data is used by both the Clearing House and the Course Centres you are applying to: to produce monitoring statistics, which may be made public in anonymised form, including reporting and publishing data as required by relevant public bodies; for the purposes of audit, research and service enhancement, results of which may be made public in anonymised form. The data is used by the Clearing House to produce anonymised national monitoring statistics which we circulate to all Course Centres.

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 details.

Lawful basis for processing data –

For items 1-6 above 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 a single point of information regarding the selection process for clinical psychology training. We consider that these beneficial services outweigh the low risks to an applicant of providing this data.

For item 7 above we ask for your consent to contact you about research by third parties.

For item 8 above relating to equal opportunities, this includes special category data. We therefore process your data on the following basis. See Item 8 (section c 8) below for more details):

- For monitoring/research/audit, on the basis of the legitimate interest described above plus Substantial Public Interest: Equality of Opportunity or Treatment;
- For use by the Course Centres in their selection process, on the basis of the legitimate interest described above plus we ask for your consent.

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. You should read the declaration in the Application carefully. Failure to provide accurate data can mean that your consideration as an applicant in one or more Course Centres is discontinued.

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. Please also see section a.1 below about your Suitability Statements.

- **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.
- **Withdraw your consent** where consent is required i.e. for item 6 and the relevant subsection of item 7 above. This enables you to withdraw your consent after you have granted it, if you change your mind.

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 applications you may make
- 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 to resolve any issues with you directly first, so please contact us first if you have any queries or concerns to enable us to do that.

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

When you complete your Application you provide us with the majority of the personal data we hold about you. For example, you provide:

- Personal details e.g. contact details, date of birth, nationality, language ability, etc.
- Information about your qualifications, including some documentation relating to these e.g. an academic transcript.
- Details of your work experience, and any other relevant experience.
- Contextual admissions information about your socio-economic background e.g. family university history, free school meals status, income support status etc.
- Equal opportunities monitoring information including special category data e.g. ethnicity, gender, age etc (please see section c.7 below for further information).

If you have already started or completed an Application you can check the information you have provided by logging into your application on our website:

<https://www.clearing-house.org.uk/>

If you have not started an application you can see the questions that are asked by downloading the Sample Application from our website:

<https://www.clearing-house.org.uk/applications/start-your-application>

We hold any hard copy documents you have posted to us in relation to your application e.g. you may have sent us a good quality photocopy of an academic transcript for us to scan.

We hold any email correspondence we have had with:

- yourself e.g. any enquiries you have made
- your nominees to provide your Suitability Statements
- the Course Centres regarding your Application

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

We hold information about your Application to help us in processing it e.g. whether the Application has been submitted or not, whether Suitability Statements have been submitted or not, notes of any correspondence with yourself about your Application, whether it has been released to the Course Centres or not, etc.

The Course Centres you have applied to update the status of your Application on our website as it progresses through their selection process. You can see the status they have recorded when you login to your Application on our website.

a.1 Your Suitability Statements

Your nominees provide data about you when they complete your Suitability Statements. You can see the questions that are asked in each Suitability Statement by downloading the sample Suitability Statement from our website:

<https://www.clearing-house.org.uk/applications/references-suitability-statements/choosing-who-nominate>

You have a right to access the data we have about you, but we have a duty of confidentiality to third parties which includes your nominees to provide your Suitability

Statements. So if you wish to see a copy of your Suitability Statements, we need to ask your nominees for their permission.

We suggest that, where possible, you discuss the Suitability Statement with the person who has provided it but if you want to request copies of your Suitability Statements from us, or see the other data we have about you, please contact us (our contact details are at the top of the first page). We will then send you details of our process.

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

We make basic information about you available to your nominees in order to collect your Suitability Statements. For more information about this please see Item 1 (section c.1) below.

We make the information provided by yourself and in your Suitability Statements available to the Course Centres you have 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 in your Suitability Statements available to the Course Centres you have applied to to produce monitoring statistics. We 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 in your Suitability Statements available to the Course Centres you have applied to for use in their selection process and for their general student/staff 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 you have applied to may contact third parties to verify the information provided by yourself and in your Suitability Statements. For more information about this please see Item 6 (section c.6) below.

We make the information provided by yourself in the equal opportunities section of your application available to the Course Centres you have applied to: for use in their selection process as permitted by the Equality Act; for the purposes of audit, research and service enhancement, results of which may be made public in anonymised form; to produce monitoring statistics, which may be made public in anonymised form, including reporting and publishing data as required by relevant public bodies. We also produce anonymised national monitoring statistics which we circulate to all Course Centres. For more information about this please see Item 8 (section c.8) below.

Please see each Course Centre's individual website for up-to-date information about how the information from your Application and 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:

<https://www.clearing-house.org.uk/courses/courses-z>

(c) Purpose of data processing

Your data is processed in the following 8 specific areas. Further information is provided on each item below.

1. The Clearing House shares basic information about you with your nominees to collect your Suitability Statements.
2. Your data is used by the Clearing House to process your Application and manage your user account, including related purposes and contacting you where necessary.
3. Your data is retained and made available for: use in future Applications you may make; use by the Clearing House to manage your user account; use by both the Clearing House and the Course Centres you are applying 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 you are applying 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 is used by the Clearing House to produce anonymised national monitoring statistics which we circulate to all Course Centres.
5. Your data is used by the Course Centres you have applied to in their selection process and for general student/staff administration purposes, including contacting you where necessary. If you accept a place at one Course Centre the other Course Centres you have applied to will be informed.
6. Your data is used by the Clearing House and Course Centres to contact third parties to verify the information, and those third parties may release personal data about you in the verification process.
7. Your data is used by the Clearing House to contact you about research/audit projects being conducted by third parties.
8. The equal opportunities data you provide is used by the Course Centres you are applying to in their selection process as permitted by the Equality Act. The data is used by both the Clearing House and the Course Centres you are applying to: to produce monitoring statistics, which may be made public in anonymised form, including reporting and publishing data as required by relevant public bodies; for the purposes of audit, research and service enhancement, results of which may be made public in anonymised form. The data is used by the Clearing House to produce anonymised national monitoring statistics which we circulate to all Course Centres.

c.1 Item 1

The Clearing House shares basic information about you with your nominees to collect your Suitability Statements.

To apply for clinical psychology training you need two Suitability Statements: one academic and one relevant experience. When we contact your nominees to request the Suitability Statements we will let them know your name and that the Suitability Statement is for your Application for clinical psychology courses. Your nominees also occasionally need additional information to correctly identify you so that they can provide the Suitability Statement e.g. if you have changed your name they may ask for your previous name, they may ask for your date of birth to identify your academic records, etc.

c.2 Item 2

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

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

- We maintain your Application and user account on our database so that you can login and use it throughout the application cycle.
- We email reminders about the closing date to people who have started an application.
- We respond to any enquiries you make about your Application e.g. if you request guidance on the questions in a particular screen.
- We may contact you to verify contact details for your Suitability Statements nominees.
- We check your Application to ensure that you have submitted certain key items and we may contact you if these items are missing.
- We check your Application to ensure that you have paid the processing fee and we may contact you about payment.
- We monitor the progress of your Application with each clinical psychology course centre.
- If you accept a place at a course we will let the other Course Centres know and any ongoing Applications you have with other courses will be cancelled.

c.3 Item 3

Your data is retained and made available for: use in future Applications you may make; use by the Clearing House to manage your user account; use by both the Clearing House and the Course Centres you are applying 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 start/submit an Application more than once. Retaining the data allows people to apply over several years (often including taking a break from applying for a while) and still have access to their previous Applications. This also allows your nominees to have access to previous Suitability Statements they have written for you.
- We maintain your user account on our database so that, for example, you can login and use it for new Applications.
- 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 you are applying 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 is used by the Clearing House to produce anonymised national monitoring statistics which we circulate to all Course Centres

An example of this is the Contextual Admissions section of your Application. We use the information you give to produce national monitoring statistics for all applicants and successful applicants, and for all applications and short-listed applications. We also produce monitoring statistics for each course centre for their applicants, their short-listed applicants and their successful applicants. We send each course centre their set of data and the national set of data after selection is complete.

c.5 Item 5

Your data is used by the Course Centres you have applied to in their selection process and for general student/staff administration purposes, including contacting you where necessary. If you accept a place at one Course Centre the other Course Centres you have applied to will be informed.

Once we have checked your Application, and we have received both of your Suitability Statements, we will release your Application and Suitability Statements to the Course Centres as soon as practical. It is then available for their 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:

<https://www.clearing-house.org.uk/courses/courses-z>

Also, as part of processing your Application, the Clearing House and Course Centres exchange data as necessary. For example:

- We monitor the progress of your Application with each clinical psychology Course Centre.
- If you accept a place at a course we will let the other Course Centres know and any ongoing Applications you have with other courses will be cancelled.

c.6 Item 6

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

When you submit an Application you 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 you submit your Application you are confirming that the information you give is correct and complete. If the Clearing House or the Course Centres believe that you or any other person has given false information in your Application or in your 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 your Application. The Clearing House and the Course Centres reserve the right at any stage to ask you to give further details on any aspect of your Application e.g. proof of identification, status, academic qualifications etc. If you do not provide satisfactory information within the given time period, or if any part of your Application is found to be fraudulent in any way, the Clearing House and the Course Centres reserve the right to cancel your Application and withdraw any offers.

The factual content of a sample set of applications may be checked and your nominees for Suitability Statements 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 your Application 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.

c.7 Item 7

Your data is used by the Clearing House to contact you about research/audit projects being conducted by third parties.

The Clearing House occasionally receives requests to contact applicants about research/audit projects being conducted by third parties (e.g. other clinical psychology Course Centres).

When you submit an Application you are asked for your consent for the Clearing House to contact you in this way.

This happens on an occasional basis e.g. once every few years, and the suitability of any project will be considered by the Clearing House Board before information is circulated. We will only send information to you about these projects if you give your consent when answering this question. Also, we will not release any of your data to those conducting the project unless you give additional consent for this. In other words we will not give your contact details to the project organisers; instead, we will send you details of the project and of how to contact the organisers if you wish to participate.

Examples of such projects are:

- a project on leadership development during clinical psychology training run by one of the clinical psychology programmes, which sought participation from those who accepted a training place at any clinical psychology programme that year.
- a project investigating the experiences of applying to clinical psychology doctoral training run jointly by the Division of Clinical Psychology's (DCP) Minorities Group and one of the clinical psychology programmes, which sought participation from people who had submitted an Application to any clinical psychology programme that year.
- a survey the Clearing House conducted seeking feedback about our website from people who had submitted an Application that year.

c.8 Item 8

The equal opportunities data you provide is used by the Course Centres you are applying to in their selection process as permitted by the Equality Act. The data is used by both the Clearing House and the Course Centres you are applying to: to produce monitoring statistics, which may be made public in anonymised form, including reporting and publishing data as required by relevant public bodies; for the purposes of audit, research and service enhancement, results of which may be made public in anonymised form. The data is used by the Clearing House to produce anonymised national monitoring statistics which we circulate to all Course Centres.

As with the data in the rest of your Application, we process your equal opportunities data on the basis of Legitimate Interest.

For the 3 items listed below we also apply the additional basis for processing of Substantial Public Interest: Equality of Opportunity or Treatment.

- We use the information you give to produce national monitoring statistics for all applicants and successful applicants, which we make public on our website: <https://www.clearing-house.org.uk/about-us/equal-opportunities>
Making this data public reflects the wish of the clinical psychology training community to be open about the data and to make it available to applicants and to others who may find it useful e.g. for research. Again, this data is anonymised so no applicant is identified, and we also group together some categories with small numbers to maintain anonymity.

- We use the information you give to produce national monitoring statistics for all applicants and successful applicants, and for all applications and short-listed applications. We also produce monitoring statistics for each course centre for their applicants, their short-listed applicants and their successful applicants. We send each course centre their set of data and the national set of data after selection is complete. Course centres may use this data: for audit, research and service enhancement; in reporting and publishing equality data as required by relevant public bodies for the purpose of ensuring equality of opportunity or treatment; etc. All this data is anonymised so no applicant is identified.
- Course centres are keen to ensure that their selection process does not involve any form of discrimination and that the successful group of applicants is representative of the general population. Once selection is complete, course centres may conduct research or an audit, re-checking their procedures using batches of applications where the equal opportunities information is known to those working on the project but not to the people assessing the applications. The data may be used in the year of entry, or in future years, to allow course centres to conduct projects across more than one cohort. Any research or audit will be subject to the usual approval process of the appropriate University and will be separate from selection, not only ensuring that selectors and those working on the project are different people but also removing identifying information from the data. The suitability of any project will be considered by the Clearing House Board, including consideration of the criteria for separation from selection.

For the following item, in addition to processing your equal opportunities data on the basis of Legitimate Interest, we also ask you for your consent. You will be asked to provide this in the Equal Opportunities section of your application.

- You are asked for your consent for the course centres you have applied to to have full access to the information you give in the Equal Opportunities section of your application. The information would not be anonymous and, if you give your consent, the course centres would have access to it both during their selection process and afterwards. As examples the course centres could make use of the data: during their selection process for the purpose of positive action; for audit, research and service enhancement; in reporting and publishing equality data as required by relevant public bodies for the purpose of ensuring equality of opportunity or treatment; etc. The data would be available to the course centres during this application cycle and in future years. We expect that all course centres will adhere to the requirements of both the Equality Act and Data Protection law in any use they make of the data.

For further information please see the Equal Opportunities page of our website:
<https://www.clearing-house.org.uk/about-us/equal-opportunities>