



## **UKCAT PRIVACY STATEMENT – 2010**

This policy applies to data collected by UKCAT in relation to its candidates during the 2010 testing round. This document has been produced in line with legal advice obtained by the UKCAT Board in July 2009 from Pinsent Masons LLP relating to data protection and student consent issues.

### **1. Introduction**

- 1.1. UKCAT is committed to achieving greater fairness in selection to medicine and dentistry and to the widening participation in medical and dental training of under-represented social groups. Through an ongoing programme of research, UKCAT is seeking to identify the characteristics in applicants which will make them good dentists and doctors and thus improve the quality of those who enter the professions with the ultimate aim of improving patient care.
- 1.2. UKCAT is a registered charity and private limited company managed by a Board elected from representatives of participating medical and dental schools (The Consortium). The Board is answerable to the Consortium which meets twice a year and currently comprises 26 institutions.
- 1.3. The test is delivered annually to approximately 24,000 candidates. The test is delivered by UKCAT's business partner, Pearson Vue (PV), on line at 167 PV test centres throughout the UK and worldwide in a further 64 countries. Candidates take the test prior to the completion of the UCAS admissions cycle. Candidate test results are passed to the medical and dental schools they apply to in order that test results might contribute to the admissions process.
- 1.4. UKCAT is registered as a data controller with the UK Information Commissioner's Office for the purposes of the Data Protection Act 1998. UKCAT is committed to ensuring that the personal data of candidates who take its test are handled in accordance with the Act.
- 1.5. Under the Data Protection Act 1998 (DPA) UKCAT is the data controller of data collected by PV on behalf of UKCAT. In line with the requirements of the act UKCAT has a written agreement with PV (The Professional Test Development and Delivery Services Agreement) which outlines PV's responsibilities in collecting, holding and transferring data on UKCAT's behalf.
- 1.6. UCAS is the data controller of data transferred to UKCAT regarding candidate choices, examination results and final destinations. The data obtained from UCAS is under licence, the requirements of which are observed by the Board of UKCAT in its use of the data. For clarity this precludes the transfer of these data to any third party.

- 1.7. Consortium members (Universities) are the data controllers for their own progression data. UKCAT holds an agreement with individual Universities regarding the provision and use of progression data.

## **2. Overview of Data**

2.1. The UKCAT database contains demographic, admissions and educational data on applicants to and medical and dental students registered at participating medical and dental schools in the UK. The data collected provide the UKCAT Consortium with an effective, reliable mechanism for:

- The administration of the test (i.e. to verify candidate details and to be able to communicate correct test results to participating medical and dental schools)
- The verification of the internal reliability of the test (i.e. is it a fair test and does it favour particular demographics of candidates)
- The establishment of the predictive validity of the test with regards to medical and dental schools performance
- The establishment of the predictive validity of the test with regards to postgraduate medical and dental performance
- Undertaking research related to admissions to medicine and dentistry that reflects the legitimate interests of UKCAT

2.2. The only data passed to medical and dental schools are test result data (including personal identifiers) which schools receive for those candidates who have applied to them through UCAS.

2.3. The only 'sensitive personal data' (as defined by the Information Commissioner) collected by UKCAT are ethnicity data collected at candidate registration as part of the socio-economic information. These data are used only to ensure that the test (including specific elements of the test) does not discriminate against or in favour of candidates from particular ethnic origins.

2.4. Progression data collected from medical and dental schools contain student identifiers to enable confirmation of matching. Once data have been matched to the UKCAT database the originals will be stored in a separate secure archive.

2.5. The UKCAT database utilises a unique identifier to enable matching and quality assurance by the Data Manager as well as ensuring that research and analysis conducted on the database is fully anonymised.

## **3. Research Protocol**

3.1. All studies carried out on UKCAT data will be approved by the UKCAT Board in advance. During the approval process, the Board will ascertain whether appropriate ethical approval has been obtained for the study in question.

3.2. UKCAT is committed to only publishing research/analysis where we are confident that individual candidates cannot be identified. Any articles/papers/documents for publication are scrutinized by the Board for this purpose.

3.3. Where research on UKCAT data has taken place and findings are being presented for publication (in whatever form), final approval of publications rests with the Board.

#### **4. Anonymity of Data**

- 4.1. Analysis and research on these data by or on behalf of UKCAT, is undertaken on anonymous data and used in the legitimate interest of UKCAT, typically relating to the reliability and validity of the test. Given these conditions UKCAT does not need to seek the individual consent of candidates to use their data as described in this document.
- 4.2. Names, addresses, postcodes, UCAS numbers, UKCAT numbers, secondary school names and codes and University codes are removed from data made available for analysis. Where necessary certain data may not be released if it could lead to the identification of individual candidates (such as gender, ethnicity and university of study combined).
- 4.3. Subject anonymity is preserved at all times in any analysis of UKCAT data. This applies both to individual participants or subgroups of participants from particular medical and dental school.
- 4.4. Original raw data are stored in a secure archive, in an encrypted form separate from the anonymised database.

#### **5. Database Security, Storage and Access**

- 5.1. UKCAT holds a Memorandum of Understanding (MOU) with a Data Manager responsible for the UKCAT database. The MOU notes that the data remain wholly in the ownership of the Board and that the Board retains all rights (including intellectual property) in the data. On the authorisation of the Board, the Data Manager may add data, undertake analysis of the data and publish research findings. The MOU specifies that the Data Manager must comply with the requirements of the Data Protection Act 1998 and put in place mechanisms to ensure the security of the data. The Data Manager may not, without the authorisation of the Board give copies of or allow access to the data to any third party or publish the data in any form.
- 5.2. Access to the database is currently restricted to the Data Manager and could only be expanded to other personnel at the request of the Board. In the event of the Board granting permission for other personnel to have access to the data to undertake research/analysis on its behalf, those individuals would be required to sign a Privacy Protocol which would outline the security measures UKCAT would expect the individual to put in place with regard to the storage of the data.
- 5.3. Once any research/analysis on the data is complete, data files are archived in accordance with scientific research guidelines.