

Privacy Notice for Work Placement Students

Your personal data

Westlands Primary School is committed to protecting the privacy and rights of anyone who shares their personal data with us. Under data protection laws, individuals have a right to be informed about how we use the personal data that we hold about them; privacy notices (sometimes called fair processing notices) are used to provide this information. Individuals can find out more information about the UK GDPR [here](#).

This privacy notice explains what personal information the Academy collects and holds about students undertaking a placement in the setting. It explains why we hold this information, what we do with it, how long we keep it for and if we share it with anyone else.

The Academy is the Data Controller; this means that we determine the purposes for which, and the manner in which, personal data relating to students is processed in order to comply with our legal and official functions as an employer and educational establishment.

A data protection representative for the Academy, Jon Taylor, can be contacted on 01782 973790 or headteacher@westlands.staffs.sch.uk in the first instance for any queries in relation to the processing of your personal data.

Staffordshire University Academies Trust has a Data Protection Officer whose role is to support the Trust and its' Academies with data processing practices. The DPO can be contacted on 01782 987120 or dpo@suatrust.co.uk.

The information you provide will be used in accordance with the Staffordshire University Academies Trust data protection policies can be found by accessing the Trust's website - <http://www.suatrust.co.uk/documents---policies>. Please note that this privacy notice may be updated at any time.

The personal data we process

The personal information that the Academy collects regarding students will be utilised to meet our statutory duties and to fulfil our purpose as a public sector organisation.

We process data relating to those who work within our Academy. Personal data that we collect, use, store and when appropriate, share, about you includes but is not restricted to:

- Name, address, date of birth, gender, contact telephone number and email address
- Vetting including DBS data
- Vehicle registration
- Emergency contact information
- Information relating to accidents and incidents on site
- Data relating to child protection and safeguarding incidents
- Student photos
- Monitoring data about your use of the Academy's information and communications system

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Data relating to disability, health records including medical conditions
- Criminal data, provided as part of our safer recruitment processes

Why we collect and use personal data

The personal information that the Academy collects regarding students will be utilised to meet our statutory duties and fulfil our purpose as a public sector organisation. By providing such data you will be helping us to:

- Comply with legal obligations to keep children safe in education;
- Ensure staff and children are safe in the workplace;
- Maintain security on the premises to safeguard staff and children;
- Meet health and safety obligations including ensuring that appropriate access arrangements can be provided for individuals who require them;
- Establish and maintain effective teaching and learning;
- Permit the placement to take place successfully and support students during their placement;
- Support the operational functioning of the academy under its requirement as a public body organisation.

The Academy collects information regarding students to adhere to safer recruitment requirements and safeguarding obligations.

DBS data will be verified on appointment of each student in accordance with the latest Keeping Children Safe in Education guidance. No copies of DBS certificates will be taken however verification of such checks will be recorded on the Academy's single central record.

To permit us to ensure that our safeguarding obligations are met, the Academy may also require student photos for identification badges.

You will potentially be providing the Academy with data which is specified under the General Data Protection Regulation as Special Category Data, which is data that could be considered particularly sensitive. This includes information about disability, health and access requirements where applicable, to ensure that appropriate access arrangements can be provided for students who require them. This data will be verified prior to appointment at the Academy where a student has particular health or access requirements that the Academy must support for the duration of the student's term. The Academy collects disability data to ensure that appropriate measures can be implemented to provide an accessible learning and working environment for all. Medical and health information will be collected from the student where it is relevant to their role at the Academy, to ensure that their safety and welfare can be supported and managed in the workplace.

The Academy collects information regarding its students to ensure that the safety of all students is maintained whilst under the employment of the Academy in accordance with the Health and Safety at Work Act 1974 and Managing Health and Safety Regulations 1999, including emergency contact information in case the student becomes unwell or is involved in an accident / incident, health information to ensure that risk assessments can be implemented as required to permit the Academy to control the risks to individuals, accident / incident reports to enable the Academy to report any accidents / incidents to the Health and Safety Executive in accordance with legal obligations under RIDDOR 2013.

Vehicle registration information may also be requested to enable the Academy to identify users of the car park and ensure the legitimacy of the use of the car park to help prevent accidents and incidents relating to parking, ensure sufficient parking spaces and ensure those who are authorised to access the car park, can.

The Academy collates information about student emergency contacts. It is the responsibility of the student to obtain consent from their emergency contact to provide this information. The Academy may share personal information about the student with their emergency contact and the medical services where there is an accident or incident requiring urgent response/medical care.

The Academy has Wi-Fi on site for use by students and where the use of WiFi is required for the student's work, will provide the student with the relevant login information.

Through use of the WiFi system the Academy requires students to adhere to the Acceptable Use Policy. We record the device address and will also log traffic information in the form of sites visited, duration and date sent/received. The purpose for processing this information is to provide you with access to the internet whilst visiting our site and to protect our systems and network from cyber security risks associated with third party devices.

Where we require your consent for collecting data, this will be specified on the form for the request of data. Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Whilst the majority of personal information you provide to us is mandatory, some of it may be requested on a voluntary basis. In order to comply with the UK GDPR, we will inform you at the point of collection, what information is needed whether consent is required to provide this information and who you should speak with if you have any queries about sharing information with us.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information. If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations.

Our lawful basis for using this data

The data of students is essential for the Academy's operational use to facilitate safeguarding practices and ensure that it can provide appropriate care and support in the workplace.

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Comply with a legal obligation (Article 6(1)c)
- Carry out a task in the public interest (Article 6(1)e)
- Legitimate interest (Article 6(1)f)

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way (Article 6(1)a)
- We need to protect your vital interests, or someone else's vital interests (Article 6(1)d)
- As a recognised legitimate interest under the Data Use and Access Act

We collect data which is specified under the UK General Data Protection Regulation as Special Category Data, known as data that could be considered particularly sensitive. This means that, under the UK GDPR, we have obligations to keep this data secure and use it where:

- We have explicit consent (Article 9(a))
- Where we need to protect the vital interests of an individual (Article 9(c))
- We have a legitimate interest as a not for profit organisation (Article 9(d))
- For the safeguarding of children and individuals at risk (Paragraph 18, Schedule 1, Data Protection Act 2018)

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the Academy's use of your data.

Collecting student information

Students' personal data will be sought from the data subject themselves. Third parties will be contacted to obtain personal data with the data subject's consent, unless the Academy has a legal basis for doing so. The University may be contacted to obtain personal information regarding the data subject, to enable the Academy to fulfil its' legal duty of safeguarding and ensure that students who are placed with us are supported throughout their placement.

Student data is essential for the Academy's use to ensure site safety and safeguarding requirements are met. In order to comply with UK GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this.

Storing student data

We hold data throughout your period of your term and in accordance with our data protection policies. Personal information that is no longer needed, or has become inaccurate or out of date, is disposed of securely. We will retain this file and delete the information in it in accordance with our Retention and Records Management Policy.

Your data will be stored securely within our internal network, management information system and filing system.

The Academy will not share your personal information with any third parties without your consent, unless the law allows us to do so. Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information.

Who we share information with:

Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:

- Our local authority, Staffordshire County Council
- The Department for Education
- Your university
- Your family - to support your health and welfare in the event of an emergency or ill health at work
- Ofsted
- Suppliers and service providers, including professional bodies, professional advisers and consultants – so that they can provide the services we have contracted them for.
- Our auditors.
- Website and social media – where you have consented to the sharing of your information here.

Rights of individuals

The UK-GDPR gives you certain rights about how your information is collected and used. This includes the right to the following in certain circumstances:

- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.
- To be informed about the collection and use of your personal data – this is called 'right to be informed'.
- To ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request, data subject access request or right of access request.
- To ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- To ask us to delete your personal information – this is called 'right to erasure'
- To ask us to stop using your information – this is called 'right to restriction of processing' i.e. permitting data to be stored but not processed any further.
- To object to processing of your information.
- To withdraw consent at any time (where relevant).

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- The right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- The right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- The right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.
- The right to access shall be subject to the relevant exemptions. **This includes where a reference is received or provided and marked as a confidential reference. The reference which is given or received shall be exempt from issue in response to a subject access request where this is given in confidence.**

If you want to request access to the personal information we hold about you, please contact Jon Taylor (headteacher@westlands.staffs.sch.uk).

If you are concerned about the way we are collecting or using your information, please raise your concern with the Academy's DPL in the first instance. You can also contact the ICO at <https://ico.org.uk/concerns> or via the following means:

- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

How to withdraw consent and lodge complaints

Where our Academy processes your personal data with your consent, you have the right to withdraw your consent at any time.

If you change your mind or are unhappy with how our school uses your personal data, you should let us know by contacting the Data Protection Lead. We take any complaints about our collection and use of personal information very seriously.

Updating this privacy notice

We may need to update this privacy notice periodically if we change how we collect and process data. The Academy will inform you when this privacy notice has changed; however, we also recommend that you revisit this privacy notice periodically.

How can you find out more information?

If you would like to discuss anything in this privacy notice, please contact our Data Protection lead or visit our website at <https://westlands.staffs.sch.uk/>.