

## **PRIVACY NOTICE (TIER 4)**

### **WORK EXPERIENCE PLACEMENTS**

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#### **1. Scope**

This privacy notice covers all data subjects (students and work experience placement providers) whose personal data is collected in the provision of work experience placements to students who attend Vision Academy Learning Trust schools. This privacy notice is in line with the requirements of the General Data Protection Regulation (GDPR).

#### **2. Responsibilities**

- 2.1** The Data Protection Officer / Trust Compliance Manager is responsible for ensuring that this notice is made available to data subjects prior to Vision Academy Learning Trust collecting/processing their personal data.
- 2.2** All Employees/Staff of Vision Academy Learning Trust who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

#### **3. Privacy notice**

The Vision Academy Learning Trust is a group of secondary and primary schools with a common aim to inspire the imaginations of our students and to support them to develop in ways which stand them in good stead for their future lives and responsibilities as individuals, employees and citizens.

- Vision Academy Learning Trust is a company limited by guarantee registered in England.
- Company Number: 10249712
- Registered Office: Egglecliffe School, Urlay Nook Road, Egglecliffe, Stockton-on-Tees, TS16 0LA
- ICO Registration Number ZA194005

Our Data Protection Officer can be contacted directly here:

- [dpo@valt.org.uk](mailto:dpo@valt.org.uk)
- 01642 051020

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The personal data we would like to collect from/process about students and work experience placement providers is as follows:

| Data Ref | Personal data type:   | Source <i>(where Vision Academy Learning Trust obtained the personal data from if it has not been collected directly from you, the data subject.):</i> |
|----------|---|--|
| 1        | Student personal information – names, form class  |  |
| 2        | Placement provider personal information – employee names, non-generic work email address, non-generic work telephone number |  |

The personal data we collect will be used for the following purposes:

| Data Ref | Personal data type:   | Purpose of processing   |
|----------|---|---|
| 1        | Student personal information – names, form class  | To support student learning<br>To monitor and report on student progress<br>To safeguard students on work experience providers premises |
| 2        | Placement provider personal information – employee names, work email address, work telephone number | To support student learning<br>To monitor and report on student progress<br>To safeguard students on work experience providers premises |

Our legal basis for processing for the personal data is as follows:

Note: “Article” refers to the section of the General Data Protection Regulation under which lawful processing is permitted.

| Data Ref | Personal data type:   | Legal Basis   |
|----------|---|---|
| 1        | Student personal information – names, form class  | <ul style="list-style-type: none"> <li>• <b>Article 6(1)(c) - legal obligation</b><br/>Education Act 1996 Section 507B – responsibilities in relation to the education or training of 13-19 year olds.</li> <li>• <b>Article 6(1)(c) - legal obligation</b><br/>Keeping children safe in education. July 2015 (Statutory Guidance from Dept. of Education) Sections 86 – 144)</li> <li>• <b>Article 6(1)(d) – to protect the vital interests of the data subject</b></li> </ul> |
| 2        | Placement provider personal information – employee names, work email address, work telephone number |   |

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**The legitimate interests pursued by us are as follows:**

Note: “Article” refers to the section of the General Data Protection Regulation under which lawful processing is permitted.

| <b>Data Ref</b> | <b>Personal data type:</b>  | <b>Legitimate interests</b>  |
|-----------------|---|--|
| 2               | Placement provider personal information – employee names, work email address, work telephone number | <b>Article 6(1)(f) – legitimate interest</b><br>Vision Academy Learning Trust has a legitimate interest in processing personal data during the work experience process and for keeping records of the process. Processing data from work experience placements allows us to manage the administration and evaluation of the work experience process, and to maintain relationships with work experience providers in order to provide opportunities for future placements. |

### 3.1 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Vision Academy Learning Trust to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

**The personal data that requires your consent for processing is as follows:**

| <b>Data Ref</b> | <b>Personal data type:</b>  | <b>Purpose of processing where Article 6(1)(a) – consent is explicitly required</b>  |
|-----------------|---|--|
| 2               | Placement provider personal information – employee names, work email address, work telephone number | We will contact placement providers periodically to maintain our relationship and request opportunities for future placements. |

Consent for the above personal data is given at the time of collecting the information on the Work Experience Employer Form.

You may withdraw this consent at any time by completing a **Withdrawal of Consent Form** *GDPR REC 4.6D*.

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### 3.2 Disclosure

The following third parties will receive your personal data for the following purpose(s) as part of our routine processing activities:

| Data Ref | Personal Data Type  | Name of Third Party  | Purpose of processing   |
|----------|---|--|---|
| 1        | Student personal information – names, form class  | Hartlepool College of Further Education (HCFE) Middlesbrough   | Vision Academy Learning Trust will supply work experience placement providers to be Health and Safety vetted. This vetting will also include checks to ensure that safeguarding is in place to include the completion (verification and new) of enhanced DBS applications where appropriate. The list of employers for vetting will be shared securely with HCFE. |
| 2        | Placement provider personal information – employee names, work email address, work telephone number | College Stockton 6 <sup>th</sup> Form College<br>Prior Pursglove College<br>Other Colleges to which pupils apply | HCFE create electronic records of placement providers and risk assessments. This data is processed in line with the GDPR.   |

### 3.3 Retention period

Vision Academy Learning Trust will process personal data for the duration that students attend secondary school and/or Sixth Form College. We hold student data in the form of secure paper and electronic records and store the personal data according to the Information and Records Management Society Information Management Toolkit for Schools.

| Ref | Personal data type:   | Retention Period  |
|-----|---|---|
| 1   | Student personal information – names, form class  | Total retention period - Date of Birth of the pupil + 25 years (Limitation Act 1980 (Section 2) |
| 2   | Placement provider personal information – employee names, work email address, work telephone number | Date of last student placement + 3 years  |

### 3.4 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

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- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Vision Academy Learning Trust refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.5 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.2 above) in the processing of your personal data.

To make a subject access request access, use the form **GDPR\_REC\_4.2**.

### 3.5 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Vision Academy Learning Trust (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Vision Academy Learning Trust’s Data Protection Officer.

The details for each of these contacts are:

|                 | <b>Supervisory authority contact details</b>  | <b>Data Protection Officer (DPO) contact details</b>                              |
|-----------------|---|---|
| Name:           | Information Commissioners Office  | Mrs A Sotheby   |
| Address line 1: | Information Commissioner's Office<br>Wycliffe House, Water Lane<br>Wilmslow, Cheshire, SK9 5AF        | Egglescliffe School, Urray Nook Road,<br>Egglescliffe, Stockton-on-Tees, TS16 0LA |
| Email:          | <a href="https://ico.org.uk/global/contact-us/email/">https://ico.org.uk/global/contact-us/email/</a> | dpo@valt.org.uk   |
| Telephone:      | 0303 123 1113   | 01642 051020  |

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#### **Document Owner and Approval**

The Data Protection Officer / Trust Compliance Manager is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the Vision Staff SharePoint and is published on [www.valt.org.uk/privacy](http://www.valt.org.uk/privacy).

Signature: A. Sotheby

Date: 25/01/2022

#### **Change History Record**

| Issue | Description of Change | Approval   | Date of Issue |
|-------|-----------------------|------------|---------------|
| 0.1   | Initial issue         | R Pascoe   | 24/10/18      |
| 1     | Publication           | S White    | 06/11/18      |
| 2     | Change of DPO         | A Sotheby  | 04/11/19      |
| 3     | Review/ Reformat      | A. Sotheby | 30/04/2020    |
| 4     | Review                | A. Sotheby | 25/01/2022    |