



## **Petty Pool Privacy Notice**

Petty Pool takes the protection of your personal information very seriously. For the purposes of the Data Protection Act the data controller is Petty Pool. Our ICO registration is: **ZA300185**. The following statements outline the data we collect and why and who this may be shared with.

### **Data We Process – Students**

#### **Student information (including Potential Student)**

We will collect and process your name, address, date of birth, gender, nationality, parent/guardian contact names, phone number, email address, learner support needs, medical information, education history, qualifications, references, ethnic origin, employment history, attendance data, and other relevant information for the purposes set out below.

#### **Application to Petty Pool Vocational College**

We will use your details for the fulfilment of the College's contractual relationship with its Students and for our public task to deliver education's programme, this includes to determine and apply admissions criteria, process applications for admission, and monitor overall Learner numbers.

We will ask for details of any criminal convictions or offenses. We do this to identify any students who may need additional support and in some cases review whether a student may pose a risk to the safety or security of other students, teachers or our premises. In some cases, in partnership with Cheshire College South and West we may reject a student's application due to a disclosure but this is rare and we have a panel that would meet to review each case before this decision is made. If a student declares a criminal record or a DBS reveals a criminal record which is likely to cause the student to be unable to complete some mandatory element of the course, a place cannot be offered. This data is kept securely and separate from general learner records and is only available to identified staff from the safeguarding team. If you don't provide information about a criminal conviction or offense and this is later disclosed to us it may result in removal from a specific course or exclusion from the College.

Parents/guardians, Schools, Colleges, Local Authorities, Youth Support and associated services may contact us to request that we confirm the status of a Student's application and the course they have applied for. We will share this information unless you inform us not to, please contact the Admin office to inform us not to share.

#### **Student performance and attendance at Petty Pool Vocational College**

We will use your details to fulfil our learning agreement with you and for our public task to deliver education's programmes. We will use your information for setting assessments, marking/grading assessments, reviewing marks/grades awarded in response to notifications of mitigating circumstances, conducting meetings of examination boards, determining awards and classifications.

We will use the information gathered to identify support needs and any required reasonable adjustments. Where appropriate support plans will be negotiated with the Learners and shared with identified staff to inform teaching and support strategies. We will receive Educa-

tion, Health and Care Plans and other educational and/or medical documentation from parents, schools, health professionals and local authorities and will identify staff who these will need to be shared with.

To enable Petty Pool to fully support Learners they may actively contact parents and other relevant professionals to make a request for information relating to educational support needs. These will be shared with staff to help inform support plans. These plans will be shared with identified staff.

It is college policy that staff may contact named parents/guardians of students under the age of 18 during their course to discuss academic progress, attendance, welfare concerns and conduct. Students who do not wish Petty Pool to make such contact may be granted an exemption by writing to the Director of Student Services before the start of their course.

### **Work Experience Placements**

We will process Learners' name, date of birth, parent's details, emergency contact details, course details and any health, well-being and educational needs so that we can facilitate a work experience placement. We will use this information to confirm student placement details with their parent and the employer. We will also use the details to conduct risk assessments on placements and monitor attendance.

We will share this personal data with the prospective work experience employer. We also share your name, course details and work experience details with our provider of independent advice and guidance partners.

### **Student Health and Social Care Information**

Petty Pool will also ask for information about health problems, such as allergies, conditions such as asthma or diabetes. We will use this information to cater for special dietary needs, and for health and safety reasons including prior to taking student on an off site visit or residential and as part of pastoral duties. We also ask for information about your religion to help facilitate beliefs. This information will be used to inform support plans which will be shared with the appropriate staff.

We may share this personal data with third parties such as another College where a student is taking part in activities. Where appropriate we will ask for explicit consent to process this information; however, we may also rely on other legal basis to process this information including processing the data to protect the students or another individual's vital interests.

### **References**

Petty Pool may share personal details including name, attendance details, courses completed and results with Local Authorities, other providers and/or employers on receipt of a reference request.

### **Transport**

We share and confirm your name, address and contact details with our transport providers. We collect this data to ensure the safe arrival of all our students. For example, we may contact you or your parent/guardian in the event of some disruption to services or due to an emergency, bad weather or accident.

## **CCTV and Images**

Petty Pool uses CCTV on its premises and will also collect your photograph for the purpose of identifying and protecting our students, visitors, staff and premises. This data may be shared with the Police and other agencies where the charity is required or permitted to do so by law.

Your photograph or video may also be taken and used as part of promotion of Petty Pool events or activities taking place at the College. You will be asked for your consent at the start of each year for photographs or video being taken so you can refrain from being included if you wish to.

## **Data We Process – Parent/Guardians information**

We require students to provide parent/guardian name, email and phone number. We collect this information to support the communication with potential students during the application process and to keep you informed about your child's performance and attendance, the Education Health Care Plan reviews as well as general activities of Petty Pool. We will also use this

## **Data We Process – Job applicants, current and former employees**

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for but it might affect your application if you don't.

### **Application stage**

We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our HR officer will have access to all of this information.

You will also be asked to provide equal opportunities information. This is not mandatory information – if you don't provide it, it will not affect your application. This information will not be made available to any staff outside of our HR officer, including hiring managers, in a way which can identify you. Any information you do provide, will be used only to produce and monitor equal opportunities statistics.

### **Shortlisting**

Our hiring managers shortlist applications for interview. They will be provided with your name or contact details.

Candidates are asked to provide proof of identity and qualifications at the interview. Photocopies of original documents are only retained if the candidate is successful.

If you are unsuccessful for the position you have applied for, your data will be held for a period of six months in case of any queries regarding the outcome or for feedback purposes.

### **Conditional offer**

If we make a conditional offer of employment, we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and assess suitability for the role.

You will therefore be required to provide:

- Proof of your identity – you will be asked to attend our office with original documents, we will take copies, if not already provided.
- Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies, if not already provided.
- You will be asked to complete a criminal records declaration to declare any criminal convictions.
- We will require you to complete an application for a Criminal Record check via the Disclosure and Barring Service – you will be asked to attend our premises with original documents, we will take copies, if not already provided.
- We will contact your referees, using the details you provide in your application, directly to obtain references
- We will also ask you to complete a questionnaire about your health, which may, if necessarily be reviewed by our Occupational Health Unit. This is to establish your fitness to work.

Upon commencement of your employment, we will also ask you for the following:

- Bank details – to process salary payments
- Emergency contact details – so we know who to contact in case you have an emergency at work
- Employment status for tax code purposes
- CV – to provide information to Cheshire College South and West as part of contract with them

Our contract of employment requires all staff to declare if they have any potential conflicts of interest, other employment or engagement. We also require you to show us information from the DVLA on an annual basis as you are driving Petty Pool vehicles. If you complete a declaration, the information will be held on your personnel file.

## **Data We Process – Volunteers**

Petty Pool will collect and record you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for information in support of your application. We will also keep on file proof of your identity e.g. original documents such as passport or driving licence and proof of qualifications. You will be asked to complete a criminal records declaration to declare any convictions. We will also ask about any disability, health issue or factor which may affect your ability to work with us as a volunteer.

If you are driving Petty Pool vehicles we ask for a copy of your driving licence for our insurance purposes.

## **Data We Process – Petty Pool Outdoor Education Service**

As visiting schools we collect information from you about the visiting child/children and other parents/carers and emergency contacts. This will include name, address, contact details and any medical issues including medication, allergies and dietary information. We process this information for fulfilment of our contract with you for delivering outdoor education.

We will ask for your consent to take photographs of child/children and for your consent to share these on our website, on social media and in any communications or promotional materials.

We are required by law to share personal information with the relevant local authority safeguarding boards in the event of any safeguarding concerns.

### **Use of Data Processors**

Data processors are third parties who provide elements of our services for us. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will hold it securely and retain it for the period we instruct.

### **International Transfers of Data**

Visitors to our outdoor centre for our international programmes e.g. residential or exchanges will send us information from overseas (this can include outside of the European Economic Area). Information including: name, address, date of birth or age, emergency contacts, and other relevant information may be shared with staff and Rotary partners. The information will also be passed to the host school/College/education provider and a host family (where relevant). Staff and participants will be asked to give their explicit consent to the sharing of data.

### **Storing data**

We store data electronically on our own system or via our management information system school pod, SAGE etc. We also keep personal information in paper files and also keep copies of students work.

We also post photographs and videos of students, staff and visitors on our facebook page, you tube channel and other social media and use photographs in case studies and promotional materials.

### **Retention of Records**

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

As a general guide:

- Students (including parent/carer) details: will be retained for 6 years after completion of studies or withdrawal from a course. In some cases for example to comply with UK or European funding rules we are required to keep records for much longer.
- Volunteer data: is generally retained for 6 years after the volunteer has finished working with us
- Employee data: all data will be retained for 6 years with limited data retained until the employee's 75<sup>th</sup> birthday (as required for pension administration)

Petty Pool has a Retention Schedule which specifically sets out detailed retention time-scales. For more information on how long information will be retained please contact our Data Protection Officer.

## **Your Rights**

Data Protection law provides the following rights for individuals:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erase
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

You may ask us at any time for information about any personal data we hold about you, or you may request that we correct or delete that information. Where you ask us not to contact you again or to delete information we may need to retain limited information to respect those wishes.

Where we are relying on your consent as a condition for processing your personal data you may revoke your consent to the processing of your data by contacting us.

We may disclose your personal information in circumstances where we have reason to believe that disclosing this information is reasonably necessary to comply with the law or we have another legal basis to do so.

### **Complaints or queries**

Petty Pool tries to meet the highest standards when collecting and using personal information. If you want to make a complaint about the way we have processed your personal information, please contact our Data Protection Officer: [Mary.watt@pettypool.org.uk](mailto:Mary.watt@pettypool.org.uk)

In the event you are not satisfied with the use of your personal data you have the right to contact the data protection regulator, the Information Commissioner's Office (ICO) <https://ico.org.uk/>

### **Changes to this Statement**

Any changes we may make to our privacy policy in the future will be posted on this page.

## Appendix one

### Privacy Notice How we use student information - summary

The categories of your information that we collect, hold and share include:

- Personal information (such as name, student number number and address)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Assessment information
- Medical information
- Education and Health Care Plan information
- Support requirements

### Why we collect and use this information

We use the data:

- to support your learning
- to monitor and report on your progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing

### The lawful basis on which we use this information

We collect and use student information under We collect the following personal data under GDPR Article 6c (Legal Obligation), and 6e (Public Task) in order to meet our legal obligations with the ESFA and Local Authorities. They are also necessary in order for us to carry out our public task to provide education and training.

## Collecting student information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

## Storing your data

We store your data electronically on our own system or via our management information system school pod. We also keep your personal information in paper files and also keep copies of your work.

We hold student data for six years after you have left.

We also post photographs and videos on our facebook page, you tube channel and other social media and use photographs in case studies and promotional materials.

## Who we share your information with

We routinely share information with:

- Cheshire College South and West as the operating College
- your local authority
- the Education and Skills funding agency
- Awarding bodies

## Why we share your information

We do not share information about you with anyone without consent unless the law and our policies allow us to do so.

We share data with Cheshire College South and West, Local Authorities and the Department for Education (DfE) on a statutory basis. This data sharing underpins funding and educational attainment policy and monitoring.

We will also share certain information about pupils aged 16+ with our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- post-16 education and training providers
- youth support services
- careers advisers

For more information about services for young people, please visit our local authority website.



## Requesting access to your personal data

Under data protection legislation, parents and students have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact our data protection officer.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, please raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## Contact

If you would like to discuss anything in this privacy notice, please contact:  
mary.watt@pettypool.org.uk