# Admissions & Placements Service

## Privacy Notice

**This Privacy notice is intended to inform you how the St Piers' Admissions & Placements Service (ELS) will use the personal data of young people applying to attend St Piers School or College.**

If you have any queries or concerns, further guidance is available from, the Admissions & Placements team or the Data Protection Officer using the details provided.

## Information Governance standards

**Please find below details of the standards Young Epilepsy meets when using personal data**

### Data Protection

Young Epilepsy/St Piers (St Piers) endeavours to meet the highest standards when collecting and using personal information. We are are committed to upholding the standards and regulations embodied in the Data Protection Act 2018 (DPA 2018) and the UK General Data Protection Regulation (UK GDPR). Personal data will therefore at all times be:-

- ✓ Processed lawfully, fairly and in a transparent manner;
- ✓ Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- ✓ Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- ✓ Accurate and, where necessary, kept up to date;
- ✓ Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; and
- ✓ Processed in a manner that ensures appropriate security.

St Piers will furthermore:-

- ✓ Be responsible for, and be able to demonstrate compliance with the DPA 2018 and the UK GDPR.

### Individual Rights

Under the DPA 2018 and the UK GDPR you have the right to:

- Be informed (the purpose of this Privacy Notice);
- Access your information;
- Rectify inaccurate or incomplete data;
- Request the erasure of your information;
- Restrict how your data is processed; and

- To object to the use of your information.

There are two additional rights about automated decision making and data portability. With regard to these St Piers will not use student information for automated decision making or profiling and will not undertake data portability.

Should you wish to exercise any of your Rights, please contact the DPO using the contact details provided.

### Further information

Your information is held in a confidential manner with limited access, in accordance with the DPA 2018 and the UK GDPR. We are committed to ensuring that personal data is secure. In order to prevent unauthorised access or disclosure, data will be held on secure servers/cloud storage, and we have also put in place appropriate physical, electronic and managerial safeguards to further protect hard copy records.

St Piers uses some cloud-based software, such as Microsoft Office 365. Depending on the service used, Microsoft may process and store data outside of the UK, such as in America or the European Economic Area. To safeguard this transfer of information overseas we rely on Microsoft's contractual commitments in its Data Protection Addendum, to process data only as instructed and to support UK specific safeguards.

Other than this, information will only be processed overseas if there is a specific request for us to do so. In such instances, this will be done in accordance with the DPA 2018 and the UK GDPR and under the guidance of the DPO and the IT department.

If you have any queries about how St Piers uses personal data, please contact the

- Admissions and Placements team

  E. education@stpiers.org.uk

- Data Protection Officer:

  T. 01342 832243 ext. 286

  E. sturner@youngepilepsy.org.uk or dpo@youngepilepsy.org.uk

St Piers and Young Epilepsy are registered with the Information Commissioner's Office (ICO) under our legal name of the National Centre for Young People with Epilepsy. Our registration number is Z5611618.

Please note that should you be unhappy about the way we implement data protection you have the right to lodge a complaint with the ICO https://ico.org.uk/

## Caldicott Principles statement

At St Piers we apply the Caldicott Principles to health and social care data, so that every flow of identifiable confidential information is regularly justified and routinely tested against the principles developed in the Caldicott Report.

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| Principle 1 | Justify the purpose(s) for using confidential information. |
| Principle 2 | Only use it when necessary. |
| Principle 3 | Use the minimum that is required. |

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| Principle 4 | Access should be on a strict need-to-know basis. |
| Principle 5 | Everyone must understand his or her responsibilities. |
| Principle 6 | Understand and comply with the law. |
| Principle 7 | The duty to share information can be as important as the duty to protect patient confidentiality. |
| Principle 8 | Inform potential students and service users about how their confidential information is used |

### Data Security & Protection Toolkit

As an NHS Business Partner, St Piers also completes the NHS' Data Security & Protection Toolkit, which enables organisations to measure and publish their performance against the National Data Guardian's ten Data Security Standards.

All organisations that have access to NHS patient data and systems must use this toolkit to provide assurance that they are practising good data security and that personal information is handled correctly.

### Amendments

We may update this privacy notice from time-to-time by posting a new version on our website. You should occasionally check these pages to ensure you are aware of the changes. For more information about how the privacy notice is changed please contact the DPO using the details provided.

## Privacy Notice

### Information kept by St Piers.

St Piers may keep the following personal data and special categories of personal data relating to potential students:-

- ✓ Personal details;
- ✓ Educational information;
- ✓ Medical, therapy, psychology and health information;
- ✓ Safeguarding information;
- ✓ Social care information.

### Family information

Where it is pertinent to the application of your young person, we will also keep some information on you and on other members of your family. For example, the family's medical history may be kept, where it relates to your young person's health. This is extremely helpful to us, but if you do not want this information kept, please inform of us this immediately.

### CCTV.

We have a small number of CCTV cameras on campus, for security purposes, such as by Facilities area where our minibuses are kept. All CCTV usage is approved by the Exec Lead, in accordance with the ICO's Code of Practice. Where there is CCTV there will be signage indicating its use. CCTV recordings are kept for seven days, unless an incident has been highlighted, in which case the CCTV will be kept until the incident is resolved.

### Anonymised information.

We may also use anonymised information about the education/ care/treatment of our potential students for research (subject to Research Ethics approval) or for audit purposes. It may also be used to provide training or for presentation outside of St Piers. Please be assured though that in these situations the information is fully anonymised so that it is not possible to personally identify your young person.

## What this information is used for.

The information we hold on potential students is used to assess their suitability for a placement at St Piers' School or College. Holding all relevant information enables us to determine whether we can meet the needs of the young people who are applying to become students.

Both the information we receive from other people/organisations and the information generated by our staff will be used with your funding authority/authorities, as part of the process to secure financial support for the placement with us. .

## Source of the personal data

In order to effectively assess your son/ daughter it is essential that we have all pertinent information. This may involve obtaining information from the following sources:-

- The young person;
- Parents, family and friends of the young person;
- The funding authority/authorities;
- The referring authority;
- Former placement providers, such as previous residential placements or schools attended;
- Local service providers, such as your young person's school, therapists and CAMHS team;
- Health providers including both primary and secondary care; and
- The individuals or organisations whose contact details you have provided us with, on our application form.

The personal data will also have been generated by our staff team (for example reports and correspondence). The records generated by our staff team will often be multidisciplinary and may involve staff from Education, Health, Therapies or Residential services.

## Sharing information.

St Piers may share data as outlined below, for all other disclosures of information consent will be sought on an individual basis.

## Routine sharing

In order to assess the appropriateness of the placement and to secure funding for it, St Piers will routinely disclose correspondence, reports and information with the following people/ organisations:-

- All professionals involved in funding the placement, which may include Local Authorities, Social Care and Health Commissioners;
- The individuals or organisations whose contact details you have provided us with, on our application form;
- Your young person's Social Worker;
- Local service providers such as your young person's school, GP Surgery, Hospital, therapists and CAMHS team;
- Other Health professionals involved with your young person's care including their GP, any local consultants and, if appropriate, the Patient's Child & Adolescent Mental Health Services team;
- Individuals who have parental authority, such as parents, guardians or carers. (Both parents will be given information unless we have been informed that parental responsibility rests solely with one.)

This sharing is for the benefit of your young person as it helps provide a comprehensive understanding of his/her needs and development and also allows for all those involved in their care and treatment to be aware of the young person's development and assessment whilst using the Assessment Service.

## Inspections/Audits

St Piers is subject to a number of audit requirements and regulatory standards, such as the CQC, Ofsted, HMRC etc. and may therefore allow its records to be inspected as part of those processes, to ensure that St Piers is meeting the necessary standards. Inspectors/auditors will be given access to records but only provided with copies in exceptional circumstances, for example, if a safeguarding concern is identified or it is necessary for audit completion.

## Legal obligations

We are also legally obliged to share certain information and, in such cases, will not seek your consent to do so. For example, all safeguarding concerns must be disclosed to the relevant organisations and individuals, such as the Local Authority, your young person's Social Worker and possibly the police. Similarly, we will also share certain information with new placement providers, such as a summary chronology of all safeguarding incidents and if your young person is a Looked After Child (LAC) then his/her Care Plan, Personal Education Plan and the minutes of LAC meetings.

## Data Processors

We use data processors; this is an organisation responsible for processing personal data on behalf of St Piers. It does so under strict instruction from us and our contract ensures that the standards required by St Piers, the DPA 2018 and the UK GDPR are upheld at all times.

Some data processors use anonymised personal data for their specific reasons, such as statistical, quality control, security, research or other purposes. Where this occurs, we can confirm the data is always anonymised and students cannot be identified from it.

An example of a data processor is the software that runs our Management Information System for students and potential students. In order to utilise this software, we have to upload and record information.

The growth in cloud technology means that it is likely that the use of data processors will become more common. If you wish to know who our current data processors are please contact the DPO using the details provided.

### Use of Artificial Intelligence (AI) technology

AI offers the opportunity for Young Epilepsy to enhance support and efficiency. This may include, but is not limited to, using AI, such as CoPilot, to transcribe meetings, summarise documents/notes and draft communications and documents. All AI generated work is reviewed and approved by staff who must ensure that it meets our own standards.

To minimise risks AI technology can only be used by staff if it: complies with UK GDPR and the DPA 2018; and has been assessed and approved using our AI Data Protection Impact Assessment. Personal data will not be shared with AI technology that uses data to train and learn, unless there is specific agreement to do so.

### Complaints/Reviews

Records may also be accessed by independent reviewers, such as when a complaint or other issue is independently investigated.

### Anonymisation

Some of the information we hold on our potential students may be anonymised, so that we can share the results more widely. Your young person will not be identifiable in these records.

## Retention of records

St Piers keeps records for different periods depending upon the nature of the record and its value. The retention periods detailed below have been agreed by the organisation and accord with relevant legislation, guidance and legal opinion.

The records held by the Education Liaison Service team will usually only be held for one year after a placement has either not been offered, has been declined or for which funding has been refused. However, if an appeal is made, then the records will be retained for one year after the appeal process has been exhausted.

If your young person becomes a St Piers student then these records will form part of their student record and will be held and used in accordance with the privacy notice for student records. A detailed copy of St Piers' student records retention schedule is available upon request.

### CCTV.

CCTV recordings are kept for seven days, unless an incident has been highlighted, in which case the CCTV will be kept until the incident is resolved.

## Lawful basis

The DPA 2018 and the UK GDPR require us to have a lawful basis for processing personal data and these are outlined below. The primary basis we seek to rely on is consent, however, there are other additional lawful bases, which are detailed below.

### Consent/Explicit consent

Having outlined how we will use, keep and otherwise process your young person's data we would ask you to consent to this using the form below. Please note that the privacy notice covers the use of data that is essential to the application process.

### Legal claims and obligations

Where the processing is necessary to establish, defend or exercise legal claims or where ordered by a court or tribunal.

### Legal and regulatory requirements

St Piers complies with other regulatory and legislative requirements, which may also provide a lawful basis for using and retaining your data, such as the requirement to keep financial records for seven years and to comply with the Statute of Limitation.

### The legitimate interests of St Piers.

It is in St Piers' legitimate interests to process some student data for administrative and management purposes. This may include allowing staff access to your young person's data, such as our admin teams and using student data to measure the ethnic diversity of our student group

### Medical purposes.

For example, for preventive medicine, for a working capacity assessment, for medical diagnosis or the provision of health or social care. For example, we may share personal data about your young person's medical history when making a referral to another medical professional.

### Public Interest

Where the processing meets one of the 23 conditions set out in Schedule One, paragraphs 6-28 of the DPA 2018

### Public health

Where the processing is necessary for public health monitoring and statistics; or responding to new threats to public health, such as epidemics/pandemics.

### Historic value

St Piers is an important and specialist charity that dates back over 100 years, so some records, are permanently preserved for their historic value. For example, if your young person has their photo on one of our publications, then that document may be permanently retained.

# Parental consent

*After reading the information provided on this form, please consider the following statements and only tick the appropriate box.*

☐ YES, I do consent to my young person's personal data being processed as detailed above;

☐ NO, I do not consent to my young person's personal data being processed as detailed above.

*If this is the case, then please detail below your concerns or any restrictions or modifications that you would like put in place. Our staff team will then contact you to discuss whether these can be accommodated.*

| | | |
|---|---|---|
| (Signature) | (Name) | (Date) |

| | |
|---|---|
| (Name of potential student) | (Relationship to the potential student) |

If you should change your mind about this consent form then please contact the Admissions and Placements team either through the main switchboard on 01342 832243 or by emailing education@youngepilepsy.org.uk

## Communications with parents

If you are interested in the activities we undertake and would like to receive our newsletter or know more about our events and challenges, campaigns, training and conferences, the research we undertake or volunteering opportunities, please complete go to our website for further information or contact our Fundraising team via the main switchboard.