



PRIVACY NOTICE FOR TRAINEES

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, our trainees, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

This notice applies to current and former trainees.

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

B) TYPES OF DATA HELD

We keep several categories of personal data on our trainees in order to carry out effective and efficient processes. We keep this data in a file relating to each trainee and we also hold the data within our computer systems, for example, our transport system.

Specifically, we hold the following types of data:

- a) personal details such as name, address, phone numbers and any other contact details
- b) name and contact details of your next of kin
- c) your photograph
- d) your gender, marital status,

- e) information of any disability you have or other medical information
- f) information on your race and religion for equality monitoring purposes
- g) information from social services, including care packages
- h) bank details relating to direct payments

C) COLLECTING YOUR DATA

You provide several pieces of data to us directly during your time at Sunnyside

In some cases, we will collect data about you from third parties, such as the social work team, families, carers and so on.

Personal data is kept in files or within the Organisation's HR and IT systems.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement or in order to effectively manage the service we provide to you, including ensuring all your needs are met.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Carry out the trainee contract that we have entered into with you to ensure we support you with your health and social care needs.	Performance of the contract
Maintaining comprehensive up to date records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in the event of an emergency are maintained	Our legitimate interests
Ensuring our administrative and IT systems are secure and robust against unauthorised access	Our legitimate interests
Review systems	Our legitimate interests
Transport systems	Our legitimate interests
Gaining medical input and advice, when making decisions about your support needs, including knowledge of and administration of medication	Our legitimate interests
Safeguarding	Performance of the contract
Complaints	Performance of the contract
Multi disciplinary team work	Our legitimate interests

E) SPECIAL CATEGORIES OF DATA

Special categories of data are data relating to your:

- a) health
- b) sex life
- c) sexual orientation
- d) race

- e) ethnic origin
- f) political opinion
- g) religion
- h) trade union membership
- i) genetic and biometric data.

We carry out processing activities using special category data:

- a) to carry out care and support effectively

Most commonly, we will process special categories of data when the following applies:

- a) you have given explicit consent to the processing
- b) we must process the data in order to carry out our legal obligations
- c) we must process data for reasons of substantial public interest
- d) you have already made the data public.

F) FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract of service with you. This could include being unable to offer you a trainee placement.

G) CRIMINAL CONVICTION DATA

We will only collect criminal conviction data where it is appropriate given the nature of your situation and where the law permits us. This data will usually be collected at the transition into SRT, however, may also be collected during your time at SRT. We use criminal conviction data to determine your suitability, or your continued suitability for your placement. We rely on the lawful basis of legal obligation to process this data.

H) WHO WE SHARE YOUR DATA WITH

Staff within our organisation who have responsibility for service management of data and the carrying out of the service will have access to your data which is relevant to their role. All staff with such responsibility have been trained in ensuring data is processing in line with GDPR.

We do not share your data with bodies outside of the European Economic Area.

I) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

J) RETENTION PERIODS

We only keep your data for as long as we need it for, which will be at least for the duration of your time with us though in some cases we will keep your data for a period after your placement has ended. Some data retention periods are set by the law. Retention periods can vary depending on why we need your data, as set out below:

Record	Statutory Retention Period
Children/young adults	Until the child reaches 21
Retirement Benefits Schemes	6 years from the end of the scheme year
Statutory Maternity Pay (calculations, certificates, medical evidence)	3 years after the end on the tax year in which the period ends
Wage/salary (overtime, bonuses, expenses)	6 years
National Minimum Wage	3 years after the end of the consequent pay reference period
Working hours	2 years after they are made

Record	Recommended Retention Period
Assessments from social work team	7 years after end of placement
trainees files, reviews, about me forms, general data	7 years after end of placement
Information from families/other carers	7 years after end of placement
Information from medical professionals	7 years after end of placement

K) AUTOMATED DECISION MAKING

Automated decision making means making decisions about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

L) TRAINEE RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. More information on this can be found in the section headed "Access to Data" below and in our separate policy on Subject Access Requests";
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

M) CONSENT

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

N) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

O) DATA PROTECTION COMPLIANCE

Our Data Protection Officer is:
Service manager
01442 863364

Privacy Notice written April 2018

Review due bi-annually – April 2020