

## Central Placement Organiser Data

The information below sets out the considerations that central placement organisers need to take into account when processing data. The information is useful in that it provides an insight into how such organisations comply with the legislation; moreover, the information highlights how review data is held.

<b>Placement Provider Data</b>	
<b><i>Company vs. Individual Data</i></b>	In deciding whether personal data is being processed, especially where comments or opinions are made, reference to companies is not considered within the Act unless a connection can be made between the data and the individual. So comments about 'the supervisor' or the '.....department', may still be personal data if a person could be identified from the comments. Special consideration should be made for data held on companies with only a few employees or sole traders.
<b><i>Personal Data and Sensitive Personal Data</i></b>	Consent must be sought from the placement provider to hold personal data. Care will need to be taken if the ethnicity of the workforce is recorded by the Work Experience Co-ordinator, in such a case explicit consent must be given. Consent <b>must</b> be obtained separately.
<b><i>Student and Teacher Feedback on Placement Providers</i></b>	Data subjects have the right under Principle 6 to prevent processing that is likely to cause damage and/or distress.  It is not recommended that Learner Feedback Forms or their equivalent be retained by an agency, as they are the property of the home learning base/school and/or the learner. However, where these are analysed for quality control purposes, care should be taken that personal data is not recorded. Any forms retained containing inappropriate personal data should be destroyed.
<b><i>Accident Reporting</i></b>	RIDDOR reporting by employers is covered by statute which is one of the exemptions, which permit the processing of personal data and sensitive personal data.

## Retention of Data

The Data Protection Act requires that data is held only as long as necessary. For learner data this could be held by a central placement organiser e.g. WEXA pending a possible placement post 16. For central placement organiser data this could be held against a possible future placement. The provider would need to justify for each record why it was still being held even though there was no current placement activity.

## **Deletion of Data**

When data is no longer relevant it is recommended that paper records be shredded in accordance with Principle 7 to prevent the data being used unlawfully.

## **Learner Data**

Home learning bases/schools/School Governors/Local Authorities require learner records to be held for up to eight years. Where paper evidence of the learner's work experience, is held by a central placement organiser e.g. WEXA, it will be returned to the home learning base/school for storage.

## **Security**

The Data Protection Act requires that measures be taken to prevent data from being accidentally damaged or lost or processed unlawfully. This includes:

- the necessity of having an adequate backup facility for electronically stored data;
- having an effective password regime in place for access to computer databases;
- access to backup media is secure;
- physical building and room security is secure by the appropriate use and control of keys to doors, cabinets etc.