

Data Protection Guidance for Home Learning Bases/Schools and Work Experience Co-ordinators

This section is aimed at enabling home learning bases/school and Work Experience Co-ordinators to sensibly organise the confidential data that they will be working with on a daily basis.

Learner Data	
<i>Home learning base/school data</i>	The home learning base/school should seek the explicit consent of parent(s)/carer(s) to pass on personal data and sensitive personal data concerning the learner to the employer and/or central placement organiser. This must be done as part of the learner's application form.
Work Experience Data Protection Consent Forms	Data Protection Consent Forms or an equivalent should give, in writing, reasons why each specific piece of data is required. The information should explain: <ul style="list-style-type: none"> • the data; • the purpose of obtaining the data; • what data is passed on to the placement provider. Signatures of parent(s)/carer(s) and learners should be obtained so that explicit consent is given. Any unsubstantiated information (hearsay etc) about a learner, obtained from any source should not be held or passed on.
<i>Bulk Learner Data e.g. SIMS</i>	Care should be taken in passing on personal learner data to a central placement organiser e.g. WEXA or LEBC
<i>Parent(s)/Carer(s)/Learner Agreement/Consent Form</i>	Home learning bases/schools may consider including sensitive data as well as personal data on the agreement/consent form so that parent(s)/carer(s) /learners are fully informed of the data held and what has been passed on to the placement provider.
<i>Relevant data</i>	Information passed on to placement providers must be relevant. In particular, the need to pass on the learner's home address should be carefully considered in the view of safeguarding considerations. The type of information which is passed on should be reflected in the consent form.
<i>Placement Provider Agreement/Consent Form/Letter of Understanding</i>	The Form must explain to the placement provider that permission has been given for the personal data and the sensitive data to be passed on. This form must also make reference to the confidential nature of the information and the need to

	adequately secure and store the data.
<i>Placement Provider Feedback to Learner</i>	A form of this type may include sensitive personal data on the learner and therefore, must be given to the learner or returned to the home learning base/school. It must not be passed to a third party.
<i>Accident Reporting</i>	RIDDOR reporting by employers is covered by statute which is one of the exemptions, which permit the processing of personal data and sensitive personal detail, but care should be taken when recording and reporting an accident to the respective Local Authorities.
<i>Student/Teacher feedback on Learning Providers</i>	Care needs to be exercised in reporting back on placement providers where the ethnicity etc of the workforce is noted by the learner/teacher. In this case, explicit consent must be given.
<i>Security</i>	The Data Protection Act requires that measures be taken to prevent data from being accidentally damaged, lost or processed unlawfully. It is essential that adequate backup facilities for electronically stored data are in place. Physical security of buildings, rooms, cupboards etc with appropriate control in the form of keys needs to be robust.

The approach to data protection should be a common sense approach. The test when considering data protection is for the Work Experience Co-ordinator to put him/herself in the position of the data subject and consider if the processes, procedures, storage, facilities, security measures and communication procedures are proper and reasonable.

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Below is an aide memoir that summarises the main activities to be completed. The aide memoir does not have to be completed for every learner. A Work Experience Co-ordinator may wish to photocopy the aide memoir and use it when batch placements are organised. If an individual is new to the role of Work Experience Co-ordinator, s/he may wish to use the aide memoir for each placement being organised.

Has the following been done by the:

Work Experience Co-ordinator

Has a Data Protection Consent form or equivalent been signed by the learner and his/her parent(s)/carer(s) and been returned to the home learning base/school?	<input type="checkbox"/>
Is the data to be passed to the placement provider: (i) accurate (ii) up-to-date (iii) appropriate for purpose	<input type="checkbox"/>
Has bulk data passed via SIMS or other MIS systems been scrutinised by the home learning base/school's Data Controller before being passed on to the Learning Provider?	<input type="checkbox"/>
Has the placement provider (i) been informed that the learner data must be stored safely? (ii) stated how the data will be safeguarded and who will act as Data Controller? (iii) been informed that child protection takes precedence over Data Protection principles?	<input type="checkbox"/>