PRIVACY POLICY AND GDPR STANDARDS

This document outlines how PPA uses information and stores data. This includes data and informing concerning anyone who works with us, studies with us, collaborates with us, or is involved with one of our events or facilities.

1. Introduction

While it is necessary to collect some data on our staff and students in order to be able to carry out the required function of an educational institution, we never sell or give away information to third parties for any commercial purposes. All the information collected is solely for the general function of PPA.

The information we collect helps to adapt to the needs of the student body, and to understand which policies and procedures are working, and which need improvement.

---

2. Data Uses of PPA Students and Staff

This section shows (1) how data is used for people with different professional, educational and public relations to PPA, (2) our reason for collecting this data, and (3) what legal basis we have for doing so.

Prospective students

- Your name and contact details, which may include IP addresses. Details of attendance at open days and records of communication/correspondence.
- To send you our prospectus and supplementary information related to your enquiry.
- Public Task.

Students applying for a place at PPA

- Your contact details (name, address, phone number(s), email), date of birth, gender, ethnicity, religion, relevant health or disability information, next of kin, details of your previous education and qualifications, financial information including funder information, ID/passport, visa or immigration information if you are a non-UK citizen. This may also include information around criminal offences.
- Verification checks, service planning, equalities monitoring, DBS clearance is required.

- Public Task. Where special category data is involved: explicit consent processing is necessary for reasons of substantial public interest.

Current students

- In addition to the above two categories, we hold information about your course, classes and attendance, exam results, placements, accommodation. As well as information relating to academic offences including disciplinaries and investigations. We may also process health information about you, for example in relation to mitigating circumstances or where adjustments are required. You will be given a student number which our staff will use to identify you. Your personal data may also be captured on video and/or audio during the recording of lectures and other more general pedagogic purposes. Course information, placement, results data. Attendance and results/progress data.
- For educational purposes, student support, extracurricular activities, work placements, volunteering, accreditation, registration, and sponsorship requirements.
- Public Task, legitimate interests.

Graduated students

- Your degree details, your next employment, education or training. Your contact details/historic pattern of engagement.
- To provide a reference for you if you ask us to. To provide information to authorities or professional bodies that seek necessary data about you.
- Public Task.

Prospective staff

- Contact details, education, qualifications and work history, address, contact details, date of birth, ethnicity, religion, health, disability. ID/passport, visa or immigration information if you are a non-UK citizen. This may also include information around criminal offences.
- Application and recruitment purposes, equalities monitoring.
- Public Task.

Current staff

- As above, job title, hours and pay, training undertaken whilst at PPA, holiday information. Financial information (bank details) tax and NI information. Appraisal data. We may also process health information about you, for example in relation to sickness absence or where adjustments are required. Health condition and disabilities.
- Performance and development, payroll and budget, occupational health, workplace assessment.
- Consent and Public Task.

Past staff

- Above information from the staff record.
- For reference purposes, evidence for financial purposes. Where legitimately requested by official bodies.
- Public Task; legal obligation.

---

3. Data Uses of Public Users of PPA Facilities and Events

This section shows (1) how data is used for members of the public who attend PPA events or use PPA facilities, (2) our reason for collecting this data, and (3) what legal basis we have for doing so.

CCTV

1. Video footage of individuals on campus.
2. The police, courts and similar formal bodies.
3. Legitimate interest.

Venue hire

1. Contact details, financial information.
2. The police, courts and similar formal bodies.
3. Contractual obligation.

External businesses and partners

1. Contact details, educational information
2. The police, courts and similar formal bodies.
3. Contract, and/or legitimate interest.

Attendees of events

1. Contact details, medical information
2. The police, courts and similar formal bodies.
3. Legitimate Interests. Where special category data is involved: explicit consent.

---

4. Data Protection and Privacy Laws

The main laws are the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). We also adhere to the duty of confidence and the Human Rights Act (Article 8).

For electronic communications, including email and cookies, we comply with the Privacy and Electronic Communications Regulations (PECR).

---

5. Sensitive Information

The GDPR defines some types of information as special category data because it is more sensitive. We must have an additional lawful basis to process special category data.

For educational purposes:

The lawful basis we rely on is 'substantial public interest on the basis of union or member state law'.

For academic research:

All our research is done in the public interest, therefore, where our research involves special category data, we will rely on one of the public interest lawful bases to process special category data, in addition to the lawful basis of 'public task' for general processing.

For some courses, we need to know about criminal offences (including spent convictions) because the course includes a placement working directly with children or vulnerable adults. We will comply with Schedule 1 of the Data Protection Act 2018 and the Rehabilitation of Offenders Act (Exceptions) Order 1975.

---

6. Criminal Conviction Data

For employment and course purposes, we may need to know about criminal offences (including spent convictions). Any such processing will comply with Schedule 1 of the Data Protection Act 2018 and the Rehabilitation of Offenders Act (Exceptions) Order 1975.

---

7. Your Rights

The GDPR gives you rights over how your personal information is used:

- The right to be informed - we must tell you how we process your personal information.
- The right of access - you can ask to see what personal information we hold about you. This is called a Subject Access Request (SAR), which is outlined below.
- The right of rectification - where information about you is inaccurate, you can ask us to correct it.
- The right to erasure.
- The right to restrict processing – in some circumstances, you can ask us to restrict the processing of your personal data. This right, where it applies, also allows you to ask us to retain your personal information but not to use it.
- The right to data portability – in some circumstances, you can request a copy of the personal data you have provided to us in a machine-readable form, so you can transfer it to another organisation for a similar purpose.
- Right to object – where there is no legal obligation for PPA to process your data, you can object to us processing your personal information.
- Rights in relation to automated decisions and profiling - where computers make decisions about you, including automated profiling, you have a right to challenge the decision or ask for a human to check an automated decision.

---

8. Data Control and Responsibility

PPA is responsible for how all data collected within PPA is used, and takes account for the correct management of this information.

Any queries or questions should be sent to HR or the Head of Faculty and Education.

---

9. Make a Subject Access Request (SAR)

You can make a SAR to find out what information PPA holds about you. We will respond to your request within one calendar month.

To make a SAR, please email us at enquires@ppacademy.co.uk.

There is not normally a fee for a SAR, but where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the actions requested; or (b) refuse to act on the request.

Before we can disclose any information to you, we will need to see evidence of your identity. We ask for photo ID if possible.

You can ask someone else to make a SAR on your behalf. We will need to see evidence that the person making the request is entitled to act on your behalf and they will also need to provide us with evidence of your identity.

Please note we will not retain copies of your identification documents.

Data Protection Policy

As an affiliate of De Montfort University (DMU), PPA uses the DMU Data Protection Policy to provide specific information on how and for what purposes data is used, and how it can be accessed. The policy is available at https://www.dmu.ac.uk/documents/policies/data-protection-policy.pdf.

Policy Updated: August 2024
Policy Update due: September 2026