



Privacy Notice – NQNs, Norlanders and PAN members

1. INTRODUCTION

This privacy notice explains how Norland College Limited (**Norland**) uses the personal data of NQNs, Norlanders and PAN members and associates. PAN is the Professional Association of Norlanders. Broadly speaking your 'personal data' is information about you that either identifies you or from which you are identifiable. Examples of the personal data held about you by Norland include information about your achievements, your contact details and your work history.

Norland is known as the 'controller' of this personal data under data protection law.

If you have any questions about how we use your personal data please contact the - Head of HR, Resources and Compliance at enquiries@norland.ac.uk.

2. WHAT PERSONAL DATA DO WE HOLD ABOUT YOU AND WHERE DOES IT COME FROM?

The personal data that we hold about you is likely to include:

- Full name and title
- Address and address history
- Contact number and email address
- Date of birth
- Nationality
- National insurance number
- First aid and training qualification certificates, including set number
- DBS disclosure result and/or update service details
- References
- College report and appraisals
- Fitness to practise and any occupational health reports
- Cause for action
- Work history
- Proof of eligibility to work in the UK, such as, a copy of your passport or right to work visa details
- Evidence of a right to work in countries outside of the UK, such as a USA Green Card
- CV
- Information about your attendance at alumni events

This covers most of the personal data that we hold about NQNs, Norlanders and PAN members and associates, but we may have additional personal data depending on your particular circumstances.

We are likely to receive your personal data from sources such as:

- The families that you have worked with, for example, they may provide us with references and other information about your work for them.
- External agencies, for example, the Disclosure and Barring Service and occupational health consultants.
- We will have information from your time at Norland College, for example, reports and appraisals.

We may receive your personal data from other sources depending on your particular circumstances. The more detailed information below provides information about possible additional sources of your personal data.



3. NORLAND'S PURPOSES FOR USING YOUR PERSONAL DATA AND OUR LAWFUL BASES

We use your personal data:

1. for assessing your performance in your NQN year;
2. for alumni engagement reasons;
3. in relation to the Professional Association of Norlanders (PAN);
4. in relation to our work as an employment agency;
5. to deal with grievances, disciplinary actions and complaints;
6. to comply with our legal and regulatory obligations; and
7. for other reasons, including to protect Norland's interests, for example, when seeking professional advice.

Under data protection law, we are only allowed to use your personal data if we have a lawful basis for doing so. These bases are as follows:

- Legitimate interests: Our lawful basis for many of our purposes will be legitimate interests. This applies where using your personal data is necessary for our legitimate interest, or someone else's legitimate interest, provided that this does not infringe your interests or fundamental rights and freedoms.

We will rely on legitimate interests for much of what we do under the seven purposes listed above unless a more appropriate lawful basis applies.

Specifically, we have a legitimate interest in:

- ensuring that there is an active alumni community of Norlanders which will benefit Norland and members of the Norland community, such as current students;
 - ensuring that our employment agency work is successful and promoting this work;
 - investigating if something has gone wrong and putting things right;
 - promoting and protecting Norland, including PAN; and
 - safeguarding and promoting the welfare of our current students with whom you may be in contact e.g. if you mentor a current student as part of their third year employment weeks programme.
- Contract: this applies when you have a contract with us and using your personal data is necessary for us to carry out our obligations under that contract. This basis also applies if we need to take steps at your request before we enter into a contract with you.

We are relying on contract as a lawful basis for much (but not all) of what we do under the fourth purpose listed above.

- Legal obligation: this applies where using your personal data is necessary for us to comply with one of our legal obligations. We are relying on legal obligation as a lawful basis for much (but not all) of what we do under the sixth purpose listed above.



- Public task: this applies when using your personal data is necessary for us to perform a task in the public interest or to exercise official authority. We may sometimes rely on public task as a lawful basis for the first, fifth and sixth purposes listed above.
- Vital interests: occasionally, we may need to use personal data to protect your vital interests or somebody else's vital interests. This usually only applies if we need to use personal data in an emergency, for example, a 'life or death' situation.
- Consent: we may rely on your consent in some circumstances and we will be very clear with you when we are seeking your consent. Where we rely on your consent to process your personal data, you may withdraw your consent at any time. To withdraw your consent please contact the following teams as appropriate:
 - NQN team – NQN@norland.ac.uk
 - Agency team – agency@norland.ac.uk
 - Alumni team – alumni@norland.ac.uk

In some cases we will rely on more than one lawful basis for using your personal data.

Where we use certain types of more sensitive personal data (e.g. about your health, religious views, criminal offences) we will rely on a processing condition, as well as the appropriate lawful basis.

4. OUR PURPOSES IN MORE DETAIL

The sections below contain more information about why we use your personal data under each of the six purposes above.

Assessing the performance of NQNs

If you are an NQN we will use your personal data to assess your performance during your NQN year. This may include your work being seen by the external examiner.

Alumni Engagement

We may use your personal data in the following ways:

- To maintain our alumni records, for example, checking that we have the correct contact details for you.
- We may take photographs and videos of you to promote our alumni engagement work and to promote Norland more generally.
- To keep you informed about alumni events and activities and in relation to your attendance at those events. For example, so that we can accommodate you if you tell us about any special needs or dietary requirements.
- To send you a copy of the Norland Quarterly newsletter and Norland Now alumni magazine.

We will seek your consent before sending you some types of alumni communications. For example, we will usually need your consent before sending you an email about an alumni reunion. We will rely on legitimate interests as our lawful basis where we do not need your consent.

Professional Association of Norlanders (PAN)

We may use your personal data in the following ways:

- To provide you with a PAN membership number and certificate if you are a PAN member or associate.



- To administer your continuous professional development (CPD) record and to check your eligibility when you sign up for Norland CPD courses.
- To provide you with ongoing support and guidance in relation to your career as an NQN or Norlander.
- To promote PAN, for example, we may use photos of you in publicity material. We may send you information about PAN in publications such as Norland Quarterly e-bulletins.

Employment Agency and Work Opportunities

We may use your personal data in the following ways in relation to our employment agency work and work that you may undertake:

- To process Disclosure and Barring Service (DBS) checks. Information obtained from your DBS check may be shared with our clients.
- To arrange interviews, sending placement documentation and negotiating contracts. This may involve sharing your personal data with private families, employees of private families, concierge companies acting on behalf of a private family and professional early years settings such as nurseries (referred to as clients in this privacy notice).
- To carry out safeguarding and fitness to practise checks. This will include an occupational health check ahead of starting your NQN year. We will share certain information with occupational health, such as, your name, telephone number and your role type.
- We may share your personal data with clients. This is likely to include your qualifications and CV (including first aid), references, your DBS check, your disciplinary record and a photograph of you. We may share health information about you with a client where this is directly relevant to the potential engagement for which you are being considered.
- To provide the services set out in the Norlander and NQN terms and conditions, and to comply with our other obligations under that contract.
- To provide you with ongoing support and guidance in relation to your career as an NQN or Norlander.
- If you sign up to use the Marvellous Babysitting app we will provide information to Marvellous Babysitting so that it can verify your status as a Norlander or NQN, for example, to check that there are no fitness to practise issues.
- If relevant we will share information about you (e.g. contact details) with Au Pair agencies. Au Pair agencies are typically used so that Norlanders can obtain visas.

Grievances, Disciplinary Actions and Complaints

We may use your personal data in the following ways:

- To deal with grievances and disciplinary actions. In some circumstances, and where appropriate, this may involve sharing your personal data with our clients.
- If we are dealing with a request for information, query, or complaint, we may need to share your personal data with the other people involved.
- If we become aware of issues that may lead to a safeguarding concern (e.g. a drunk driving offence) we will follow our safeguarding policy. We may share your personal data with the appropriate third parties (e.g. potential employers, the LADO, police



and/or occupational health) where this is necessary for us to comply with our safeguarding obligations.

Legal and Regulatory Obligations

We may use your personal data in the following ways:

- To comply with our legal obligations, for example, in relation to health and safety, safeguarding and data protection law.
- We may share your personal data with third parties where this is necessary for us to comply with our legal and regulatory obligations. This may include, our lawyers and regulators.

Other reasons

- If you are a Norlander and express an interest in volunteering with the Twins Trust we will share your details with them and provide information so that they can verify that you are able to work as a Norlander.
- We may share your personal data with our professional advisors (e.g. lawyers, accountants), for example, when we need their advice on a particular issue.
- We may use your personal data in connection with legal disputes. This may involve sharing your personal data with other people, such as, our lawyers and the other parties involved.
- We may share your personal data with our insurance company to make sure that we have the insurance cover that we need or in connection with an actual or possible claim.
- We may use your personal data in relation to the prevention and detection of crime. If appropriate, we may share information with external agencies, such as, the police.
- If ever in the future, we are considering restructuring Norland we may share your personal data with the other parties involved and with the relevant professional advisors.

We use service providers to handle personal data on our behalf for the following purposes:

- a. IT consultants who help run Norland's computer systems. For example, they might need to access a file containing personal data when investigating a fault or checking the security of our IT network;
- b. caterers may be given information about any food allergies or intolerances that you have;
- c. we use a website provider to help us with our website;
- d. we use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the Norland site, including a web-based CRM database and screening platform.

5. FOR HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will retain your personal data for as long as we need it for our purposes. When determining retention periods we consider any legal, accounting, or reporting obligations. In addition, we may keep personal data for longer than usual if this is necessary in connection with any disputes. Further information about retention periods can be found in our Data and Retention Policy.



We may also keep some personal data indefinitely for archiving purposes (this is known as "archiving in the public interest" under data protection law) and for historical research purposes. For example, we keep photographs so that we will have an historical record.

6. SENDING PERSONAL DATA TO OTHER COUNTRIES

When Norland transfers personal data outside of the UK, we have to consider whether your personal data will be kept safe. Some countries are considered by the UK Government to have adequate rules and this includes all of the European Union and some other countries, such as, New Zealand, Norway, Switzerland and Argentina.

In certain circumstances, we may send your personal data to countries which do not have the same level of protection for personal data as there is in the UK. We will provide you with additional details about where we are sending your personal data, and the safeguards which we have in place, outside of this privacy notice.

If you have any questions about the safeguards that are in place please contact the Head of HR, Resources and Compliance at enquiries@norland.ac.uk.

7. YOUR RIGHTS REGARDING YOUR PERSONAL DATA

- **Correction:** if information held about you by Norland is incorrect or incomplete you can ask us to correct it.
- **Access:** you can also ask what information we hold about you and be provided with a copy. This is often known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and who we have sent it to.
- **Deletion:** you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your personal data to you or to a third party in a format that can be read by computer in certain circumstances.
- **Restriction:** you can request that we restrict how we use your personal data in certain circumstances.
- **Object:** you may object to us using your personal data where:
 - we are using it for direct marketing purposes;
 - the lawful bases on which we are relying is legitimate interests or public task;
 - if we ever use your personal data for scientific or historical research purposes or statistical purposes.

Please note that these rights do not apply in all cases and are subject to exemptions.

8. FURTHER INFORMATION AND GUIDANCE

The Head of HR, Resources and Compliance at enquiries@norland.ac.uk is the person responsible at Norland for managing how we look after personal data and she can answer any questions that you may have.



If you fail to provide certain information when requested, we may not be able to provide the information or service you have requested. We may also be prevented from complying with our legal obligations.

You have a right to lodge a complaint with the Information Commissioner's Office – www.ico.org.uk. If you do have any concerns about how we have handled your personal data we would kindly ask that you contact us in the first instance before you speak to the ICO so that we have an opportunity to put things right.

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