

PORTH AGORED – DRAFT PRIVACY STATEMENT

This statement explains what information Porth Agored collects, processes, stores and shares about individual learners undertaking the Graduate Certificate in Consolidation of Social Work Practice Programme. The statement does not cover information that is the responsibility of either the University of Wales Trinity Saint David or the individual Local Authorities that make up the Porth Agored partnership.

What information is being collected?

As part of your registration and participation on the Graduate Certificate in Consolidation of Social Work Practice ("The Certificate"), we collect the following items of information about you:

From the Porth Agored Application Form, we collect your:

Name; Telephone number; Employer; Employer ID or pay number; Date of Social Work qualification; Awarding University; SCW registration number; Work pattern; Service area; Team allocation; E mail; Workplace address; Posts held since qualification with dates; Special requirements; Preferred language; Start date on programme; Data Protection agreement; Mentor's name and contact details.

From the Porth Agored Learning Agreement, we collect your:

Name; Employer; Team; Mentor's name; Line manager's name

UWTSD collects the following information from the online application form.

Name; Address; Telephone number; Employer; E mail; Workplace address; Special requirements; Preferred language; Data Protection agreement;

UWTSD information is subject to its data protection policy and separate student privacy statement available at:

[data-protection-policy-uwtsgroup.pdf](https://www.uwtswales.ac.uk/data-protection-policy-uwtsgroup.pdf)

And

[Microsoft Word - student-privacy-statement1](#)

Who is collecting it?

Porth Agored is a partnership of twelve Welsh Local Authorities (Swansea, Neath Port Talbot, Carmarthenshire, Pembrokeshire, Ceredigion, Powys, Gwynedd, Denbighshire, Flintshire, Wrexham, Conwy and Anglesey) together with the University of Wales, Trinity Saint David collect your data. Together, we are joint data controllers for the purposes of running and awarding the Graduate Certificate in Consolidation of Social Work Practice. Each one of us, as partners in Porth Agored, is responsible for ensuring the quality and security of your personal data while we process it. The agreements we have between us reflect the fact that each is responsible for the processing of data while under our respective control.

This Privacy Statement only covers Porth Agored as the partnership body. It does not cover any data that individual Local Authorities may otherwise hold about you. That data is subject to the privacy arrangements that those organisations have and comply with

e.g. the Portfolio, Marking, Assessment and Feedback sheets, Result letters, correspondence with individual learners about their programme of work.

How is it collected?

Porth Agored collects information about you primarily through the Porth Agored Application Form you complete in relation to enrolling on the programme as well as the Learning Agreement you complete with your line manager and mentor.

Other information may be collected at the start or during the programme by the University of Wales Trinity Saint David or your employer as part of the registration process/UWTSD application process as well as workshops you attend, your portfolio, marking and assessment sheets, or other contact you have with those organisations. However, Porth Agored is not responsible for that data, although some of it may be shared with us or Social Care Wales where this is necessary for the proper conduct of your programme of work and social work registration. Please refer to the respective privacy statements and data protection policies of those bodies for further information.

Why is it being collected?

Porth Agored needs to use your personal data because gaining the Certificate is an essential part of maintaining your registration with Social Care Wales. Using and sharing your data between your employer, Porth Agored and the University of Wales Trinity Saint David is necessary for the purpose of supporting compliance of the contracts that learners, as data subjects, are party to i.e. their employment contracts (General Data Protection Regulations Article 6(b)).

The data Porth Agored collect, processes, stores or shares is not necessarily processed with the learners' consent, as we cannot consider this to be "freely given." Social Work is a regulated profession and as part of mandatory registration with Social Care Wales, learners must gain the Certificate as part of their first three years of practice. This means learners cannot realistically withhold consent for their data to be processed. They must participate in an approved qualification programme and so consent does not play a part in the use of the data. The wording we use on the Porth Agored application form and the learning agreement describes this, so learners understand the requirements of the course from the outset.

How will it be used?

We collect, store and share information to:

Enable learners to

- register and undertake all components of the Certificate
- attend and participate in all programme contact days
- comply with qualification programme and quality assurance requirements
- complete the programme in a timely manner
- receive communications about the programme or advice related to its component parts

Enable Porth Agored to:

- Comply with the terms of its agreements with the University, individual partner Local Authorities and learners
- Provide a qualification programme where the content complies with its approval by Social Care Wales as Regulator, and the University as the Awarding Body
- Provide a programme for learners that is capable of meeting learning outcomes set by Social Care Wales
- Set quality control processes that maintains the robustness and integrity of the programme
- Monitor learner progress during the currency of the qualification programme and provide additional advice and feedback where required so that learners are appropriately supported
- Operate a process that evaluates the delivery and effectiveness of the programme so that it can be continuously improved. This includes use of completely anonymised extracts from previously submitted portfolios for use in training new assessors or refresher training for existing ones.
- Support learners to comply with contractual requirements to achieve the appropriate qualification
- Meet its obligations to Social Care Wales to provide information about individual learner achievement for professional registration purposes or evaluation surveys, or anonymised data to help in wider statistical analyses about professional registration and development

Who will it be shared with?

Porth Agored shares information with the University of Wales Trinity Saint David, employers that make up the Porth Agored partnership, a small number of suitably qualified, experienced assessors that we contract with to mark portfolios, Social Care Wales or their nominated contractors who undertake work related to analysis of registration and compliance issues or evaluation of professional development programmes.

We will not disclose data to any other organisation in the UK, within or outside Europe, without learners' permission, unless we are required by law, or for social work regulation and registration purposes to do so. We will tell you if this happens, unless we are legally prevented from doing so.

What will be the effect of this on the individuals concerned?

The primary outcome of the programme is for learners to achieve the intended qualification in a timely manner. Doing so will enable learners to meet their professional development, registration and contractual requirements.

Programme completion is very much in the hands of the individual learner. It is possible that a learner might fail to achieve the qualification within the intended timescale. This could have implications for the speed at which an individual achieves pay progression within the workplace, or a need to explain the delay in qualification achievement to Social Care Wales at the point of first or subsequent re-registration as a Social Worker if there has been any delay in achieving the qualification. In both cases, processes exist to support learners beyond any original timescale for programme completion.

The collection, storage, processing and sharing of information collected during this time is intended only as part of helping to set up and administer the programme, monitor its usefulness, learner achievements or areas of difficulty, programme evaluation and development, and to meet obligations set by Social Care Wales.

Is the intended use likely to cause individuals to object or complain?

The nature of the qualification programme and those involved in its operation means that Porth Agored's processing of personal data is regarded as being low risk and occasional. As a partnership, we adhere strictly to the Data Protection Act 2018 and General Data Protection Regulations 2018.

We use the data we collect carefully. For example, we:

- Retain documents for specified periods of time only, after which printed materials are shredded. Any electronic information identifying learners is permanently deleted.
- Avoid storing material on memory sticks, portable hard drives or laptops unless those devices can be encrypted.
- Do not share information with anyone else (not specified in this document)
- Ensure that Assessors we contract to mark portfolios supply us with any information needed to allow us to comply with our Data Protection responsibilities. This applies particularly to any investigation into a security incident, or a request for data from a learner.
- Require Assessors to comply with a reporting process for any learner data that is lost, stolen, damaged, or either disclosed to or accessed by an unauthorised third party while in transit from them to Porth Agored, or while it is in their custody, Incidents must be reported to Porth Agored immediately, and no later than 24 hours after becoming aware of it.

The use of data collected by Porth Agored is strictly controlled for specified purposes. This means that there should be no reasonable cause for individuals to object or complain. However, anyone whose data is being processed by Porth Agored can exercise their Data Protection rights to **any** organisation participating in the delivery of the qualification programme, including Social Care Wales,

Learners can exercise any of their Data Protection rights by applying to any partner or organisation involved in the delivery of the qualification. They have a right to:

- access to any of his/her data
- rectify any personal data believed to be incorrect.
- If we believe that the data is correct, we will explain why
- have personal data erased if you believe that we no longer have a legitimate purpose to process it. If we refuse to delete any data, we will explain the reason why we need to retain it
- access to a machine-readable version of their data and to have it transferred to another organisation, as long as they have provided it to us. This is only applicable to data provided with the learner's consent or under a contract, but we will endeavour to give a portable version of other data should time and technology allow object to our processing of any data if we do not have a legal or contractual obligation to process it

- all our processing is based on your registration and contractual obligations.
- prevent any wholly automated decisions involving your data, we currently do not use any automated decision-making techniques. We will inform you if this changes in the future.
- complain to the Information Commissioner if you are unhappy with the way in which we have used your personal data: details about how to contact the Commissioner is available at www.ico.org.uk

How long will the data as collected by Porth Agored be kept for?

Document	Who keeps it	How long
Porth Agored Application Form	Learners own co-ordinator	Pass candidates- 12 months from date of results. Fail candidates -following all opportunities - Original document - 3 years Withdrawn candidates - 3 years
Porth Agored Learning Agreement	Learners own coordinator	Pass candidates- 12 months from date of results. Fail candidates - following all opportunities - Original document - 3 years Withdrawn candidates - 3 years
University application form and ethnic monitoring form	University	End of student relationship plus 6 years
Portfolio	Electronic Copy – University Hard Copy - Coordinators	Electronic copy – University Hard Copy - Coordinators Return to learner immediately after form confirming complete portfolio is signed
Assessor Contract	Porth Agored Chair	Electronic scanned copy – 2 years after expiry date
Assessment/markings sheet	University	1 year after the student successfully graduates
Interim feedback	University & learners' own coordinators	Coordinators – Until result
Result letter	University & learners' own coordinators	Coordinators - 5 years
Assessing process - Assessor - Feedback sheet, interim and final	University and Assessors	Electronic scanned copy – 2 years after expiry date
Extenuating and suspension of studies information	Coordinators	Deleted immediately. Information should only be sent to the University by the learner
Learner evaluation forms	University	6 months