



Privacy Notice – Placement Families, Student Job Shop, NQN and Agency Clients

1. INTRODUCTION

This privacy notice explains how Norland College Limited (**Norland**) uses the personal data of private families registered with the Placement, Student Job Shop, NQN and Agency teams. 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 your contact details, childcare preferences and basic information regarding your children for example, names and ages.

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
- Proof of address and address history
- Contact number and email address
- Bank details
- Proof child, including details such as name, date of birth, allergies, SEND
- Family home/ contents insurance and/or public liability insurance information (legal obligation for placing students in placement settings)
- Nationality

This covers most of the personal data that we hold about clients who use Norland's placement, Student Job Shop, NQN and/ or Agency services, but we may have additional personal data depending on your particular circumstances.

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

- External agencies, for example, NHS Health Visitors.
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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. in relation to our work as a college to source family placements for our students
2. to advertise short-term roles such as babysitting for families via the Norland online platform, JobShop
3. to support third year students to work with relevant families for their dissertation research



4. in relation to our work as a college to register families to advertise their positions for the NQNs
5. in relation to our work as an introductory employment agency
6. to deal with complaints
7. to comply with our legal and regulatory obligations
8. 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 eight purposes listed above unless a more appropriate lawful basis applies.

Specifically, we have a legitimate interest in:

- ensuring that there is enough appropriate family placements available for current students and NQNs to access as part of their training;
 - ensure there are enough family placements available for third year student to access for their dissertation research;
 - 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;
 - safeguarding and promoting the welfare of our current students with whom you may be in contact through the family placement service
- 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 of what we do under seven purposes 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 fourth and fifth purposes 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 fourth purpose 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:
 - Placement team – placements@norland.ac.uk
 - Student Job Shop team – studentjobshop@norland.ac.uk
 - NQN team – NQN@norland.ac.uk
 - Agency team – agency@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, 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 eight purposes above.

Sourcing family placements for students and registering client for NQN positions

If you have registered to be a family placement for a Norland student or to employ an NQN we will use your personal data to carry out due diligence checks and to issue the relevant terms and conditions of service. This may include maintaining appropriate records to ensure we have the correct contact details for you.

We will seek your consent before sending you some types of communications. For example, we will usually need your consent before sending you any marketing emails about our services. We will rely on legitimate interests as our lawful basis where we do not need your consent.

Employment Agency

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

- To register you as a client of the agency. This may involve requesting personal information about your children, i.e.: names, ages.
- arrange interviews, sending placement documentation and negotiating contracts. This may involve sharing your personal data with students, NQNs or Norlanders.
- To provide the services set out in the Norland Agency and Newly Qualified Nanny Team Terms and Conditions for Clients, and to comply with our other obligations under that contract.
- To invoice you for services rendered. This will involve sharing your name, address, email and contact number with the finance department.

Processing complaints

We may use your personal data in the following ways:



- 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, we will follow our safeguarding policy. We may share your personal data with the appropriate third parties (e.g. LADO, police) 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 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

- 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;
- 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.



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.

It will be highly unlikely that Norland would be sharing personal information about a family placement/ client with a third party in another country. However, should this be required, we will liaise with you ahead of sharing any information.

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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