



**Safeguarding Children and Vulnerable Adults
Policy and Guidance Privacy Note**

1. This privacy note sets out what we do with information we collect about you as part of the University's arrangements for safeguarding children and vulnerable adults. The notice is addressed to individuals who fall within the remit of the Safeguarding Children and Vulnerable Adults Policy. We will refer to all these individuals as "you" in this notice.

Who we are

2. We are Queen's University Belfast ("we", "us"), a Higher Education Provider.

Personal data we use and how long the information will be kept

3. The data collected and used will include personal and criminal offence data (including allegations, proceedings or convictions). Please refer to the table at Appendix 1 for details of what data will be collected, how it will be processed and how long it will be retained.

How we will use your personal data

4. With regards to personal and criminal offence data, the information collected will be used to determine your continuing suitability to work with children and vulnerable adults.
- 4.1 With regards to the parental consent document the information will be used to assist with first aid arrangements and to determine any special dietary requirements.

Reasons we can collect and use your personal data

5. The reasons we are processing your data is:
 - Processing is necessary for the performance of a contract with you or for taking steps into entering a contract with you.
 - Processing is necessary for compliance with a legal obligation.
 - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
 - Processing is necessary for the legitimate interests pursued by the University
- 5.1 Personal and criminal offence data is processed to allow the University to exercise an obligation conferred by law and/or because it is necessary for reasons of substantial public interest.

Who may have access to this information/who we may share your data with

6. The following members of staff may collect and/or review or have access to your information:
 - Human Resources Business Partners (if you are recruited by Human Resources)
 - Members of staff from the Admissions and Access Service (if you apply for a course of studies through this service)

- A member of staff from the Faculty/School or Directorate that is engaging you to work in regulated activity with children and/or vulnerable adults.
- Staff in Faculties/Schools and Directorates with responsibility for determining your suitability to work with children and/or vulnerable adults.
- Counter signatories – those who are registered with AccessNI to request criminal history checks. Those identified above may be the counter signatory who requested your criminal history check.

6.1 Your information may be shared with:

- Placement providers – if you are applying for a course of studies which involves working with children and vulnerable adults.
- Health and Social Care organisation/employers where this is necessary for management purposes in connection with the performance of your contractual or honorary contract duties.
- Regulatory bodies (e.g. the GMC, GDC, NISCC, NMC) – if you are applying for a course of studies, are employed, or are a worker, who is governed by a regulatory body.
- The Disclosure and Barring Service should a referral for a barring decision be required.
- The Police Service of Northern Ireland should you engage in behaviour which may require a criminal investigation

Your Rights

7. You can contact us at the address above for one or more of the following reasons:

To ask us to fix information about you that is wrong or incomplete, this is known as your right to rectification.

To ask us to delete information about you, this is known as your right to erasure.

To tell us you no longer agree to us using your information about you and ask us to stop, this is known as the right to object.

To tell us to stop using information about you to sell you products and services, which is known as the right to restrict processing.

To make “subject access requests” – which is a request for us to send you the information we have about you

To ask us to provide you or someone else (on your request) in a structured; commonly used machine-readable format with the information you have provided to us about yourself. This is known as “data portability” right.

To ask us not to use information about you in a way that allows computers to make decisions about you based solely on automated processing.

Contacting Us

8. The Information Compliance Unit
Registrar’s Office
Lanyon South
Queen’s University Belfast
University Road

BT7 1NN

info.compliance@gub.ac.uk

Complaints

9. You have the right to complain about how we treat your Personal Data and Special Personal Data to the Information Commissioner's Office (ICO). The ICO can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Changes to this Notice

10. We may update this Privacy Notice from time to time. We will notify you of the changes where we are required by law to do so.

Version	v1
Lead Directorate	Human Resources
Lead Author	Legal Services Unit
Approved by	Child and Adults at Risk Safeguarding Review Group
Approval date	16 May 2018
Review date	May 2019

What and how your information will be processed

Appendix 1

Type of information	How the information will be obtained	What information the University will have access to or process	Retention and sharing of data
On-line application form for an Enhanced Disclosure Certificate (EDC) – this form is completed by applicants for courses and employment/work which includes regulated activity	Application forms are completed on the NI Direct website. Applications are submitted to Queen's University Belfast for a University counter signatory to confirm the position applied for and that there is a lawful entitlement to the check. The form is then submitted to AccessNI.	You will be asked to provide the following information where relevant: <ul style="list-style-type: none"> • Every name you have been known by (with dates) • Your 5 year address history. • Your date of birth • Your national insurance number • Your passport number • Your driving licence number • Your place of birth • Your gender • Your nationality • Your contact number • Your email address • Password 	Your application form is not stored on any University system and is not retained in any format by the University.
On-Line application form for counter signatory registration – this form is completed by members of staff	Application forms are completed on the NI Direct website. Applications are submitted to Queen's University Belfast for Lead Signatory to submit to AccessNI.	You will be asked to provide the following information where relevant: <ul style="list-style-type: none"> • Every name you have been known by (with dates) • Your 5 year address history. • Your date of birth • Your national insurance number • Your passport number • Your driving licence number • Your place of birth • Your gender • Your nationality • Your contact number • Your email address Password	Your application form is not stored on any University system and is not retained in any format by the University.

PIN Notification and ID Validation Form	<p>Prior to submitting your EDC application form to AccessNI the University is required (by AccessNI) to complete this form. In addition you are required to provide three pieces of identification for the University to confirm your details match your appearance and your application form.</p> <p>This information is also processed for members of staff who are registering as counter signatories with AccessNI.</p>	<p>The University will require:</p> <ul style="list-style-type: none"> • 3 pieces of identification as determined by AccessNI <p>On the PIN Notification and ID Validation Form the University will record:</p> <ul style="list-style-type: none"> • Your full name • Your date of birth • Your current postcode • Your driving licence number • Your passport number • Your national insurance number 	<p>The completed form and copies of your identification will be retained by the University for 90 days as required by AccessNI.</p>
Counter signatory registration	<p>When your registration is complete AccessNI will issue you and the University with your counter signatory reference number and a personal identification number</p>	<p>The information is contained in a letter which is received by email</p> <ul style="list-style-type: none"> • Name • Email address • Counter signatory registration number • Personal identification number 	<p>The University will retain your name, position, counter signatory registration number and personal identification number on a spreadsheet until your registration is terminated.</p>
Enhanced Disclosure Certificate (EDC)	<p>This document is provided to you by AccessNI. A representative of the University must see the EDC if it contains any disclosure information. This will enable the University to determine whether you are suitable to engage in regulated activity with children and/or vulnerable adults. A photocopy of your EDC may be taken for consideration. The University will not request sight of, or a copy of, the EDC if there are no disclosures on it. This EDC will</p>	<p>An Enhanced Disclosure Certificate may contain:</p> <ul style="list-style-type: none"> • Any spent and unspent convictions, cautions, informed warnings or diversionary youth conferences which are not protected or filtered by the Rehabilitation of Offenders (Exceptions) (NI) Order 1979. • Non-conviction information held on police records which a Chief Police Officer reasonably believes to be relevant to the post applied for and ought to be disclosed. • Whether you are on the Children's and/or Adult's barred lists. 	<p>Once a recruitment or student admission decision is made the copy of the EDC will be destroyed. The information contained within the Certificate will not be disclosed to anyone where it is not related to that employee's duties, or to anyone who is not a member or employee of the University, unless there is a relevant legal exception/statutory obligation to provide such information, or the information is provided to a Government Department, or where</p>

	be handled in line with ANI's Code of Practice (issued under Part V of the Police Act).		a person has a specific legislative power to see such information.
Decision/outcome and rationale from the review of your Enhanced Disclosure Certificate (EDC)	This review of the EDC will either be carried out by one individual or by a panel, depending on whether the disclosure is deemed relevant to the role.	The individual/panel reviewing the certificate will have access to all of the information set out in it. The panel will be comprised of those with responsibility for determining whether you are suitable to engage in the regulated activity.	If the information is relevant, the decision/ outcome and the rationale for the decision/outcome will be retained. Details of the disclosed information will not be retained. This information will be retained by the University for 6 years post the termination of your relationship with the University. However, if there is a requirement to provide a regulatory body with information about the disclosure the details will be retained until the University has met its obligations, or for 6 years after the termination of the relationship, whichever is the longest. If the disclosure prevents an offer being made the information will be destroyed 6 months after the decision was taken. If the disclosure does not prevent an offer from being made, but you do not take up the offer the disclosure information will be destroyed within 6 months
Certificates of Good Conduct	Non-UK/ROI students are required to source a 'Certificate of Good Conduct' (CoGC) from the embassy of their home country.	Your certificate of good conduct will contain details of any criminal history which the embassy/police organisation believes ought to be disclosed.	If the information is relevant, the decision/ outcome and the rationale for the decision/outcome will be retained. Details of the disclosed information will not be retained.

	Any person (including students from the UK/ROI and Non-UK/ROI students) who has resided in any other country for one complete year is required to source a CoGC from the embassy of the country in which they lived.		<p>This information will be retained by the University for 6 years post the termination of your relationship with the University. However, if there is a requirement to provide a regulatory body with information about the disclosure the details will be retained until the University has met its obligations, or for 6 years after the termination of the relationship, whichever is the longest.</p> <p>If the disclosure prevents an offer being made the information will be destroyed 6 months after the decision was taken. If the disclosure does not prevent an offer from being made, but you do not take up the offer the disclosure information will be destroyed within 6 months</p>
AccessNI Case Tracker	The University can import information from AccessNI's website to use as a record of the EDC being completed.	<p>The following information may be exported:</p> <ul style="list-style-type: none"> • Your name • Your case number (i.e. EDC number) • The position applied for • The type of application (i.e. enhanced) • The organisation reference number • Status (certificate issued – this will indicate whether it is a no trace certificate of not i.e. whether a disclosure has been made) • Date your application was submitted to the University. • Date your application was submitted to AccessNI • Date application approved by AccessNI 	<p>This information will be retained by the University for 6 years post the termination of your relationship with the University. However, if there is a requirement to provide a regulatory body with information about the disclosure the details will be retained until the University has met its obligations, or for 6 years after the termination of the relationship, whichever is the longest.</p>

		<ul style="list-style-type: none"> • Date AccessNI started processing your application • Date of referral to a third party (i.e. date the police were asked to consider your application) • Date all third party actions completed • Certificate issue date 	If the disclosure prevents an offer being made the information will be destroyed 6 months after the decision was taken. If the disclosure does not prevent an offer from being made but you do not take up the offer the disclosure information will be destroyed within 6 months.
University Tracker	Your Faculty/School/Directorate will keep a record of your check.	<p>The following information is recorded:</p> <ul style="list-style-type: none"> • Name • Date of birth • What activity is regulated (main role or additional undertaking) • Which barred list was checked (i.e. the Children's or Adult's barred list) • Date you disclosure certificate was requested from AccessNI • Date referred to a third party • Date your certificate was issued to you • The reference number • Whether the check was a no trace check or not • Who your information was shared with • Date the Code of Conduct was issued to you • Date your certificate was destroyed • Date the University was invoiced for your check • Dates of your annual self-declarations • Date your self-declarations were destroyed 	<p>This information will be retained by the University for 6 years post the termination of your relationship with the University. However, if there is a requirement to provide a regulatory body with information about the disclosure the details will be retained until the University has met its obligations, or for 6 years after the termination of the relationship, whichever is the longest.</p> <p>If the disclosure prevents an offer being made the information will be destroyed 6 months after the decision was taken. If the disclosure does not prevent an offer from being made but you do not take up the offer the disclosure information will be destroyed within 6 months.</p>
Additional disclosures by applicants for courses which	At application stage applicants for courses of study which involve regulated activity which involve regulated activity are asked to disclose criminal history	<p>The following information will be requested:</p> <ul style="list-style-type: none"> • Details of any spent and unspent convictions, cautions, informed warnings or diversionary youth conferences which are not protected or filtered by 	If the disclosure prevents an offer being made the information will be destroyed 6 months after the decision was taken. If the disclosure does not prevent an offer from

involve regulated activity	information. This allows the information to be considered prior to an offer being made and prior to the EDC being requested in August when results are known.	<p>the Rehabilitation of Offenders (Exceptions) (NI) Order 1979.</p> <ul style="list-style-type: none"> • Whether you are, or have been, the subject of any criminal investigations or have any prosecutions pending. 	<p>being made but you do not take up the offer the disclosure information will be destroyed within 6 months.</p> <p>If the applicant enrolls with the University but the disclosure is not relevant to the activity the information will be destroyed within 6 months of the decision being taken. If the disclosure is relevant to the activity the information will be retained by the University for 6 years post the termination of your relationship with the University. However, if there is a requirement to provide a regulatory body with information about the disclosure the details will be retained until the University has met its obligations, or for 6 years after the termination of the relationship, whichever is the longest.</p>
Disclosures post enrolment for students engaging in regulated activity	Students who engage in regulated activity through their course, through a Club/Society, or for any work they undertake for the University are required to advise the University of any changes to their criminal history disclosures post enrolment. Disclosures are made to the student's School (or, if they are a worker, to the Directorate who engaged them)	<p>Relevant students are required to disclose:</p> <ul style="list-style-type: none"> • Details of any spent and unspent convictions, cautions, informed warnings or diversionary youth conferences which are not protected or filtered by the Rehabilitation of Offenders (Exceptions) (NI) Order 1979. • Whether they are or have been the subject of any criminal investigations or have any prosecutions pending. 	<p>If the disclosure is not relevant to the role no details will be retained. If it is relevant to the role the information will be retained by the University for 6 years post the termination of your relationship with the University. If there is a requirement to provide a regulatory body with the information details will be retained until the University has met its</p>

	and to the Directorate of Academic and Student Affairs.		obligations, or for 6 years after the termination of the relationship, whichever is the longest.
Disclosures post recruitment/ engagement for employees/workers engaging in regulated activity	Employees and workers who engage in regulated activity for the University are required to advise the University of any changes to their criminal history disclosures post enrolment.	<p>Relevant employees/workers are required to disclose:</p> <ul style="list-style-type: none"> • Details of any spent and unspent convictions, cautions, informed warnings or diversionary youth conferences which are not protected or filtered by the Rehabilitation of Offenders (Exceptions) (NI) Order 1979. • Whether they are or have been the subject of any criminal investigations or have any prosecutions pending. 	<p>If the disclosures are not relevant to the role no details will be retained.</p> <p>If the disclosure is relevant it will be investigated under a University procedure (e.g. the disciplinary procedure) and the information will be retained for 6 years after the closure of the case.</p>
Annual Self-Declarations	Anyone whose regulated activity with children and/or adults continues into the next year will be asked to complete an Annual Self Declaration by their Faculty/School or Directorate.	<p>The following information is required:</p> <ul style="list-style-type: none"> • Details of any spent and unspent convictions, cautions, informed warnings or diversionary youth conferences which are not protected or filtered by the Rehabilitation of Offenders (Exceptions) (NI) Order 1979. • Date of offence, disposal, conviction or sentence. • Details of any police or social services investigations or investigations by an employer or any other body. 	<p><u>Students</u></p> <p>If the disclosure is not relevant to the role no details will be retained. If it is relevant to the role the information will be retained by the University for 6 years post the termination of your relationship with the University.</p> <p>If there is a requirement to provide a regulatory body with the information details will be retained until the University has met its obligations, or for 6 years after the termination of the relationship, whichever is the longest.</p> <p><u>Students who are in regulated activity through work for University</u></p> <p>If the disclosure is not relevant to the role no details will be retained.</p>

			<p>If it is relevant to the role the information will be retained by the University for 6 years post the termination of your relationship with the University.</p> <p><u>Staff/Workers</u> If the disclosures are not relevant to the role no details will be retained.</p> <p>If the disclosure is relevant it will be investigated under a University procedure (e.g. the disciplinary procedure) and the information will be retained for 6 years after the closure of the case.</p>
Parental Consent Form	Faculties/Schools and Directorates will ask for this to be completed by parents prior to events with children. This will help to determine any dietary and medical needs and to record information which may be required in an emergency.	<p>The following information is requested:</p> <ul style="list-style-type: none"> • Child's name • Date of birth • Address • Emergency contact details • GP name and address • Details of known medical conditions and any medications. • Any other special needs or dietary requirements 	This form will be destroyed as soon as reasonably practicable after the event unless a medical situation arose.
Form for recording allegations.	Members of staff are required to record details of any allegations which are made to provide to the relevant Director.	<p>The following information may be captured:</p> <p>Alleged victim:</p> <ul style="list-style-type: none"> • Name, date of birth, address, telephone number, gender, parent's details, student or not, allegations raised themselves. <p>Details of the disclosure</p> <ul style="list-style-type: none"> • When it was made and who it was made to <p>Details of the allegation</p>	This information will be held as part of an investigation into the alleged perpetrator for 6 years after the closure of the case. Should this be a an employee who leaves employment prior to the 6 years the information will be destroyed with the personnel file 7 years after the

		<ul style="list-style-type: none"> • When and where it took place, name of alleged perpetrator and School/Directorate <p>Details of witnesses</p> <ul style="list-style-type: none"> • Name, position, contact details <p>Details of emergency action</p> <ul style="list-style-type: none"> • May include first aid <p>Names and dates of those informed</p>	<p>termination of the relationship. Should this be a student who leaves the information will be destroyed 6 years after the relationship with the University ends.</p>
Investigation of allegations	<p>Should an allegation be made about you by a child or vulnerable adult the allegation will be investigated under the relevant University procedure (e.g. Safeguarding Children and Adults at Risk, Fitness to Practice, Conduct, Disciplinary etc.)</p>	<p>The information collated will depend on the nature of the allegation but the following may be processed:</p> <ul style="list-style-type: none"> • The details set out in the Form for Recording Allegations (see directly above) • The circumstances around the allegation 	<p>This information will be held as part of an investigation into the alleged perpetrator for 6 years after the closure of the case. Should this be a an employee who leaves employment prior to the 6 years the information will be destroyed with the personnel file 7 years after the termination of the relationship. Should this be a student who leaves the information will be destroyed 6 years after the relationship with the University ends.</p> <p>The information may be shared with the PSNI and any other relevant statutory authorities, or with a third party (if the incident took place in the premises of a third party), or with a regulatory body.</p> <p>Following the investigation, if you are removed from regulated activity and the University believes you engaged in relevant conduct or harmed a child or vulnerable adult</p>

			full details of the allegation and the investigation will be referred to the Disclosure and Barring Service for a barring decision.
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