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# Privacy notice for the Prince of Wales Nursing Cadet Scheme

## 1 Who we are

We are the Royal College of Nursing, or the “RCN” for short. Our members are nurses, midwives, health care assistants and nursing students. We work in many different ways. We support our members. We try to influence government policy to improve patient care here in the UK and around the world. We promote and develop nursing research.

We believe that diversity is vital in the nursing profession. The Prince of Wales Nursing Cadet Scheme is part of our plan to promote diversity in nursing. That name is quite long, so we will refer to it as the “scheme” in this notice.

This notice provides information about the types of personal information we collect about you as a cadet on the scheme. It also provides information about how we will use your personal information and your rights over your personal information.

We are partners on the scheme with your uniformed organisation and regional placement providers, working together in the following way. The uniformed organisation identified you as a candidate for the scheme, and will help you throughout the scheme. The RCN is organising the scheme overall, because we want to use what we learn to help other young members of the uniformed services all over the UK explore an interest in nursing. As part of the scheme, you will work within a specific health partner, NHS trust or health board, to gain experience in the nursing profession.

This notice also applies to individuals working on the scheme at our partners, as well as parents/guardians of the cadets.

This notice is about the RCN and the scheme, specifically. The uniformed organisation and your placement provider will each give you information about how they use your personal information. If we start a new project or activity, or if you decide to train to be a nurse and join the RCN, we may provide you with new privacy notices with more information.

## 2 Get in touch

If you want to know more about what personal information we have about you, how we use it, or if you just want to ask us a question, then drop us a line. All requests regarding the RCN’s data protection and privacy policy should be sent to: Data Protection Officer, Royal College of Nursing, Copse Walk, Cardiff Gate Business Park, Cardiff, CF23 8XG or email: [dataprotection@rcn.org.uk](mailto:dataprotection@rcn.org.uk).

## 3 What is personal information?

When we use the phrase “personal information” we mean any information that could be used to identify you. At its simplest, this could just be your name and your email address. “Personal information” will also include any pictures or recordings of you. It will also include any feedback you give to us about the scheme, and any feedback we receive about you from our partners.

## 4 Where do we get your personal information?

We will collect your personal information from three sources.

- (a) Directly from you.  
For example, when you complete your placement request or provide feedback on your placement.
- (b) Indirectly from another source.  
For example, when your uniformed or youth organisation provides us with your details and any relevant forms that you have completed so that you can take part in the scheme, or when your health partner tells us about your progress on the scheme.
- (c) When it is available publicly.  
For example, if you tweet about your experience on the scheme or post on our Facebook page, we may keep a record of this.

## 5 What personal information do we collect?

The personal information that we collect and use about individuals includes, but is not restricted to:

- name
- contact details (email, phone and address)
- your cadet region
- your postcode
- your local health board
- your preferences for hospitals for placements
- your preferences for roles
- your availability for placements
- your shirt size (for the cadet uniform)
- feedback from you about the scheme, including reflections from your placement
- feedback from your cadet region on your performance on the scheme
- feedback from your health partner on your performance on the scheme
- photos, stories and videos about your participation in the scheme
- your progress in the nursing profession (for example, if you study nursing at university after finishing the scheme)
- any other information you may give us (for example, if you provide a quote for us to use in the promotion of the scheme).

Certain types of personal information are sensitive and need more protection. For example, information about your race or ethnic origins, political opinions, sex life or sexual orientation, religious beliefs, health information, biometric and genetic data. There are also special rules about the use of criminal information (information about criminal convictions or allegations about criminal convictions).

We will not usually collect these types of personal information about you. We will only process these types of personal information about you if we have a valid reason for doing so and only if the law allows us to do so. We ask for your racial and ethnic background, exclusively for the purposes of monitoring the diversity of our scheme. You can always decide not to provide us with this information.

## 6 What we do with your personal information?

We use your personal information to help us run the scheme. Specifically, we use your personal information to:

- register you with the scheme and arrange your placement
- provide you with a uniform and preparatory materials for the scheme
- connect you with a health partner for your placement
- liaise with your health partner about your placement, including asking for feedback about your performance
- liaise with the uniformed or other youth organisation about your participation in the scheme, including providing feedback about your performance
- handle any concerns or queries which are raised during the scheme, for example if you have a complaint about your experience or if someone else raises an issue about you
- feed back to the office of the Prince of Wales about the scheme overall
- develop marketing and promotional material about the scheme – which will be shared with our partners
- promote the scheme, at our events, online and in the media
- keep track of your progress after the scheme, so we can report on our impact on the nursing profession, including use of specialist external evaluation consultants to help us measure this
- study the outcomes of the scheme in the hopes of developing a sustainable national scheme.

We can only use your personal information if we have a valid reason. This is known as a “lawful basis of processing”. Different lawful bases of processing will apply to the different ways in which we use your personal information. Below we explain the lawful bases which we think apply to our use of your personal information

### (a) Legitimate interests

This is a flexible lawful basis. It allows us to use your personal information, provided that:

- i. we have a good reason to do so. For example, when your health partner provides us with feedback about the performance of cadets on the scheme we will take this information and feed back to the office of the Prince of Wales (in general – not about you in particular!)
- ii. you can reasonably expect we would use your personal information in this way. In other words, the way in which we use your personal information should not be a surprise
- iii. it fits with your rights, and doesn't affect you unfairly. Your rights are explained in section 10 below

when we rely on legitimate interests as a lawful basis our use of your personal information must be fair and balanced, and we need to consider the points above.

(b) **Consent**

This is where we ask your permission to use your personal information for a specific purpose. For example, we will ask to use a photo of you to promote the scheme before putting it on our Facebook page or when we collect more sensitive personal data from you (such as details about your racial and ethnic background, as we've described above) You always have the right to withdraw your consent. Just send us an email or call us using the details set out in section 2.

(c) **Legal obligation**

This is where we need to process your information to comply with a legal obligation. For example, we are under a legal obligation to try to keep you safe during your participation in the scheme. If there is any cause for concern about your welfare, we may need to work with other organisations – like the police or the local authority – and share your personal information with them.

## 7 Do we share your personal information?

We need to share your personal information with your uniformed or other youth organisation and your placement provider (i.e. the health partner) in order to run the scheme. We may also share anonymised or aggregate information about you with the office of the Prince of Wales, as part of our reporting about the progress of the scheme.

We are exploring models to evaluate the longer-term impact of the scheme, and so we may share your personal information (in particular, your progress in the nursing profession following the scheme) with evaluation specialists.

We will only share your personal information to the extent that we need to do so to operate the scheme in a safe and responsible way.

We use suppliers to help us operate the RCN, and the scheme. For example, we have a company that provides us with technical support to keep our systems up and running. We have written agreements with our suppliers that require them to keep your personal information safe, and only use any personal information in line with our instructions.

If we share your information with any other third party, we will let you know in advance where reasonably possible.

There are other circumstances where we may need to share your personal information, for example:

- (a) if we transfer the running of the scheme to another organisation
- (b) with our professional advisors e.g. lawyers, where necessary to protect our or a third party's interests
- (c) if we are under any legal or regulatory obligation to do so and
- (d) in connection with any legal proceedings or prospective legal proceedings, in order to establish, exercise or defend our legal rights.

## 8 How we keep your information safe

It's our job to keep your personal information safe and secure. We have security measures in place to protect your personal information, and we provide training to our staff about how to keep personal information safe.

The RCN's servers (which store all our information, including your personal information) are all hosted in the UK and/ or the European Economic Area ("EEA"). However we do operate around the world. This means that it is possible that personal information we collect from you may be transferred to and stored in a location outside of the UK or the EEA.

Certain countries outside of the UK or the EEA have a lower standard of protection for personal information, including lower security protections. Where your personal information is transferred outside the UK or EEA in a country which does not offer a similar level of protection to the UK or EEA, we will take all reasonable steps necessary to ensure that the recipient takes appropriate steps to protect your personal information for instance, entering into contracts that have been approved by the UK Government and/or EU authorities (as may be relevant).

## 9 How long do we keep your personal information?

We keep your information for as long as we reasonably need to use it for the reasons we set out in section 6. We want to keep track of the cadets who participate in the scheme (and the scheme overall, if we end up expanding the scheme). This is to see how many of you become nurses or otherwise support the nursing profession. To do this, we will generally keep personal information about you for six years from the end of the operation of the scheme. However, we will carefully consider what information we need and whether any of your personal information can be deleted before that time.

We may also retain information for longer periods where we are required to do so for legal or regulatory reasons, such as tax and accounting.

If you would like further information about this, please contact us using the details at section 2.

## 10 Your rights

You are in control of your personal information. When we use your personal information you have the right to:

- ask for a copy of your personal information

*We may ask you for proof that you are you (for example, a copy of your passport). If we are happy that this is the case, we will give you a copy of your personal information, unless an exemption applies. If you want to know more about how to request your personal information, the Information Commissioner's Office (or "ICO" for short) has good guidance: [ico.org.uk/your-data-matters/your-right-of-access/](https://ico.org.uk/your-data-matters/your-right-of-access/)*

- ask that we erase the personal information we hold about you

*we may not be able to erase your information (for example, we may need to keep your personal information for a legal reason), but we will consider your request and let you know*

- ask that we correct any personal information that we hold about you which you believe to be wrong
- ask that we stop using your personal information if you believe that the information we hold is wrong, or that we don't have a valid reason for using your personal information
- to change your mind and withdraw your consent
- ask us to stop using your personal information, if we are using it under legitimate interests

*we may not need to stop, but we will need to show a good reason to continue to use your personal information.*

There are other rights, which will not obviously apply to the way in which we are using your personal information. For example, the right to port (or transfer) your personal information to a third party in certain circumstances. But if you want to learn more about the rights discussed above or your other rights, the ICO has good guidance on these rights and when they apply: [ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/](https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/)

If you would like to exercise or ask about any of your rights, please contact us using the details at Section 2.

If you have any concerns about the way we are handling your personal information, or if you've asked a question or raised a complaint that we haven't dealt with, you can contact the ICO directly: [ico.org.uk/make-a-complaint/](https://ico.org.uk/make-a-complaint/)

## Updates to this notice

We may update this notice. If we update this notice in a way that significantly changes how we use your personal information, we will bring these changes to your attention where reasonably possible. Otherwise, you can access the latest version of this notice on our website.

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