



GDPR protocol for the distribution of PLENS reports to placement providers

Please note the following guidelines and recommendations from Trinity College regarding the purpose of PLENS reports and their distribution to placement providers to ensure compliance with the General Data Protection Regulation (“GDPR”).

Placement Learning Education Needs Summary (PLENS)

The central element of placement planning is a process of communication and information sharing. This process plays a key role in ensuring that students and staff in the placement are confident and enabled to:

- Clearly define learning outcomes and core competencies expected of students on professional placements
- Participate and understand effective disclosure/confidentiality process
- Identify students’ practice placement needs and their learning needs
- Provide and explain practice placement reasonable accommodations
- Maintain academic and professional standards
- Ensure the safety of students, staff and members of the public

The above mentioned reasons are the purposes for which we share PLENS reports with you.

For further information in relation to placement planning please see:

<https://www.tcd.ie/disability/services/placement-planning.php>

Data Protection and Data Sharing Principles

- **Consent and Information:** Students have given their consent to PLENS reports and other personal data being shared with placements providers. The sharing of PLENS reports is necessary to achieve the purposes set out above. In the event that a student withdraws consent we will inform you as soon as possible and request return and deletion of such data.
- **Verification:** Only provide the information to those with a legitimate right to it and for the purposes of implementing Reasonable Accommodations. **When you receive a PLENS report, verify that the student is in your Placement Site and that you have not received a PLENS in error before further dissemination of information takes places.** If you have received a report in error please inform the person who has sent you the report and delete the report immediately.
- **Management of Data:** Ensure your GDPR procedures in your Placement Site include a section outlining how you manage disability data. Please ensure that you do not email unprotected lists of personal data in relation to students or PLENS reports.
- **Sharing within the Placement Site:** Set out a clear process for the dissemination of disability data and share it only with those in the Placement Site who will have a clear need to know or access this data.

- **Staff awareness:** Ensure all staff who have access to this disability data and PLENS reports have completed GDPR training and are aware of the confidential and sensitive nature of the personal information contained in PLENS reports.
- **Security:** Store all lists and PLENS reports securely in line with your organisations GDPR procedures and ensure that personal data is stored securely incorporation appropriate security measures.
- **Retention of Records:** The PLENS reports and all personal data of students should only be kept for so long as is necessary. When the personal data or PLENS report is no longer required please arrange for data to be returned and deleted.
- **Data Breaches:** A personal data breach means “*a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data*”. In the event of a personal data breach please ensure to inform Trinity of any such breach **as soon as possible and in any event within 24 hours of such a breach whether an actual or potential breach.**
- **Data Subject Rights:** in the event that any complaint is made by a student in relation to proessing of their data or any request is made by a student to exercise any of their rights under GDPR please ensure to inform Trinity as soon as possible.

For further information please see:

<https://www.tcd.ie/disability/teaching-info/gdpr.php>

We would be grateful if you could arrange to sign this protocol to confirm that you will endeavour to implement the above data sharing and data protection principles and return a signed copy of this to us.

Placement Provider: _____

Date: _____