

Privacy Notice for BASCITT Trainees

Basingstoke Alliance School Centred Initial Teacher Training (BASCITT) is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your training relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all current, former and prospective trainees.

Who Collects This Information

BASCITT is a “data controller.” This means that we are responsible for deciding how we hold and use personal information about you.

We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of any contract of employment or other contract to provide services and we may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data Protection Principles

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

The Categories of Information That We Collect, Process, Hold and Share

We may collect, store and use the following categories of personal information about you: -

- Personal information and contact details such as name, title, addresses, date of birth, marital status, phone numbers and personal email addresses
- Emergency contact information such as names, relationship, phone numbers and email addresses
- Information collected during the recruitment process that we retain during your training period including references, proof of right to work in the UK, application form, CV, employment history, qualifications
- Education and training details
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information
- Criminal records information as required by law to enable you to work with children

- Performance information
- Disciplinary, grievance and cause for concern information
- CCTV footage and photographs
- Information from our communications systems
- DBS clearance
- Details in references about you that we give to other organisations
- Your racial or ethnic origin, gender, sex and sexual orientation as detailed on our equalities form

How We Collect This Information

- We collect this information through the application and recruitment process, either directly from trainees, UCAS applications, background check providers, for example DBS, other professionals we may engage (e.g. to advise us generally), automated monitoring of our websites and other technical systems such as our computer networks and connections, CCTV and access control systems, remote access systems, email and instant messaging systems, intranet and internet facilities.
- We may collect additional information in the course of training-related activities throughout the period of you training with us.
- We have access to your data stored by the Student Loans Company (SLC). We use the information provided to administer eligibility for tuition fees and bursaries. We generate fee paying agreements and issue your T&C's based on this information.

How We Use Your Information

We will only use your personal information when the law allows us to. Most commonly, we will use your information in the following circumstances: -

- Where we need to perform the contract, we have entered into with you
- Where we need to comply with a legal obligation (such as health and safety legislation, under statutory codes of practice and employment protection legislation)
- Where it is needed in the public interest or for official purposes
- Where it is necessary for our legitimate interests (or those of a third party) and your interests, rights and freedoms do not override those interests
- When you have provided us with consent to process your personal data

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. Please note that we may process your information without your knowledge or consent, where this is required or permitted by law.

The situations in which we will process your personal information are listed below:

- To determine recruitment and selection decisions on prospective trainees
- To inform recruitment and placement into a school
- In order to carry out effective performance of trainees and maintain trainee records
- To carry out vetting and screening of applicants in accordance with regulatory and legislative requirements

- Personnel management including retention, sickness and attendance, including obtaining advice from occupational health providers about health conditions to ensure compliance with employment and health and safety law
- To keep records of trainee performance and work/placement history to ensure acceptable standards of conduct are maintained and to manage training and progression. This aids in the recommendation of QTS
- Bank account details, payroll records and tax status information (Salaried trainees as applicable and tuition fee bursaries)
- Salary information (if applicable)
- For registration (PGCE/DfE) and recommendation for QTS (DfE)
- To respond to reference requests
- In order to manage internal policy and procedure
- Evidence for possible disciplinary or grievance processes
- Complying with legal obligations
- Education, training and development activities
- To monitor compliance with equal opportunities legislation
- Determinations about continued engagement
- Arrangements for the termination of the working relationship
- Dealing with post-termination arrangements
- Health and safety obligations
- Prevention and detection of fraud or other criminal offences
- To defend the BASCITT in respect of any investigation or court proceedings and to comply with any court or tribunal order for disclosure

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

How We Use Particularly Sensitive Information

Sensitive personal information (as defined under the GDPR as "special category data") require higher levels of protection and further justification for collecting, storing and using this type of personal information. We may process this data in the following circumstances: -

- In limited circumstances, with your explicit written consent
- Where we need to carry out our legal obligations in line with our data protection policy
- Where it is needed in the public interest, such as for equal opportunities monitoring
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards. Less commonly, we may process this type

of information where it is needed in relation to legal claims or where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent.

We will use this information in the following ways: -

- Collecting information relating to leave of absence, which may include sickness absence or family related leave
- To comply with employment and other laws
- Collecting information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting

Criminal Convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where it is necessary to carry out our legal obligations. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

Where appropriate we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of working for us.

Sharing Data

We may need to share your data with third parties, including third party service providers where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. These include the following: -

- The Department for Education (DfE)
- Ofsted
- Prospective Employers
- Welfare services (such as social services)
- Law enforcement officials such as police, HMRC
- LADO
- Training providers
- Professional advisors such as lawyers and consultants
- Support services (including HR support, insurance, IT support, information security, pensions and payroll)
- The Local Authority
- Occupational Health
- DBS
- Recruitment and supply agencies.

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.

Retention Periods

Except as otherwise permitted or required by applicable law or regulation, the School only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

To determine the appropriate retention period for personal data, the School considers the amount, nature, and sensitivity of personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for processing the personal data, whether we can fulfil the purposes of processing by other means and any applicable legal requirements.

Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with our data retention policy.

The School typically retains personal data for 6 years subject to any exceptional circumstances or to comply with laws or regulations that require a specific retention period.

Security

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. Details of these measures are available in our Information Security Policy, which can be supplied on request.

Third parties will only process your personal information on our instructions and where they have agreed to treat information confidentially and to keep it secure.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Your Rights of Access, Correction, Erasure and Restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Under certain circumstances by law you have the right to: -

- Access your personal information (commonly known as a "subject access request"). This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively we may refuse to comply with the request in such circumstances.
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.

- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances (for example for direct marketing purposes).
- To transfer your personal information to another party.

If you want to exercise any of the above rights, please contact the Data Protection Lead at BASCITT in writing.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Lead at BASCITT in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

How to Raise a Concern

We hope that the Data Protection Lead can resolve any query you raise about our use of your information in the first instance.

We have appointed a Data Protection Officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by the Data Protection Lead at Dove House School Academy Trust, then you can contact the DPO on the details below:

Data Protection Officer: Judicium Consulting Limited
 Address: 72 Cannon Street, London, EC4N 6AE
 Email: dataservices@judicium.com
 Web: www.judiciumeducation.co.uk
 Lead Contact: Craig Stilwell

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues.

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Collecting Data for Test and Trace

In the current pandemic, we may need to store your data for test and trace purposes. This is in order for the school to engage with the test and trace process, make decisions on safety within the school and whether individuals are required to self-isolate or carry

out a test. To do this we will be recording your name, contact number and date and time of arrival as well as time of departure.

To complement the above we may also ask for data that has not previously supplied. This will allow us to assess an individual's ability to attend/return to school and what measures may need to be put in place to allow for a safe return. We, additionally, may need to collect data about individuals that you reside with in order to factor in appropriate considerations for their wellbeing.

All data collected by the school will be processed in accordance with our retention, destruction, data protection and data security policies. All data collected for test and trace purposes will be retained for 21 days in accordance with government guidelines.

The legal bases for using your data in these circumstances will be for the reasons of substantial public interest and in the interests of public health. Dependent on circumstances the basis may be to assess the working capacity of an employee or to protect the vital interests of yourself or another person. We may need to share select data with others. This can be with the NHS and emergency services, public health, public authorities as well as other stakeholders. This will only be done where it is necessary and proportionate for us to do so.

Changes to This Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.