

Privacy Notice for Institute of Education Trainees

How we use your information

2021/22

Who are we?

Community Academies Trust is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Community Academies Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: **ZA073240**

You can contact the Academy Trust as the Data Controller in writing at:

Community Academies Trust, Dimbleby House, Stoneydelph Primary School, Crowden Road, Wilnecote, Tamworth, Staffordshire, B77 4LS or datacontroller@communityacademiestrust.org

What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about trainees using our services.

What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

What personal information do we process about trainees?

The categories of trainee information that we collect, hold and share include:

- Personal information such as name, email, or teacher number
- Qualifications and, where relevant, subjects taught
- Employer information
- Special categories of data including health information
- Emergency contact information and next of kin information
- Bank details
- Information about your criminal record
- Information about medical or health conditions or if you have a disability
- Biometric data and CCTV images/recordings

For what purposes do we use personal information?

We use trainee data to:

- Enable individuals to be paid bursaries where applicable
- Report to the Department for Education on various programs we run
- Record attendance at training events
- Allocate trainees to schools within our Institute of Education
- Provide absence, performance management, discipline and grievance and other statistics to effectively manage the trust
- Ensure effective general HT and business administration
- Provide references on request for current or former employees
- Ensure that we can act in an emergency

Collecting trainee information

Whilst some of the trainee information you provide to us is mandatory, some of it is provided to us on a voluntary basis, to allow you to access the programmes. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

To enable lateral flow testing in schools and the workplace, we need to process personal data of those taking part. For information on the data processed in relation to testing, please refer to the privacy information provided by the DfE and published on our website

<https://www.gov.uk/government/publications/coronavirus-covid-19-testing-privacy-information/testing-for-coronavirus-privacy-information-quick-read--2>

What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. Data Protection law sets out the lawful reasons we have to process your personal information, and these are as follows:

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We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. Data Protection law sets out the lawful reasons we have to process your personal information, and these are as follows:

1) To comply with the law

We collect and use general purpose trainee information in order to meet certain legal requirements and legal obligations placed upon the Academy Trust by UK law. We therefore have the right to process your personal information for such purposes without the need to obtain your consent.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

2) To protect someone's vital interests

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

3) With the consent of the individual to whom that information 'belongs'

Whilst much of the personal information is processed in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances,

we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

4) To perform a public task

It is a day-to-day function of the Academy Trust to ensure that trainees receive the training and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that trainees are properly supported and able to do their job.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

5) For legitimate interests

We are able to process your information as it is necessary for your legitimate interests.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 5.

Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

- 1) Explicit consent of the data subject
- 2) Necessary for carrying out obligations and exercising specific rights in relation to employment and social security and social protection law
- 3) Processing relates to personal data which is manifestly made public by the data subject
- 4) Necessary for establishing, exercising, or defending legal claims
- 5) Necessary for reasons of substantial public interest
- 6) Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
- 7) Necessary for archiving, historical research, or statistical purposes in the public interest

The lawful reasons for each type of sensitive category personal information that we process is set out in the tables attached.

Who might we share your information with?

We routinely share trainee information with:

- The Department for Education (DfE)
- Our bankers
- Other schools within our Institute of Education
- University awarding qualifications
- Relevant local authorities
- HRMC

We do not share information about our trainees unless the law and our policies allow us to do so.

Please refer to the table for information about what personal information is shared with which specific third parties.

What do we do with your information?

All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected. The Academy Trust monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

How long do we keep your information for?

In retaining personal information, the Academy Trust complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the Academy Trust are required to retain the information.

A copy of those schedules can be located using the following link:

<http://irms.org.uk/page/SchoolsToolkit>

Transferring data internationally

Where we transfer personal data to a country outside of the UK, we will do so with the appropriate safeguards in place in accordance with data protection law.

What are your rights with respect of your personal information?

Under data protection law, trainees have the right to request access to information about them that we hold. To make a request for your personal information contact the School Data Protection Officer at Warwickshire Legal Services via email at dpo@communityacademiestrust.org or alternatively;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

****Please ensure that you specify you are requesting personal information that Community Academies Trust holds and that you are a trainee within our Institute of Education.**

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased, or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way, we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Review

The content of this Privacy Notice will be reviewed in **October 2022**.

Table 1 – Personal information we are required to process to comply with the law:

| Information Type | Relevant legislation | Special Category– additional lawful reason | Third Parties with whom we share the information | Lawful reason for sharing |
|---|---|---|---|----------------------------------|
| <ul style="list-style-type: none"> • Name • Date of birth • Address • National Insurance number • Start date • Salary information • Student loan information • Contracted hours | Tax law | | HMRC | Legal obligation |
| ID verification for DBS | KCSIE | | DBS Checking Service | Legal obligation |
| <ul style="list-style-type: none"> • Section 128 check • Disqualification by association • Prohibition checks • DBS number | KCSIE | | Ofsted | Legal obligation |
| <ul style="list-style-type: none"> • Name • Address • Pay information • Pension information • Nationality • Gender • Ethnicity • Age • Job role | | | Office of National Statistics | Legal obligation |
| Accident records | Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 (RIDDOR) | | <ul style="list-style-type: none"> • Health & Safety Executive • Local Authority Health & Safety team (where necessary) | Legal obligation |

| | | | | |
|--|---|--|---|------------------|
| Individual trainee health & safety risk assessments and personal emergency evacuation plans (PEEP) | Health and Safety at Work etc Act 1974 and accompanying legislation | | Not shared externally | Legal obligation |
| Qualifying complaint information | Education Act 2005, Section 11B | | Chief Inspector | Legal obligation |
| Verification of Right to work in the U.K (Single Central Record) | Immigration, Asylum and Nationality Act 2006, Section 15 | | <ul style="list-style-type: none"> • Local Authority • Ofsted | Legal obligation |

Table 2 – Personal information we are required to process as it is necessary to protect someone’s vital interests

| Information Type | Special Category - additional lawful reason | Third Parties with whom we share the information | Lawful reason for sharing |
|--|---|--|----------------------------------|
| Medical Information | Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent OR Necessary for preventative/ occupational medicine | Medical staff i.e. paramedics/ambulance Responsible/First aid trained staff on residential trips | Vital Interests |
| Staff Dietary Requirements (food allergies) | Necessary for preventative/ occupational medicine | Medical staff i.e. paramedics/ambulance | Vital Interests |
| Medical Conditions & Staff Emergency Contact Details | Necessary for preventative/ occupational medicine | Medical staff i.e. paramedics/ambulance Responsible/First aid trained staff on residential trips | Vital Interests |
| Religious belief | Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent | Medical staff i.e. paramedics/ambulance | Vital Interests |

Table 3 - Personal information we are required to process with the consent of the individual to whom that information ‘belongs’

| Information Type | Special Category - additional lawful reason | Third Parties with whom we share the information | Lawful reason for sharing |
|--|---|--|---------------------------|
| <ul style="list-style-type: none"> • Name • Date of birth • Address details • Email address • QTS number and year • Academic and professional qualifications • Degree subject and university attended • Employer • NCTL returner number • Subjects taught • Telephone number • Teaching Line Reference Number • A level qualifications • Information on ITT provider and programme • Information on SKE subject and programme | | DfE | Consent |
| <ul style="list-style-type: none"> • Name • Email address | | University awarding qualification | Consent |
| <ul style="list-style-type: none"> • Name • Address • Date of birth • Email address • Telephone number • Teaching Line Reference Number • Degree subject and university attended • A level qualifications • Job title/responsibility • Specialist subject • Curriculum expertise | | Other schools within the Institute of Education | Consent |
| <ul style="list-style-type: none"> • Bank details • Name | | Trust bankers | Consent |
| <ul style="list-style-type: none"> • Name | | External training organisation | Consent |
| <ul style="list-style-type: none"> • Health information to meet trainee’s accessibility needs | Consent | | |

Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task

| Information Type | Special Category - additional lawful reason | Third Parties with whom we share the information | Lawful reason for sharing |
|--|--|--|----------------------------------|
| Attendance Records at staff meetings and staff training | | Not shared externally | Public task |
| Staff personal characteristics i.e. Religion/Gender/Ethnicity | Consent | <ul style="list-style-type: none"> • Local Authority • Confidential Recruitment Monitoring • Diocesan Education Service annual census | Public task |
| Medical Conditions (including allergies) | Necessary for preventive or occupational medicine. | Medical staff i.e. paramedics/ambulance, | Public task |
| Information relating to Covid – 19 testing: Name Date of birth Year Group Parent contact number Results of Covid – 19 testing | Necessary for reasons of public health | Public Health and other public health agencies | Public task |

Table 5 – Personal information we are required to process as it is necessary for your legitimate interests

| Information Type | Special Category – additional lawful reason | Third parties with whom we share the information | Lawful reason for sharing |
|---|--|---|----------------------------------|
| <ul style="list-style-type: none"> • CCTV images | | <ul style="list-style-type: none"> • Police • External security providers | Legitimate Interests |