



# Teaching London

## London Diocesan Board for Schools SCITT

### Teaching London

### Privacy Notice

### How we use Trainee Information

Under data protection law, individuals have a right to be informed about how Teaching London uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data. This privacy notice explains how we collect, store and use personal data about trainees.

Teaching London (London Diocesan Board for Schools SCITT Programme) at 2 West End Lane, Kilburn, NW6 4NT is the 'Data controller' for the purposes of data protection law.

We have appointed Grow Education Partners Ltd as our data protection officer (DPO) and the responsible contact is Claire Mehegan (see 'Contact us' below).

#### **1. The personal data we hold**

Personal data that we may collect, use, store and (when appropriate) share about our trainees includes, but is not restricted to:

- personal information (such as name, date of birth, national insurance number, next of kin, marital status and dependents)
- contact details (such as telephone number, email address, postal address, for you and your emergency contacts)
- characteristics (such as ethnicity, religion, language, nationality, country of birth)
- relevant medical information (such as physical or mental health conditions, including for any disabilities for which the organisation needs to make any reasonable adjustments to fulfil its duty of care)
- information about your remuneration if a paid trainee (including bank details, payroll records, tax status and entitlement to benefits such as pensions or insurance cover)
- information from background checks (such as criminal records checks and online search)
- recruitment information (such as copies of documentation proving right to work in the UK, references and information provided by you as part of the application process)
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the organisation
- assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence
- details of your schedule and attendance on school placements and general course attendance and training
- details of periods of leave or absence taken by you (such as sickness or family leave, including the reason for the leave)

- photographs (for internal safeguarding and security purposes, media and promotional purposes)
- closed circuit television (CCTV) footage
- data about your use of our information and communications systems (such as email).

We may also hold personal data about you from third parties, such as references supplied by former employers, information provided during pre-employment checks, and from the Disclosure & Barring Service, in order to comply with our legal obligations and statutory guidance.

Further information about the data we hold can be sought from Saskia Rossi [saskia.rossi@teachinglondon.org](mailto:saskia.rossi@teachinglondon.org) if required.

## **2. Why we collect and use this information**

The purpose of collecting and processing this data includes but is not limited to:

- Recruiting trainee teachers and running the training programme efficiently
- Enabling you to be paid and other benefits to be provided (where applicable)
- Fulfilling our legal obligations towards safeguarding pupils
- Providing delivery of our training programmes and meeting related legal obligations
- Supporting effective development, performance management, appraisal and feedback
- Allowing better financial modelling, administration and planning
- Providing references where requested
- Equalities monitoring and reporting
- Assessing the quality of our services
- Complying with the law regarding data sharing.

## **3. The lawful basis for using this data**

These are defined under data protection legislation and for personally identifiable information are:

- To fulfil a contract with you
- You have given consent for one or more specific purposes
- Processing is necessary to comply with legal obligations
- Processing is necessary to protect your vital interests
- Processing is necessary for tasks in the public interest or exercise of authority vested in the controller (the provision of education)
- Processing is necessary for Teaching London's legitimate interests or the legitimate interests of a third party.

When we process special category information, which is deemed to be more sensitive, the following lawful basis are used:

- You have given explicit consent
- Employment, social security and social protection
- It is necessary to fulfil our obligations or your obligations
- It is necessary to protect your vital interests
- Processing is carried out by a foundation or not-for-profit organisation (includes religious, political or philosophical organisations and trade unions)
- Reasons of public interest in the area of public health.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you can withdraw consent if you wish to do so.

#### **4. Collecting trainee information**

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

#### **5. Storing your data**

We create, store and process data for each trainee. The information is contained in a virtual or physical file which is kept secure and is only used for purposes directly relevant to your training.

Once your training with us has ended, we will retain this file and delete the information in it in accordance with our retention policy. Further information can be sought from Saskia Rossi [saskia.rossi@teachinglondon.org](mailto:saskia.rossi@teachinglondon.org) if required.

#### **6. Transferring data internationally**

We may send your information to other countries where:

- we or a company we work with store information on computer servers based overseas; or
- we communicate with you when you are overseas.

We conduct due diligence on the companies we share data with and note whether they process data in the UK, EEA (which means the European Union, Liechtenstein, Norway and Iceland) or outside of the EEA.

The UK and countries in the EEA are obliged to adhere to the requirements of the GDPR and have equivalent legislation which confer the same level of protection to your personal data.

For organisations who process data outside the UK and EEA we will assess the circumstances of how this occurs and ensure there is no undue risk.

Additionally, we will assess if there are adequate legal provisions in place to transfer data outside of the UK.

#### **7. Who we share information with and why we share it**

In order for us to function legally, effectively and efficiently, we are required to share data with appropriate third parties, including but not limited to:

- Schools in which you will have / are having training experience
- Plymouth Marjon University – to provide information on your performance
- The Department for Education – to meet our legal obligations to share certain information (such as information for the Initial Teacher Training Census)
- Educators and examining bodies – such as ensuring we adhere to regulations to guarantee the validity of examinations
- Local authorities – to meet obligations including addressing safeguarding concerns
- Ofsted – during school inspections
- Your family and representatives – such as in the event of an emergency
- Financial organisations – e.g. HMRC, pension scheme
- Suppliers and service providers – to enable them to provide the service we have contracted them for (such as payroll and IT)

- Central and local government – such as workforce planning
- Professional advisers and consultants – for us to develop our service
- Trades unions and professional associations – to enable them to provide the service their members require
- Police forces, courts, tribunals, security organisations – to create a secure environment for trainees and staff
- Health authorities (NHS) and occupational health and employee support schemes – to support the wellbeing of trainees
- Employment and recruitment agencies and future employers – to support reference requests

## 8. Data collection requirements

Our data collection requirements relate to our statutory obligations and our contractual obligations to trainees, the training schools with which we work and the Department for Education.

## 9. Data Protection Rights

Individuals have a right to make a ‘**subject access request**’ to gain access to personal information that we hold about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- NOT provide information where it compromises the privacy of others
- Give you a copy of the information in an intelligible form.

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

In most cases, we will respond to subject access requests within 1 month, as required under data protection legislation. However, we are able to extend this period by up to 2 months for complex requests or exceptional circumstances.

### Your other rights regarding your data:

You may:

- Withdraw your consent to processing at any time (This only relates to data for which we rely on consent as a lawful basis for processing)
- Ask us to rectify, erase or restrict processing of your personal data, or object to the processing of it in certain circumstances and where sufficient supporting evidence is supplied
- Prevent the use of your personal data for direct marketing
- Challenge processing which has been justified on the basis of public interest, official authority or legitimate interests.

- Request a copy of agreements under which your personal data is transferred outside of the United Kingdom.
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect you)
- Request a cease to any processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Refer a complaint to the ICO
- Ask for your personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances).

If you would like to exercise any of the rights or requests listed above, please contact Saskia Rossi

- Email: [saskia.rossi@teachinglondon.org](mailto:saskia.rossi@teachinglondon.org)
- Phone: 02079321126
- Post: 2 West End Lane, NW64NT

We will comply with data protection legislation in regard to dealing with all data requests submitted in any format, but individuals are asked to preferably submit their request in written format to assist with comprehension.

We reserve the to verify the requester's identity by asking for suitable proof (e.g. photo ID) if necessary. If this proves insufficient, then further ID may be required.

## 10. Data Protection Breaches

If you suspect that your or someone else's data has been subject to unauthorised or unlawful processing, accidental loss, destruction or damage, we ask that you please contact Adam Young Programme Director [adam.young@teachinglondon.org](mailto:adam.young@teachinglondon.org) and advise us without undue delay.

## 11. Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our Data Protection Officer (DPO) Claire Mehegan, [claire.mehegan@london.anglican.org](mailto:claire.mehegan@london.anglican.org)

Alternatively, you can refer a complaint to the Information Commissioner's Office:

- 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

## 12. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact either our Data Protection Lead Saskia Rossi [saskia.rossi@teachinglondon.org](mailto:saskia.rossi@teachinglondon.org) or our independent Data Protection Officer (DPO), Claire Mehegan, [claire.mehegan@london.anglican.org](mailto:claire.mehegan@london.anglican.org).