PRIVACY Notice

ABOUT THIS DOCUMENT

This document should be read in conjunction with the GDPR Data Protection Policy – May 2018

Durham SCITT is committed to protecting the privacy and security of your personal information. This privacy policy describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (see GDPR Policy – May 2018). It applies to all trainees and employees but does not form part of any contract of employment or other contract to provide services.

Durham SCITT 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.

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. We may amend this notice at any time.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection. These are data about ethnic origin, political opinions, religious or similar beliefs, trade union membership, health, sexual orientation, criminal proceedings or convictions, genetic or biometric data.

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

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status.
- Next of kin and emergency contact information.
- National Insurance number*1
- Bank account details*1
- Start date.
- Location of training
- Copy of driving licence/Passport/Identity document (only one ID document is kept after DBS)*1
- Recruitment information (including references and other information included in a CV or cover letter or as part of the application process) *1
- Employment records (including job titles, work history, working hours, training records and professional memberships).
- Performance information.
- Disciplinary and grievance information.
- Information about your use of our information and communications systems.
- Photographs.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity *2
- Information about your health, including any medical condition, health and sickness records *3
- Information about criminal convictions and offences *3

How is your personal information collected?

We collect personal information about applicants through the application and recruitment process (UCAS), either directly from candidates or sometimes from a background check provider (DBS). We may sometimes collect additional information from third parties including referees.

We will collect additional personal information (on your performance) in the course of training-related activities throughout the period you are training with us.

How we will use information about you

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

1. Where we need to share information with placement schools on your performance
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party – see data sharing) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the training we have entered into with you or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of you and those with whom you train / work alongside/).

Change of purpose

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.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Consent

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Data sharing

We may have to share your data with third parties, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. We require third parties to respect the security of your data and to treat it in accordance with the law.

The following activities are carried out by third-party service providers:

- Health forms will be assessed by Occupational Health if a disclosure is made.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Privacy and Electronic Communications (PECR)

The Privacy and Electronic Communications Regulations (PECR – 2003*) sit alongside the Data Protection Act. Durham SCITT follows the specific guidelines as set out in the PECR in the following areas: emails, texts and faxes.

Office 365 and One Note

We will use Microsoft One Note to store trainees' documentation relating to progress and achievement for the duration of the course. All SCITT staff have access to One Note and the assessment information, timetables and current achievement of each trainee. This information is not shared with third parties and no sensitive personal data is stored. As this is a requirement of the course, all trainees will be required to give their consent to the use of One Note for the purposes of monitoring and quality assurance. Durham SCITT will ensure appropriate security measures are in place to safeguard trainees' information.

Iris and video recording

At key points during the course, we may use IRIS camera technology to record trainees' lessons. This will be used for the review of current practice, quality assurance and training. All IRIS technology is password protected, no video footage is stored on local devices and once uploaded to the IRIS Connect platform, videos are encrypted and only viewable by the individual trainee and SCITT staff. No personal data will be stored using IRIS Connect. Videos that show pupils will be taken in accordance with individual school policies and permission will be sought prior to recordings being made. Durham SCITT will ensure appropriate security measures are in place to safeguard recordings and data.

Transferring information outside the EU

We will transfer the personal information we collect about you to certain countries outside the EU, in order to perform our contract with you: We use Microsoft 365 and, on occasion, Drop Box. We will ensure that your personal information receives an adequate level of protection and is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection.

Security

We have appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. 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. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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.

Data retention

We will only retain your personal information for as *long as necessary* to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

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:

- Request access to your personal information (commonly known as a "data subject access request").
- Request correction of the personal information that we hold about you.
- Request erasure of your personal information.
- Object to processing of your personal information.
- Request the restriction of processing of your personal information.
- Request the transfer of your personal information to another party.

Contact

For further information about your rights, or if you have any questions about this privacy notice or how we handle your personal information, please contact the Course Director. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

I,_____ (trainee/mentor), acknowledge that on _____ (date), I received a copy of Durham SCITT's Privacy Notice for trainees and that I have read and understood it.

Signature

……

Name

……

*under review in line with the new GDPR

*1 All hard copies of documents are retained for the duration of the course then shredded. All documents are held securely in trainees' files with restricted access.

*2 Ethnic data is downloaded for QA purposes. All ethnic data is coded and it is not possible to identify individuals. Ethnic data is deleted after use.

*3 Information about a trainee's health is only shared with a third party in the event of a declaration. All subsequent communication is confidential, and information is held securely. All data is deleted at the end of the academic year.