

**Privacy Notice for Trainee Teachers within the Pickwick Academy Trust**

**Last reviewed:** May 2023 **Review Cycle:** 24 months or as required

**Relevant Legislation:**

This document has been prepared in accordance with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and other related legislation and applies to all schools and operations of Pickwick Academy Trust.

The Trust collects and processes personal data relating its employees and trainee teachers to manage the relationship. The Trust is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

This Privacy Notice applies to:

* Trainees enrolled on our PGCE training programme
* Applicants to our PGCE training programme
* Individuals expressing an interest in teacher training through recruitment events
* Individuals expressing an interest in teacher training through email enquiry
* Individuals expressing an interest in teacher training through their school experience
* Any schools in our partnership
* Any partnership school staff working for Pickwick Academy Trust
* Any individual who wishes to work with Pickwick Academy Trust on an individual basis

This Privacy Notice provides details about:

* The personal information we collect.
* How we collect that personal information.
* What we do with the personal information.
* Your rights in relation to any personal information held and processed by the Trust.

The Trust has appointed a Data Protection Officer with responsibility for ensuring that personal information is held and processed in the correct way. Questions about this policy, or requests for further information, should be directed to the school/Trust or the Data Protection Officer at: i-west@bathnes.gov.uk

**What is personal information?**

Personal information is any information that relates to you that can be used directly or indirectly to identify you. This includes information such as your name, date of birth and address as well as information relating to your exam results, medical details, and behaviour records. This may also include sensitive personal information, such as your religion or ethnic group, details on any physical or mental health conditions, photos, and video recordings (including CCTV footage where it in place at a Trust school).

Where we process special categories of personal information or criminal records information to perform our duties, this is done in accordance with our legal obligations.

**Why we collect and use your information**

The Trust needs to process information about you to meet its obligations under your employment contract. For example, it needs to process your information to pay you in accordance with your contract and to administer benefit, pension and insurance entitlements.

In some cases, the Trust needs to process information to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled.

In other cases, the Trust processes your personal information before, during and after the end of the relationship. Processing personal information allows the organisation to:

* Run recruitment and promotion processes
* Maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of trainee contractual and statutory rights
* Operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace
* Operate and keep a record of trainee performance and related processes, to plan for career development, and for succession planning and workforce management purposes
* Operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that trainees are receiving the pay or other benefits to which they are entitled
* Obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that trainees are receiving the pay or other benefits to which they are entitled
* Operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the organisation complies with duties in relation to leave entitlement, and to ensure that trainees are receiving the pay or other benefits to which they are entitled
* Ensure effective general HR and business administration
* Provide references on request for current or former employees
* Respond to and defend against legal claims

Some special categories of personal information, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities).

Where the Trust processes other special categories of personal information, such as information about ethnic origin, sexual orientation or religion or belief, this is to carry out its obligations and exercise specific rights in relation to employment. Special categories of personal data is also processed for the purposes of safeguarding individuals (pupils and staff), as well as ensuring equal opportunities and treatment.

**The lawful basis on which we process this information**

There are several reasons why we hold, process, and share personal information. The lawful bases we rely on will therefore vary. However, generally, the lawful bases we mainly use in relation to our workforce are:

* To fulfil a contract we have entered into with you - for example we need to collect and use your personal information to fulfil the terms of the employment contract we have with you including to be able to pay you and to administer benefits and pensions.
* We need to comply with the law (we have a legal obligation) - for example, we collect and use workforce information under legal and statutory obligations within the Keeping Children Safe in Education (KCSIE) statutory guidelines. We are required to check employees’ suitability to work with children, their entitlement to work in the UK and to comply with health and safety laws.
* We need to carry out a task in the public interest - for example, where the collection and use of workforce information is necessary for us to perform our role as a school and to deliver our public task of providing education to our pupils.
* You have given us consent to use it in a certain way - for example a photo of you for promotional purposes or on our website.
* We need to protect your vital interests (or someone else’s interests). This relates to life and death situations.
* It is in ours, a third party’s, legitimate business interests to process the data. Where this is the case, we will ensure that we have considered whether our legitimate interests are overridden by your rights and freedoms as the worker or employee.

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 go about withdrawing consent if you wish to do so. We will then cease this aspect of processing.

# **Why do we collect and process trainee personal information?**

We use trainee personal information to:

* Support learning.
* Monitor and report on trainee progress.
* Provide appropriate pastoral care.
* Assess the quality of our services.
* Comply with the law regarding information sharing.

**Collecting this information**

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on

a voluntary basis. In order to comply with data protection legislation, we will inform you whether

you are required to provide certain information to us or if you have a choice in this.

**Storing this information**

We hold your information in line with our Retention Schedule. The digital data is stored on

database servers in a locked server room accessible only by approved staff. The paper records are

stored in a locked cabinet in a secure locked room accessible only by HR staff.

**Who we share this information with**

We routinely share this information with:

* Our Local Authority
* The Department for Education (DfE)

**Why we share this information**

We do not share information about our trainee teachers with anyone without consent unless the

law and our policies allow us to do so.

**Automated decision-making and profiling**

We do not make automatic decisions or undertake automated decisions regarding individuals to evaluate certain information about an individual (profiling).

**Requesting access to your personal information**

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the school/Trust or the Data Protection Officer by emailing i-west@bathnes.gov.uk

**You also have the right to:**

* Object to processing of personal information 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 information rectified, blocked, erased or destroyed

**Withdrawal of consent**

Where we are processing your data with your consent, you have the right to withdraw that consent if you change your mind or are unhappy with our use of your personal data. Please let us know by contacting the school/Trust or the Data Protection Officer on i-west@bathnes.gov.uk

**Contact**

If you would like to discuss anything in this Privacy Notice, please contact the school/Trust or the Data Protection Officer on i-west@bathnes.gov.uk

Alternatively, you can contact the Information Commissioner’s Office at <https://ico.org.uk/concerns/>