



## **Pennine Lancashire SCITT Privacy Policy**

The Privacy Notice below explains how we use information about you and the ways in which we protect your privacy.

### **Who are we?**

The Hollins is the data controller for the Pennine Lancashire SCITT, and for any queries in relation to the handling of personal data may be contacted via post to:

The data protection officer,

The Hollins

Hollins Lane

Accrington

BB5 2QY

Tel: 01254 233500

We are registered with the Information Commissioners office and our registration number is .....

### **Our Core Beliefs Regarding User Privacy And Data Protection**

- User privacy and data protection are of the utmost importance
- We have a duty of care to the people within our data
- We will never sell, rent or otherwise distribute or make public your personal information

### **The Data Protection Act 1998: Why do we collect and use SCITT Trainee information?**

By SCITT Trainees we mean anyone who has applied to the Pennine Lancashire SCITT, who may be considering applying to the Pennine Lancashire SCITT, is currently studying at the Pennine Lancashire SCITT, or has studied at the Pennine SCITT. For the purposes of clarity, this excludes trainees who apply to School Direct Lead schools for whom we are the Accredited Provider. We collect and use SCITT Trainee information under the following Articles of the General Data Protection Regulations (GDPR)

#### **Article 6:**

**Processing shall be lawful only if and to the extent that at least one of the following applies:**

**6 (1) a. The data subject has given consent to the processing of his or her personal data for one or more specific purposes;**

6 (1) e. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller.

#### **Article 9:**

With regards to the processing of personal data revealing 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 shall be prohibited except:

9 (2) a. Where we have explicit consent of the data subject.

For the avoidance of doubt, throughout this document we are using and applying the GDPR definition of **consent**, namely "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative actions, signifies agreement to the processing of personal data relating to him or her."



## **What is Personal Data?**

Personal data means data which relates to a living individual who can be identified from that data, or from that data and other information which is in the possession of, or is likely to come into the possession of Pennine Lancashire SCITT.

## **What Level of Personal Data is used?**

Where necessary Pennine Lancashire SCITT processes personal data to deliver our services effectively.

Where possible, the data that we process will be anonymised or pseudonymised (data which is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms).

## **Why we use personal information**

We use PLSCITT Trainee data:

- To communicate with potential applicants to the PLSCITT;
- To run an appropriate training programme for PLSCITT Trainees;
- To monitor and report on the progress of PLSCITT Trainees;
- To provide further support to PLSCITT Trainees during their early career;
- To satisfy the requirements of pre-employment checks / Single Central Record recording;
- To enable management of bursaries, grants and funding as required;
- To assist with supervision and safety of pupils;
- To assess the quality of our services;
- To comply with the law regarding data sharing.
- deliver our teacher training programme, including DfE requirements, and support to you;
- manage your training;
- train staff;
- help investigate any worries or complaints you have about your teacher training;
- keep track of spending on teacher training;
- check the quality of teacher training; and
- help with research, statistical and planning of new teacher training programmes

## **The categories of PLSCITT Trainee information that we collect, hold and share include:**

- Personal information (such as name, employee or teacher number, national insurance number, address and a copy of a document confirming proof of address, telephone number);
- Emergency contact information (such as name, address, telephone number);
- Characteristics (such as ethnicity, language, religion, nationality, country of birth, gender, age);
- Bank/building society information to enable payment of bursaries;
- Medical information that is provided by a trainee;
- Qualifications and employment history;
- Result of a DBS check;
- Result of an employer access teaching barred list check;
- School workforce images including photographic identification document;
- Computer use history, including web browsing history and email records;



- CCTV footage;
- Course information (such as dates of training, placement schools, assessment and monitoring information);
- Attendance information (such as sessions attended, number of absences and absence reasons, completed self-certificates, completed return to work forms, doctors notes and other medical evidence);
- Destination schools and employment.

### **Collecting PLSCITT Trainee information**

Whilst the majority of SCITT Trainee information provided to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you at the point of data collection whether you are required to provide certain information to us or if you have a choice in this.

### **Storing PLSCITT Trainee information**

- Unless stated below we hold PLSCITT Trainee personnel files for 7 years after the termination date of their training;
- We will store personal data relating to potential PLSCITT Trainee applications until the end of the academic year in which the application was made.
- We will erase any personal information relating to an unsuccessful PLSCITT Trainee application until the end of the academic year in which the application was made.
- Where an allegation of a child protection nature has been made against a PLSCITT Trainee, including where the allegation is unfounded, we hold personal files until the person's normal retirement age or 10 years from the date of the allegation, whichever is the longer, and then review on a case by case basis as per "Keeping Children Safe in Education Statutory Guidance for Schools and Colleges September 2016" and "Working together to Safeguard Children. A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children March 2015."
- Where former PLSCITT Trainees have given consent, we store personal information (name and contact details) to enable alumni to remain involved with the school community until such point as they withdraw that consent;
- CCTV footage is stored in line with the policies of the schools where the PLSCITT Trainees are placed and/or receive their training

### **Who do we share SCITT Trainee information with?**

We may need to share information within our organisation and with third parties directly related to ITE, such as:

<b>Supplier / Service</b>	<b>Details</b>	<b>Location</b>
Google Analytics	Web activity tracking	Worldwide
Eventbrite	Used for event bookings	Europe
UCAS	Applications	UK
Department for Education	Registration and recommendation for Qualified Teacher Status	UK
Student Finance	Bursary payments	UK
Manchester Metropolitan University	PGCE (PLSCITT & ELTSA School Direct)	UK
University of Cumbria	PGCE (ELIP)	UK
Consortium of North West SCITTs	Subject knowledge enhancement	UK
Princes Trust Institute	Subject knowledge enhancement	UK
Host schools and placement partnerships	Teaching placement, PRU, SEND, KS5 and Early years KS1&2 experience.	UK
Microsoft Teams	Web based learning platform	Worldwide
NASBTT	Online learning platform	UK
Corazon Health	For health assessments	UK
Personnel Checks	For DBS checks	UK
Auditors	For our financial records	UK
Elevate my Maths	For numeracy	Worldwide

PLSCITT will share your information only with organisations who require this as part of you achieving Qualified Teacher Status.

Where the data sharing is not undertaken on a statutory basis, we will ensure that we have either:

- A contractual agreement for the sharing of data with the company concerned demonstrating compliance to GDPR; or
- A copy of an up-to-date privacy statement from the company that satisfactorily demonstrates their compliance to GDPR for the purposes of the data sharing concerned. This will include those companies where school workforce is directed by the school to register online using their school email address.



We have a data sharing agreement in place with placement schools and have a retention policy about the secure disposal of records.

### Why we share SCITT Trainee information

We will not share information about you with third parties without your consent unless the law and our policies allow us to do so. We are required, by law, to pass on some of this personal data:

We share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding / expenditure and the assessment of educational attainment.

We share personal data with our appointed accountants to fulfil our statutory auditing requirements.

### Your rights

You have the following legal rights in respect of how PLSCITT processes your personal data:

To access the data about you that PLSCITT holds	<a href="#">ICO Guidance</a>	
To correct the details we hold	<a href="#">ICO Guidance</a>	
To have data erased in certain circumstances	<a href="#">ICO Guidance</a>	Contact PLSCITT using the details in the section "Who are we" above
To restrict the use PLSCITT makes of your data in certain circumstances	<a href="#">ICO Guidance</a>	
The right to object to processing, including the right to object to marketing.	<a href="#">ICO Guidance</a>	
To data portability in certain circumstances	<a href="#">ICO Guidance</a>	
The right to complain to the supervisory authority (Information Commissioner's Office)	<a href="#">ICO Guidance</a>	Contact the Information Commissioner's Office on 030 123 1113

### How can you access the information we hold about you?

We would normally expect to share what we record about you with you whenever we assess your needs or provide you with services. However, you also have the right to ask for all the information we have about you and your services. When we receive a request from you in writing, we must normally give you access to everything we have recorded about you. However, we will not let you see any parts of your record which contain:

- Confidential information about other people; or



- Information a member of our staff thinks will cause serious harm to your or someone else's physical or mental wellbeing; or if we think that a crime may be prevented or found out by disclosing information to you.

This applies to paper and electronic records. If you ask us, we will also let others see your records (except if one of the points above applies). If you cannot ask for your records in writing, we will make sure there are other ways you can apply.

### **How can you request correction of inaccurate information?**

You should let us know if you disagree with something written on your file. You may not always be able to change or remove the information. However, we will correct factual inaccuracies and may include your comments in the records.

Please contact the PLSCITT Administrator on 01254 233500 and ask to speak to the data protection officer, Louise Stubbs, if you would like to discuss this further.

### **How do we keep information secure?**

We will take appropriate steps to make sure we hold records about you (on paper and electronically) in a secure way, and we will only make them available to those who have a right to see them.

### **How long do we keep your personal information?**

*Data will only ever be held for a maximum of 7 years, often less than that.*

You have the right to request that Pennine Lancashire SCITT stop processing your personal data in relation to any service at any time. However, if this request is approved this may cause delays or prevent us delivering a service to you. Where possible we will seek to comply with your request but we may need to hold or process information in connection with one or more of the SCITT's legal functions.

### **Who will we share your personal information with?**

We will not share your information with any third parties, other than those specified earlier. Sometimes we have a legal duty to give information about people. This is only in the case of court orders. We may also share your personal information when we feel there is a good reason that is more important than protecting your confidentiality. This does not happen often, but we may share your information:

- for the detection and prevention of crime/fraudulent activity; or
- if there are serious risks to the public, our staff or to other professionals;
- to protect a child.

The law does not allow us to share your information without your permission, unless there is proof that someone is at risk. This risk must be identified as being serious before we can go against your right to confidentiality. When we are worried about your physical safety or we feel that we need to take action to protect you from being harmed in other ways, we will discuss this with you and, if possible, get your permission to tell others about your situation. We may still share your information if we believe the risk to others is serious enough to do so. There may also be rare occasions when the risk to others is so great that we need to share the information straight away. If this is the case, we will make sure that we record the information we share and our reasons for doing so. We will let you know what we have done and why as soon as or if we think it is safe to do so.



We do not sell personal information to any other organisation for the purposes of direct marketing.

### **Where can I get advice and support?**

If you have any issues over the clarity of these procedures, how they should be applied in practice, require advice about exemptions from the requirements or have any suggestions for amendments, please contact Claire Burns, Data Protection Officer at The Hollins.

For **independent advice** about data protection, privacy and data sharing issues, you can contact the Information Commissioner's Office (ICO). You have the right to lodge a complaint with the ICO if you have concerns over the processing of your data.

**Information Commissioner's Office**, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF  
Tel: 0303 123 1113. Alternatively, visit [ico.org.uk](http://ico.org.uk) or email [casework@ico.org.uk](mailto:casework@ico.org.uk).

### **Measuring website usage (Google Analytics)**

We use Google Analytics to collect information about how people use this site. We do this to make sure it's meeting its users' needs and to understand how we could do it better. Google Analytics stores information about what pages you visit, how long you are on the site, how you got here and what you click on. We do not collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are.

We also collect information on the number of times particular search terms are used and the number of failed searches. We use this information to improve access to the site and to identify gaps in the information content so we can plan appropriate expansion of the system.

Unless the law allows us to, we do not:

- share any of the information we collect about you with others
- use this information to identify individuals.

### **Third party cookies**

We use videos from YouTube and feeds from other websites such as Facebook and Twitter. These third party websites place cookies on your device when watching or viewing these pages.

Below are links to their cookie policies:

- [Google and YouTube](#)
- [Facebook](#)
- [Twitter](#)

### **Disabling cookies**

You can stop cookies being downloaded onto your computer or other device by selecting the appropriate settings on your browser. If you do this, however, you may not be able to use the full functionality of this website.

There is more information about how to delete or stop using cookies on [AboutCookies.org](http://AboutCookies.org). If you wish, you can also opt out of being tracked by Google Analytics.



Further information on the use of personal information can be found at [ico.org.uk](http://ico.org.uk)

**Breach statement**

A breach of this procedure is a breach of Information Policy. Breaches will be investigated and may result in disciplinary action. Serious breaches of Policy may be considered gross misconduct and result in dismissal without notice, or legal action being taken against you.