



SUFFOLK & NORFOLK SCITT
PERSONALISED. RELATIONAL. ETHICAL

PRIVACY NOTICE

FOR TRAINEES, NQTs, EMPLOYEES, CONSULTANTS, MENTORS, CONTRACTORS, PARTNER SCHOOL AND PARTNER ORGANISATIONS

ABOUT THIS DOCUMENT

Suffolk and Norfolk SCITT is committed to protecting the privacy and security of your personal information. This privacy notice 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 (GDPR). It applies to all trainees, employees, consultants, mentors, contractors, partner schools and partner organisations, but does not form part of any contract of employment or other contract to provide services.

Suffolk and Norfolk 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.

Suffolk and Norfolk SCITT has appointed Sian Durrant of School's Choice as its data protection officer. Her role is to inform and advise the organisation on its data protection obligations. She can be contacted at data.protection@schoolschoice.org and questions about this policy, or requests for further information, should be directed to her.

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, sex life, criminal proceedings or convictions, genetic or biometric data.

We will collect, store, and use some or all of 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 and dependants
- Next of kin and emergency contact information
- National Insurance number
- Bank account details, payroll records and tax status information (trainees in receipt of bursaries, employees and consultants only)
- Salary, annual leave, pension and benefits information (employees only – held on SCC HR system)
- Start date
- Location of employment workplace or placement school (trainees, mentors and employees only)
- Copy of driving licence /Passport /Identity documents (trainees, employees, consultants only)
- Recruitment information (including UCAS application forms, copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)
- Employment records (including job titles, work history, working hours, training records and professional memberships) (trainees, employees, consultants only)
- Performance information (trainees, including but not limited to termly reports, assignment grades, lesson observation feedback / employees PDR information – held on SCC HR system)
- Disciplinary and grievance information.
- Information about your use of our information and communications systems.
- Photographs (trainees, employees and consultants only)
- Video (trainees, lesson observations and assignment presentations)

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

- Information about your race or ethnicity
- Information about your health, including any medical condition, health and sickness records.
- Information from the Cambridge Personal Styles Questionnaire
- Information about criminal convictions and offences.

How is your personal information collected?

We collect personal information about trainees, employees, consultants, mentors, contractors, partner schools and partner organisations either directly from candidates and referees or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers or other background check agencies

We will collect additional personal information in the course of job-related or training-related activities throughout the period of you working for us or 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 perform the contract we have entered into with you.
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) as long as this interest does not affect your interests or infringe your fundamental rights, in particular your right to privacy

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 contract we have entered into with you (such as paying you, training you or providing a benefit), or we may be

prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

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.

Data sharing

We may share your data with third parties, including third-party service providers, where required by law, 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. In the case of trainees, we will share performance and other data with the University of Suffolk, placement school staff, schools requesting employment references, mentors and personal tutors.

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.

Transferring information outside the EU – (applicants and trainees only)

We will transfer the personal information we collect about you to certain countries outside the EU, in order to perform our contract with you as we use Google Drive as our Virtual Learning Environment. Occasionally, we may also transfer files using DropBox or WeTransfer when we are unable to use email. 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 training or 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.

Data on unsuccessful applicants to our courses (paper and electronic) will be kept for 1 academic year and then destroyed.

Data on trainees (paper and electronic) will be kept for 7 years after training is completed and will then be destroyed.

We will keep a record of the personal email addresses of NQT so that we can stay in contact to offer support after the course is complete.

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 Anna Richards, Executive Leader Suffolk and Norfolk SCITT (anna.richards@suffolk.gov.uk) 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.

You will be asked to complete an acknowledgment form to confirm that you have read and understood both the Suffolk and Norfolk SCITT Privacy Notice and Data Protection Policy.

By signing this acknowledgement, you are agreeing to your data being processed as outlined in the Privacy Notice and agreeing to follow the Data Protection Policy at all times.

Written and agreed: May 2018

Updated: August 2018

Reviewed: May 2020

Next Review: August 2021