

Ashton on Mersey SCITT Privacy Policy

Date amended: 20th July 2023

Aim

Ashton on Mersey SCITT (we/us) is a Teacher Training provider for both Primary and Secondary programmes. The accrediting school is Ashton on Mersey School, part of The Dean Trust.

As a SCITT, we understand and respect the importance of keeping personal data secure and fully comply with the GDPR. Data is held securely by way of secure systems, including physical and electronic security, access control, passwords and regular audits and checks.

Trainee data

Ashton on Mersey SCITT is committed to respecting your privacy rights and keeping your data secure. We pledge to handle your data securely, fairly and legally at all times and dedicated to being transparent about the data that we collect about you and how we use it.

This policy provides you with information about:

- How we use your data;
- What personal data we collect and why;
- How long we hold your data for;
- How we ensure your privacy is maintained; and
- Your legal rights relating to your personal data.

This privacy notice tells you how Ashton on Mersey SCITT obtains, stores and uses your personal information.

Applications to our course

Applications for our courses are via our course codes on the Apply Portal and you are providing data directly to us.

Ashton on Mersey SCITT is the data controller for applicants to our programmes. If you have any questions about the process or how we handle your information, please contact us at aomscitt@aom.trafford.sch.uk.

Applications are downloaded and printed from the Apply secure portals. The information we receive includes your name, address, date of birth, contact details, Application ID, any disability/special needs, country of birth, nationality, education history and qualifications, work history, referees and your personal statement.

What will we do with the information we receive?

All of the information we receive in the first instance will only be used for the purpose of progressing your application, and if you are successful this data will be transferred onto the DfE Register portal. We will use your contact details to contact you to progress your application and will use the other information received to assess your suitability for the course.

The information is used to assess your suitability to train to teach. We will not share any of the information we have received to any third parties for marketing purposes. The information we receive will be held securely by us and any of our data processors whether the information is in electronic (computerised) or physical (paper) format. You have the right to object to our processing of your data, however, this would mean that we would not be able to progress your application any further.

Initial Processing Stage

During the initial stage of the process, your application will be reviewed internally by the SCITT team and your details will be added to our database of applicants. If you are successful and accept our offer your data will be held by the SCITT for 7 years. If you are unsuccessful your details will be shredded and deleted electronically after one year. Some data may be anonymised and used for our own analysis. Our administration team will have access to all of this information and will comply with GDPR. No further processing of your data will take place until the time of deletion.

At this stage we will not be sharing any of your data outside of Ashton on Mersey SCITT.

Interview Stage

At this point you will be invited to an interview. If you are interviewed in a partner school, we may share basic details (limited to name) to the school administration team and any teaching staff that will be participating during the day. During the day, information will be generated by you and us, for example, interview notes and any tests that you may be asked to complete.

We are required to confirm the identity of applicants and evidence of required qualifications. At this point you will be asked to provide the following

- Passport or driving licence (photo ID)

These are required to enable us to make you an offer of a place and for safeguarding purposes, should you be successful.

All paperwork relating to the interview is held securely at Ashton on Mersey SCITT.

At this stage we will not be sharing any of your data outside of Ashton on Mersey SCITT.

Outcome Stage

Should your application be unsuccessful, we will inform you using your contact details held. Your paper application and all interview documents will be kept on file (either electronically or paper copy) in full format for a year to enable us to provide any feedback you may request and for our own analysis, at which point they will be anonymised. This data will be held in a format that does not allow identification of the applicant, and is kept to allow us to provide required data to the DfE on request. All copies of your ID and qualifications will be securely destroyed at the point of being informed of your application not being successful.

Sharing of your data:

If you were unsuccessful, we will not be sharing your data any further.

Should your application be successful, we will inform you using your contact details held. We will require proof of your qualifications – GCSE, A-Level and Degree. Your application, interview documents, ID, proof of address and qualifications will be kept on file (either electronically or paper copy) in full format for 7 years; this period is advised by the DfE and The National Association of School-Based Teacher Trainers (NASBTT) and has been approved by our Strategic Board.

At this point, we will require further processing of your information and to collect further information in order to provide the course to you. We will also need to share your information with some third parties whose details are outlined below:

- We will ask you to complete a DBS application – this is to ensure that you meet the criteria to train. We will provide your details to Trafford Council DBS service in order to complete an enhanced DBS check – this is to ensure safeguarding of the pupils within our partnership schools.
- As a requirement of the programme, we will ask you to complete an online health questionnaire via Optima Health – this is to establish your health and physical capacity to train to teach. All medical information is seen only by Optima Health and is held securely by them. Should any health issue be raised, your details may be sent to Optima Health Occupational Health for a telephone or face-to-face discussion.
- We will ask for emergency contact details – so we know who to contact in case of emergency.
- We may ask for your bank details – this only applies if you are entitled to a bursary or any other payment that we may need to make. This information will be shared with the Dean Trust Finance Department and Lloyds Corporate Banking.
- We will ask you to complete an application form for Leeds Trinity University for the PGCE element of the programme.
- We will notify the DfE that you are entering into the profession and request your TRN number.

- If applicable, we will confirm your attendance details onto Student Loans Company secure portal if you are in receipt of student finance – this will ensure you receive any maintenance loan you are entitled to is received on time and payment of your tuition fee loan is paid to the SCITT.
- We will use your basic information to support internal administrative processes such as our internal electronic sign in system, Mosaic access, IT access including Google Drive and internal assessment data such as overall grade across teachers' standards and to provide you with course content and any other provisions you may need to complete the course.

Trainees on our course

Ashton on Mersey SCITT is the data controller for trainees on the course, unless otherwise stated. If you have any questions about the process or how we handle your information, please contact us at aomscitt@aom.trafford.sch.uk.

What will we do with the information we hold?

All of the information we hold will only be used for the purpose that it was originally collected, that being to enable us to deliver the course or to fulfil legal or regulatory requirements as necessary. We will use your contact details to contact you to for the purpose of communication throughout your training year.

We will not share any of the information we have received to any third parties for marketing purposes. The information we receive will be held securely by us and any of our data processors whether the information is in electronic or physical (paper) format.

What information do we use and why?

We do not hold more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary. The retention period for people that have commenced training is 7 years, this is advised by the DfE and NASBTT.

The information we hold includes:

- Your basic information: name, address, date of birth, contact details
- Application ID
- Gender
- Disability, special needs & medical conditions.
- Country of birth
- Nationality

- Education history and qualifications
- Work history & referees
- Your personal statement
- Photograph
- DBS check details, including number & issue date – this is to ensure safeguarding of the pupils within our partnership schools
- Medical declaration forms and sick forms issued by your GP – this is to establish your fitness to train to teach and to assure your well being
- Details of results of your review gradings
- Details of your assessment results from Manchester Metropolitan University – we will ask you to sign a form giving your permission for us to receive this information from MMU.
- Details of any support plans
- Details of any disciplinary action/issues
- Details of any payments made to you
- Details of any payments received from you
- Details of any invoices which we raise for you
- Details of any SLC payments received in respect of your fees
- Attendance data, including confirming your attendance on SLC
- Passport or driving licence (photo ID).
- Proof of your qualifications.
- Disqualification by Association Declaration and self-disclosure form – this is to ensure safeguarding of the pupils within our partnership schools.
- Your emergency contact details – so we know who to contact in case of emergency.
- Your agreement to our SCITT Code of Conduct.
- Your bank details – this only applies if you are entitled to a bursary or any other payment that we may need to make.

We are required to process sensitive data for the purposes of public interest, this is set upon us by the DfE.

The information is used to deliver your teacher training.

Sharing of your data:

We will be sharing your data with the following recipients:

- DfE Data Management System - Register
- Leeds Trinity University
- External Moderator
- SCITT Strategic Board for your recommendation for QTS – your name and final grading will be shared.
- Trainee pen profiles will be shared with your placement school at the beginning of each placement. Your name will be shared with a partner school that hosts a training session.
- The Dean Trust Finance Department
- Student Loans Company (if applicable).
- Lloyds Corporate Banking (if applicable).
- Your name will be shared with our facilitator team.
- Our Quality Improvement Team will have access to your data on Mosaic
- Our auditors
- We will share your contact details with Optima Health so that they can undertake a fitness to teach online questionnaire. All medical information you share with Optima Health is confidential.

Former trainees

What information do we hold and why?

We are required to keep information on our former trainees, whether the course was completed or not, this is an obligation we must uphold as a Teacher Training provider. No routine processing of your data is performed and is only held to fulfill our legal obligations, or to help with the fulfilment of a contract on your behalf, for example, when asked to provide a reference for employment.

The DfE advise that your file is kept for 7 years following commencement of the course. Your complete file is made up of a physical (paper) file and electronic records. Data is minimised to the least amount possible and will include:

- Your basic information: name, address, date of birth, contact details (on application form)
- Gender
- Disability, special needs & medical conditions (on application form)
- Country of birth (on application form)
- Nationality (on application form)
- Education history and qualifications (on application form)
- Work history & referees (on application form)
- Your personal statement (on application form)
- Photograph
- Proof of your qualifications
- Passport or driving licence (photo ID)
- A copy of your completed Disqualification by Association Declaration.
- Details of results of your review gradings
- Details of your assessment results from the university
- Attendance data, including confirming your attendance on SLC
- Details of current employment

- Details of any support plans
- Details of any disciplinary action/issues
- Details of any payments made to you
- Details of any payments received from you
- Details of any invoices which we raise for you
- Details of any SLC payments received in respect of your fees

Items highlighted in bold are sensitive data and are subject to enhanced security procedures. We are required to process sensitive data for the purposes of public interest, this is set upon us by the DfE.

Sharing of your data:

At this point, your data will only be viewed by DfE, Ofsted or other government body in the event of an inspection, or to provide a reference for employment.

Visitors to our website

We keep the data collected by our website to the minimum possible, however, some data is collected to enable our website to function correctly. The website does give each visitor a unique ID, this allows the website to remember the pages you have visited and to provide us with analytics to see how visitors are using our website. We do not use this information outside of the website or for any other purpose. You are able to turn off cookies if you wish, however, some features may not work correctly if you do so.

People who register an interest at one of our recruitment events or attend a school experience day

We ask visitors if they would like to receive additional information about our programmes. To do this we ask visitors for their contact name and email address. You can ask to be removed from this list at any time.

People who contact us to express an interest in our course

If you call or email our office for information on our course, we will not routinely hold any data about you unless you request further information to be sent. This will be limited to your name and email address to allow us to send the information requested. We will not send you any unrelated marketing information or share your information and we will delete your details 6 months after contact.

Facilitators and Partner Schools

What will we do with the information we hold?

We use the data we hold to fulfil the contract for services between us, or to fulfil our legal requirements; your data will never be used for any other purpose. Records are held in both paper and electronic format.

What information do we hold and why?

To enable us to use your services and fulfil our contract, we will need to collect and store information, the information collected and held will be:

- A copy of your signed Partnership Agreement or Facilitator Contract – this is to ensure that both parties understand the conditions of the contract and to assist in the event of any dispute
- Details of any satisfaction evaluations that we receive – this is for continued development of our course
- Your bank details or your school bank details – this is to enable us to make payments to you or your school

Sharing of your data

We will publish your name and agreed contact method within our handbook, this is provided to trainees. We may also share additional data, including your qualifications and copies of your CV to government agencies, such as Ofsted. The data we share will be limited to what is necessary and will never be used for marketing or any other purpose.

Retention Period

We are required to keep data on our former contractors for a period of 7 years after the end of the final contract, after this time your data will be securely destroyed

Personnel of partnership schools

What information do we hold and why?

To enable us to deliver the course, we need to contact the mentors and Head Teachers at our Partnership Schools to provide and collect trainee information and gradings and to provide the administration of the course. This data is strictly limited to what is necessary:

- Name
- Position within the school
- Email address

- Contact telephone number

What will we do with the information we hold?

We will only use your data to run our course. Details will never be used for any other purpose.

Sharing of your data

We will only share your data in the event of a request by a government department, such as Ofsted. Your consent will always be requested in these cases.

Our legal basis for processing

Ashton on Mersey SCITT collects and uses collected personal data because it is necessary for:

- Complying with our legal obligations
- The pursuit of our legitimate interests (as set out below)
- The purposes of complying with our duties and exercising our rights under a contract for the delivery of our training programme.

The usual legal basis for processing data, is that it is necessary for complying with our legal obligations to the DfE and other government agencies or that it is necessary to enable us to fulfil our contract with you to provide your teacher training.

In general, we only rely on consent as a legal basis for processing in relation to sending direct marketing communications to applicants via email.

Our Legitimate Interests

Where the basis for processing is not our legal obligation or after you have provided consent, we may process your data for our legitimate interests:

- Protecting trainees, employees and other individuals and maintaining their safety, health and welfare
- Improving our existing course and developing new services
- Complying with our legal and regulatory obligations
- Preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies
- Handling trainee & applicant contacts, queries, complaints or disputes

- Managing insurance claims by any party
- Protecting Ashton on Mersey SCITT, its employees and customers, by taking appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to Ashton on Mersey SCITT
- Effectively handling any legal claims or regulatory enforcement actions taken against Ashton on Mersey SCITT, and
- Fulfilling our duties to our trainees, applicants, colleagues, shareholders and other stakeholders
- To allow us to provide feedback to unsuccessful applicants to our course or applicants to vacancies
- To allow us to provide any additional support that may be required to assist you in successfully completing your training.

Your rights

The GDPR provides the following rights for individuals:

- **The right to be informed**
This privacy notice provides information on the data we collect, hold and store, the purpose for holding and processing, the lawful basis for processing and holding your data, the retention periods for your data in all circumstances, the categories of data that we hold, who we may share your data with and why, contact details for our organisation, your rights, how to make a complaint and the sources of your data.
- **The right of access**
You have the right to request access to all of the data that we hold about you at any time. This information is free of charge. To request a copy of your information, please email aomscitt@aom.trafford.sch.uk or call our office on 0161 273 1179 ext 2289. This information will be provided within one month of proof of your identity being received.
- **The right to rectification**
If at any time you notice that your data is incorrect then please let us know and if your data is found to be inaccurate, we will rectify your data without delay. If there is a dispute over the accuracy of your data, we will inform you with our reasoning within one month and you will have the right to make a complaint to the ICO or another supervisory authority. You will also have the ability to seek to enforce this right through a judicial remedy.
- **The right to erasure (the right to be forgotten)**
The right to erasure is not absolute and does not apply in all circumstances. If you make a request to be forgotten, we will respond to your request within one month. You have the right to be forgotten if the following circumstances apply:

- The personal data is no longer necessary for the purpose which it was originally collected or processed for
- Consent was the lawful basis for holding the data, and you withdraw your consent
- Our legitimate interests was the basis for processing and you object to the processing of your data, and there is no overriding legitimate interest to continue this processing
- We are processing the personal data for direct marketing purposes and you object to that processing
- We have processed the personal data unlawfully (ie in breach of the lawfulness requirement of the 1st principle)
- We have to do it to comply with a legal obligation, or
- We have processed the personal data to offer information society services to a child.

If your request is upheld, we will contact anyone that we have shared your data with and obtain assurances that your data has been deleted.

When does the right to erasure not apply?

The right to erasure does not apply if processing is necessary for one of the following reasons:

- To exercise the right of freedom of expression and information
- To comply with a legal obligation
- For the performance of a task carried out in the public interest or in the exercise of official authority
- For archiving purposes in the public interest, scientific research historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing, or
- For the establishment, exercise or defence of legal claims.

The GDPR also specifies two circumstances where the right to erasure will not apply to special category data:

1. If the processing is necessary for public health purposes in the public interest (eg protecting against serious cross-border threats to health, or ensuring high standards of quality and safety

of health care and of medicinal products or medical devices); or

2. If the processing is necessary for the purposes of preventative or occupational medicine (eg where the processing is necessary for the working capacity of an employee; for medical diagnosis; for the provision of health or social care; or for the management of health or social care systems or services). This only applies where the data is being processed by or under the responsibility of a professional subject to a legal obligation of professional secrecy (eg a health professional).

If we are refusing your request we will inform you without undue delay and within one month of receipt of your request, providing you have given proof of your identification. We will inform you of the reason that we are not taking action and you will have the right to make a complaint to the ICO or another supervisory authority and have the ability to seek to enforce this right through a judicial remedy. We will not usually charge a fee, however, we reserve the right to charge a reasonable fee if your requests are unreasonable or excessive in nature.

- **The right to restrict processing**

The GDPR gives individuals the right to restrict the processing of their personal data in certain circumstances. This means that you are able to limit the way that Ashton on Mersey SCITT can use your data; this is an alternative to requesting erasure of your data. You have the right to restrict processing of your personal data where you have a particular reason for wanting the restriction. For example, this may be because you have issues with the consent of the information we hold or how we have processed your data.

The right to restrict processing applies when:

1. You contest the accuracy of your personal data held and you are verifying the accuracy of the data
2. Your data has been unlawfully processed and you oppose erasure and request restriction instead
3. Ashton on Mersey SCITT no longer needs the data, but you need us to keep the data in order to establish, exercise or defend a legal claim, or
4. You have objected to Ashton on Mersey SCITT processing your data and we are considering whether our legitimate grounds override yours as an individual.

In addition, you can also ask us to restrict processing whilst you await our response to your request to your right of rectification and objection. It is standard practice that we will automatically restrict processing in these circumstances. Once a decision is made, we will inform you that we will be lifting the restriction on processing of your data, along with the outcome of your request.

If we uphold your request to restrict processing, we will contact anyone that we have shared your data with and obtain assurances that no further processing will take place.

When does the right to restriction not apply?

We may refuse your request to restrict processing if any of the following exceptions apply:

1. We have your consent for further processing
2. The processing is for the establishment, exercise or defence of legal claims
3. It is for the protection of the rights of another person (natural or legal), or
4. It is for reasons of important public interest.

If we are refusing your request we will inform you without undue delay and within one month of receipt of your request, providing you have given proof of your identification. We will inform you of the reason that we are not taking action and you will have the right to make a complaint to the ICO or another supervisory authority and have the ability to seek to enforce this right through a judicial remedy. We will not usually charge a fee. However, we reserve the right to charge a reasonable fee if your requests are unreasonable or excessive in nature.

- **The right to data portability**

The right to data portability provides that you are able to request any data that you have provided to Ashton on Mersey SCITT to be provided in a structured, commonly used and machine readable format. We will usually use a format such as CSV files. It also provides that you can request that we transmit this data directly to another controller. This right only applies to data which you have supplied to Ashton on Mersey SCITT, either directly or by way of consequence of our contract, contact, training or agreement. **The right to data portability applies when:** 1. Our lawful basis for processing this information is consent or for the performance of a contract, and

2. We are carrying out the processing by automated (computerised) means, this excludes paper files. If your personal data would identify another natural or legal person, we may decide to withhold part of the information supplied, unless we are able to obtain consent from the third party. You will be informed if this is the case. We will respond to your request without undue delay and within one month of your request. If we have decided not to provide the data as we deem the request to be excessive or repetitive in nature, you will have the right to make a complaint to the ICO or another supervisory authority and have the ability to seek to enforce this right through a judicial remedy. We will not usually charge a fee, however, we reserve the right to charge a reasonable fee if your requests are unreasonable or excessive in nature.

- **The right to object**

The GDPR provides the right for individuals to object to processing in certain circumstances:

1. The processing is based on legitimate interest or the performance of a task in the public interest/exercise of official authority, including profiling
2. The processing is for the purposes of direct marketing, including profiling, and
3. The processing is for the purposes of scientific/historical research and statistics.

- The GDPR states that we must stop processing if you object, unless:

1. We are able to demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the individual, or
2. If the processing is for the establishment, exercise or defence of legal claims. We will respond to your request without undue delay. If we have decided not to uphold your objection to the processing of your data, you will have the right to to make a complaint to the ICO or another supervisory authority and have the ability to seek to enforce this right through a judicial remedy.

- **Rights in relation to automated decision making and profiling.**

Ashton on Mersey SCITT do not use automated decision making or profiling. All data is handled by our staff and all decisions are made with human involvement. We have decided, however, to provide the information to you. **What is automated decision making and profiling?**

Automated decision making is making a decision solely by automated means without any human involvement. Profiling is the automated processing of personal data to evaluate certain things about an individual, and can be part of an automated decision making process. The GDPR applies to both and has additional rules to protect individuals from organisations using solely automated decision making that has legal or significant effects on them. This type of processing can only be used where the decision is:

1. Necessary for the entry into or performance of a contract, or
2. Authorised by Union or Member State law applicable to the controller, or
3. Based on the individual's explicit consent. If processing falls under automated decision making and/or profiling, you must be provided with information about the processing, given simple ways to request human intervention or challenge decisions and the controller must carry out regular checks to ensure that systems are working as intended.

Contacts

The Dean Trust Data Protection Officer

Tel: 0161 273 1179

Email: dpo@thedeantrust.co.uk

ICO

For independent advice about data protection, privacy and data sharing issues, you can contact the Information Commissioner's Office (ICO) at:

Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) **or** 01625 545 745 if you prefer to use a national rate number

Alternatively, visit ico.org.uk or **email** casework@ico.org.uk.