

Associate Teacher Privacy Notice

Keele and North Staffordshire Teacher Education ('KNSTE') collects a lot of data and information about our Associate Teachers ('ATs') so that we can run our teacher training programme effectively. This privacy notice explains how and why we collect ATs' data, what we do with it and what rights ATs have.

KNSTE is a school centred initial teacher training provider (SCITT) within the Shaw Education Trust ("the Trust"), a multi academy trust with numerous academies. The Trust is a charitable company limited by guarantee (registration number 09067175) whose registered office is The Lodge Wolstanton High, Milehouse Lane, Newcastle Under Lyme, Staffordshire, England, ST5 9JU. The Trust is the Data Controller for all the academies within the Trust and the SCITT.

The Data Protection Officer for the Trust is Natalie Kennedy, natalie.kennedy@shaw-education.org.uk.

Why do we collect and use associate teacher information?

We collect and use associate teacher information under the following lawful bases:

- a. where we have the consent of the data subject (Article 6 (a));
- b. where it is necessary for compliance with a legal obligation (Article 6 (c));
- c. where processing is necessary to protect the vital interests of the data subject or another person (Article 6(d));
- d. where it 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 6 (e)).

Where the personal data we collect about ATs is sensitive personal data, we will only process it where:

- a. we have explicit consent;
- b. processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent; and / or
- c. processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Please see our Data Protection Policy for a definition of sensitive personal data.

We use the AT data to fulfil our legal requirements and to support the application process and delivery and administration of the course, in part, but not limited to, the following:

- a. to decide who to offer a place to on the course;
- b. to support AT learning in connection with PGCE and QTS awards;
- c. to monitor and report on AT progress;
- d. to provide appropriate pastoral care;
- e. to assess the quality of our services;
- f. to comply with the law regarding data sharing;
- g. for the protection and welfare of ATs and others in our partnership schools;
- h. for the safe and orderly running of the programme;
- i. to promote the SCITT;
- j. in order to respond to investigations from our regulators or to respond to complaints raised by our stakeholders;
- k. in connection with any legal proceedings threatened or commenced against the SCITT

The categories of Associate Teacher information that we collect, hold and share include:

Associate Teacher Privacy Notice

- a. Personal information (such as name, address, unique UCAS and SLC reference);
- b. Characteristics (such as ethnicity, medical conditions, nationality, country of birth)
- c. Attendance information (such as sessions attended, number of absences and absence reasons)
- d. Assignment and assessment point data
- e. Safeguarding checks including those pertaining to disqualification by association.
- f. Referee statements
- g. Photographs

This data may be obtained through requests for information including, but not limited to, the following:

- Passport, National Insurance or driving licence
- Recent utility bill/bank statement/council tax bill (proof of address)
- Proof of your qualifications
- Completed DBS declaration

From time to time and in certain circumstances, we might also process personal data about ATs, some of which might be classed as “special categories” of more sensitive personal information. For example, information about criminal proceedings/convictions is collected in respect of determining an individual’s suitability to teach.

Child protection/safeguarding information is routinely collected about ATs but is only likely to be processed by the SCITT in specific circumstances relating to particular ATs, for example, if a protection issue arises or if an AT is involved in a criminal matter. Where appropriate, such information may be shared with external agencies such as the child protection team at the Local Authority, the Local Authority Designated Officer and/or the Police. Such information will only be processed to the extent that it is lawful to do so and appropriate measures will be taken to keep the data secure.

In order to fulfil statutory duties in respect of determining your fitness to teach, we also collect medical information through the form of an Occupational Health medical check. We also collect information about disabilities through completion of a disclosure.

We collect information about ATs when they join the programme and update it during their time on the course as and when new information is acquired.

Collecting Associate Teacher information

Whilst the majority of AT information you provide 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 whether you are required to provide certain AT information to us or if you have a choice in this. Where appropriate, we will ask ATs for consent to process personal data where there is no other lawful basis for processing it, for example where we wish to use photos or images of ATs on our website or on social media to promote school activities, or if we want to ask your permission to use your information for marketing purposes. ATs may withdraw consent at any time.

In addition, some of our partner schools use CCTV cameras around their school site for security purposes and for the protection of staff, associate teachers and pupils. CCTV footage may be referred to during the course of disciplinary procedures (for staff or associate teachers) or to investigate other issues. CCTV footage involving associate teachers will only be processed to the extent that it is lawful to do so. Please see the CCTV policy implemented at the site you are located at for more details.

Associate Teacher Privacy Notice

Storing Associate Teacher data

In most cases we hold AT data for six years after the completion of the programme. We may also keep it longer if this is necessary in order to comply with our legal obligations.

We have a data retention policy which sets out how long we must keep AT data for. If you would like a copy of our retention policy please forward a request by email to: gdpr@knste-shaw.org.uk

A significant amount of personal data is stored electronically, for example, on our database. KNSTE uses a number of IT systems and servers, such as:

- Office 365 is a cloud based system provided by Microsoft. They have many servers all over the world; however, Microsoft are fully compliant with data protection requirements.
- A restricted area on an administration server located at Seabridge Primary School, Roe Lane, with support provided by Manor Computers, who fully comply with data protection requirements.
- A VLE, a Moodle based system stored in encrypted format on one of the servers run in 1&1's several data centres located in Europe and the United States of America.

Data stored electronically may be saved on a cloud based system which may be hosted in a different country. Personal data may be transferred to other countries if, for example, we are arranging a trip to a different country. Appropriate steps will be taken to keep the data secure.

Any information stored electronically or in hard copy will be done so in accordance with the Data Protection Policy.

Who do we share Associate Teacher information with?

We routinely share associate teacher information with:

- the Department for Education (DfE);
- KNSTE Strategic Board
- our partner schools (see list below);
- the central team at the Trust;
- Keele University;
- Student Loan Company.
- Ofsted

Where appropriate, we share AT information with the following lead schools and their partner schools:

- Blackfriars Academy
- Hempstalls Primary School
- Seabridge Primary School
- St Mary's Catholic Academy Norton
- Painsley Catholic College
- Societas Multi Academy Trust
- Parkside Primary School
- City Learning Trust
- St Mary's C of E (A) Primary School, Tunstall

From time to time, we may also share AT information with other third parties including the following:

- the Police and law enforcement agencies;
- Occupational Health;
- Courts, if ordered to do so;

Associate Teacher Privacy Notice

- the National College for Teaching and Learning/DfE;
- Prevent teams in accordance with the Prevent Duty on schools;
- our HR providers, for example, if we are seeking HR advice and an AT is involved in an issue;
- UCAS;
- I&I;
- external providers and session teachers;
- our legal advisors;
- our insurance providers/the Risk Protection Arrangement.

Some of the above organisations may also be Data Controllers in their own right in which case we will be jointly controllers of your personal data and may be jointly liable in the event of any data breaches.

In the event that we share personal data about ATs with third parties, we will provide the minimum amount of personal data necessary to fulfil the purpose for which we are required to share the data.

Why we share Associate Teacher information

We do not share information about our ATs with anyone without consent unless the law allows us to do so.

We share AT data with the Department for Education (DfE) on a statutory basis.

Data collection requirements:

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the ITTcensus) go to <https://www.gov.uk/government/collections/initial-teacher-training>

The DfE has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data;
- the purpose for which it is required;
- the level and sensitivity of data requested; and
- the arrangements in place to store and handle the data.

To be granted access to AT information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

To contact DfE: <https://www.gov.uk/contact-dfe>

Requesting access to your personal data

Under data protection legislation, ATs have the right to request access to information about them that we hold ("Subject Access Request").

Subject to the section below, the legal timescales for the SCITT to respond to a Subject Access Request is one calendar month. As the SCITT has limited staff resources outside of term time, we encourage ATs to submit Subject Access Requests during term time and to avoid sending a request during periods when the SCITT is closed or is about to close for the holidays where

Associate Teacher Privacy Notice

possible. This will assist us in responding to your request as promptly as possible. For further information about how we handle Subject Access Requests, please see our Data Protection Policy.

You also have the right to:

- object to processing of personal data 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 data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the our data protection responsibilities.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Contact:

If you would like to discuss anything in this privacy notice, please contact:

- Natalie Kennedy, DPO, via Natalie.kennedy@shaw-education.org.uk