

# Pickwick Academy Trust



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

**Last reviewed: February 2021**    **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 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 Data Protection Officer at:

[dpo@pickwickacademytrust.co.uk](mailto:dpo@pickwickacademytrust.co.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, photos, and video recordings.

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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; and
- 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.

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## **Lawful Basis for processing personal information**

There are several reasons why we hold, process, and share personal information. Under data protection laws, the lawful reasons for processing personal information include:

- Consent.
- For the performance of a contract.
- To comply with a legal obligation.
- To protect the vital interests of the trainee or another person.
- For a task carried out in the public interest.
- For a legitimate interest of the school or one of the organisations it shares data with except where those rights are overridden by the interests or fundamental rights and freedoms of the data subject.

### **Consent**

We may ask for your consent to use your information in certain ways, such as publicity of photographs on marketing materials including our website. If we ask for your consent to use your personal information, you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid.

### **Performance of a contract**

On some occasions, the school will process trainee personal information for the performance of a contract.

### **Legal obligation**

This is where we need to use trainee personal information to comply with a legal obligation.

Statutory reporting requirements to the Department for Education (DFE) are included within this section. As is disclosing information to third parties such as the courts or the police where we are legally obliged to do so.

### **Vital interests**

This legal basis can be used where, for example, we need to disclose information about a trainee teacher in an emergency medical situation.

### **Public interest**

We consider that we are acting in the public interest when providing education.

Specifically, we have a public interest in:

- Providing an education.
- Fulfilling our safeguarding obligations and investigating complaints that may be directly connected with you or may require access to your personal information when investigating complaints by others.
- Promoting the interests of the school.
- Managing the school efficiently.

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

We use trainee personal information to:

- Support learning.

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- 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 data retention policy. 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 Data Protection Officer: [dpo@pickwickacademytrust.co.uk](mailto:dpo@pickwickacademytrust.co.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 Data Protection Officer on [dpo@pickwickacademytrust.co.uk](mailto:dpo@pickwickacademytrust.co.uk).

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**Last updated:**

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated on 1<sup>st</sup> March 2021.

**Contact:**

If you would like to discuss anything in this privacy notice, please contact the Data Protection Officer on [dpo@pickwickacademytrust.co.uk](mailto:dpo@pickwickacademytrust.co.uk). Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>