Burdett-Coutts

PRIVACY NOTICE

TRAINEE

How we use trainee information

Under General Data Protection Regulations (GDPR) we are obliged to inform you of the information we hold on you, as a trainee in our school, including what we use it for, who we share it with, and for how long we keep it.

This privacy notice (also known as a fair processing notice) aims to provide you with this information. If it, or any information linked to is unclear, please contact the school office, or the school's Data Protection Officer.

Contact details for both are available at the end of this privacy notice.

We, Burdett-Coutts & Townshend Foundation CE Primary School, Rochester Street, London SW1P 2QQ are the Data Controller for the purposes of data protection law.

As a public body, we have appointed a Data Protection Officer, Mr John Pearson-Hicks (email john.pearson-hicks@london.anglican.org or call 07540 062413).

1. The categories of information that we collect, hold and share include but are not limited to:

- Personal information (such as name, address, national insurance number).
- Contact details and preference (contact telephone numbers, email addresses, addresses)
- Characteristics (such as ethnicity, religion, language, nationality, country of birth)
- The terms and conditions of your employment if a paid trainee, including information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- Details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the organisation;
- Details of your bank account and national insurance number;
- Information about your marital status, next of kin, dependants and emergency contacts;
- Information about your entitlement to work in the UK (where applicable);
- Information about your criminal record;
- Details of your schedule (days of work and working hours) and attendance at school;
- Details of periods of leave or absence taken by you
- Assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence;
- Information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments and fulfil its duty of care (including the use of Occupational Health Services);
- Photographs (for internal safeguarding & security purposes, school newsletters, media and promotional purposes).
- CCTV images

We may also hold personal data about you from third parties, such as references supplied by former employers, information provided during the completion of our pre-employment checks (where applicable), your application to your training centre, and from the Disclosure & Barring Service, in order to comply with our legal obligations and statutory guidance.

2. Why we collect and use this information

The purpose of collecting and processing this data is to help us recruit trainees and run the school efficiently, including to:

- Enable you to be paid and other benefits be provided (where applicable)
- Fulfil our legal obligations towards safeguarding pupils
- Support effective performance management and appraisal and development of trainees
- Provide feedback to your training centre and awarding body
- Provide references where requested
- Equalities monitoring and reporting
- To assess the quality of our services
- To comply with the law regarding data sharing

3. The lawful basis on which we use this information

Our lawful basis for collecting and processing your information is defined under Article 6, and the following sub-paragraphs in the GDPR apply:

- (a) Data subject gives consent for one or more specific purposes.
- (c) Processing is necessary to comply with the legal obligations of the controller.
- (e) Processing is necessary for tasks in the public interest or exercise of authority vested in the controller (the provision of education).

Our lawful basis for collecting and processing your information is also further defined under Article 9, in that some of the information we process is deemed to be sensitive, or special, information and the following sub-paragraphs in the GDPR apply:

- (a) The data subject has given explicit consent.
- (b) It is necessary to fulfill the obligations of controller or of data subject.
- (c) It is necessary to protect the vital interests of the data subject.
- (d) Processing is carried out by a foundation or not-for-profit organisation (includes religious, political or philosophical organisations and trade unions)

A full breakdown of the information we collect on trainees can be found by contacting the DPO.

Where we have obtained consent to use trainee members' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn. Some of the reasons listed above for collecting and using your personal data overlap, and there may be several grounds which justify our use of this data.

4. Collecting trainee 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 the General Data Protection Regulation, we will inform you whether you are required to provide certain information to us or if you have a choice in this. Where we have obtained consent to use your personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

5. Storing your data

We create and maintain a file for each trainee. The information contained in this file is kept secure and is only used for purposes directly relevant to your placement with us. Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our retention policy.

Please refer to our Data Storage and Retention Policy for further information.

We have data protection policies and procedures in place, including strong organisational and technical measures, which are regularly reviewed.

6. Who we share information with

We routinely share information with appropriate third parties, including:

- Your training centre
- Your awarding body
- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information relating to certain other matters
- The Department for Education
- Educators and examining bodies
- Ofsted

- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Central and local government
- Professional advisers and consultants – for us to develop our service to best provide our public service
- Police forces, courts, tribunals
- Employment and recruitment agencies
- Future employers

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

7. Why we share your information

We do not share information about you with anyone without consent unless the law and our policies allow us to do so. We only share your information with your training provider in order to provide you with the best possible support.

8. Data collection requirements:

Our data collection requirements relate to our contractual obligations with the training centres with which we work. Further details are available on request.

9. Requesting access to your personal data and your Data Protection Rights

Under data protection legislation, trainees have the right to request access to information about them that we hold, through a Subject Access Request. If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child

- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please address them to John Pearson-Hicks, Data Protection Officer on 07540 062413 or emailing john.pearson-hicks@london.anglican.org.

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 Data Protection regulations

10. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact John Pearson-Hicks, Data Protection Officer on 07540 062413 or emailing john.pearson-hicks@london.anglican.org.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at https://ico.org.uk/concerns/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office,
  Wycliffe House, Water Lane,
  Wilmslow, Cheshire,
  SK9 5AF