



PRIVACY NOTICE FOR ENFIELD TEACHING SCHOOL ALLIANCE

Bowes Primary School is part of a Multi Academy Trust (MAT) known as Enfield Learning Trust (ELT). The Board of Trustees and the Local Governing Board, works to ensure that they deliver the very best education for our children.

Bowes Primary School is committed to protecting the privacy 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 contacts, employees and contractors, but does not form part of any contract of employment to provide services.

Enfield Teaching School Alliance is part of Bowes Primary School. For the purposes of data protection legislation, Enfield Learning Trust is the data controller. This means that it is responsible for deciding how personal information about you is held and used.

The postal address of the Trust is: Hazelbury Primary School, Hazelbury Road, Edmonton, London N9 9TT

The Data Protection Officer for the Trust can be contacted at ann.smith@enfieldlearningtrust.org

Enfield Teaching School Alliance is also a data processor. A data processor processes data on behalf of a data controller.

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.

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 purpose 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 data which require a higher level of protection. These are data about ethnic origin, political opinions, religious beliefs, trade union membership, health, sex life, criminal proceedings or convictions, genetic or biometric data. As a Teaching School Alliance, it is highly unlikely that we would capture any “special category” data, unless disclosed via a teacher training application through UCAS.

Teacher Training Applicants, Trainees, NQTs, and others enrolled on Enfield Teaching School Alliance courses.

The personal data we hold regarding teacher training applicants, initial teacher training trainees; newly qualified teachers and others enrolled on our courses may include data provided by applicants on their application forms and any later relevant data received subsequently such as information regarding additional qualifications; additional contact details. We also hold employment location data (which schools NQTs work in) and progress data as part of our provision of NQT CPD and in our role as an Appropriate Body for our own use to monitor the course

Depending on the nature of your working relationship with us, we will collect, store, and use any of the following categories of personal information about you, but is not restricted to:

- Personal contact details such as name, title, addresses, telephone numbers, and email addresses.
- Job title.
- School / College name (Location of employment or workplace).
- School / College address, phone number.
- Additional school contracts.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter as part of the application process).
- References
- Business email address.
- Payment information.
- Information for market research.
- Copy of Driving License/Passport/Identity documents.

- Any other information obtained through electronic means.
- Information about your use of our information and communication systems.
- Photographs.
- Attendance information
- Safeguarding information

We may also hold data about trainees that we have received from other organisations, including other schools, our university partners and the Department for Education.

For Recruitment to Teacher Training programmes, we will collect, store, and use any of the following categories of personal information about you:

- Date of Birth.
- Gender.
- Marital status and dependents.
- Employment records (including job titles, work history, working hours, training records and professional memberships).
- Next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information.
- Start date.
- Location of employment work place.
- Copy of driving license/Passport/Identity documents.
- Progress data, results of internal assessments and externally set tests; action plans
- Other information obtained through electronic means.
- Details of any medical conditions, including physical and mental health
- Information about your use of our information and communications systems.
- Photographs.

How is your personal information collected?

We collect personally identifiable information about you (your “Data”) through:

- The use of enquiry and registration forms.
- When you purchase any of our products or services
- The provision of your details to us either online or offline
- Through the teacher training application and recruitment process, either directly from candidates or sometimes from UCAS or an employment agency. We may sometimes collect additional information from third parties including former employers.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us or training with us.

Why we use this data

We use this data to:

- Support appropriate trainee selection
- Support trainee learning
- Monitor and report on trainee progress
- Provide appropriate pastoral care
- Protect trainee welfare
- Assess the quality of our services
- Carry out research
- Comply with the law regarding data sharing

Our legal basis for using this data

We will only use trainee personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

We only collect and use trainee personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest

Less commonly, we may also process trainees' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use a trainee's 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 trainee's personal data overlap and there may be several grounds which justify our use of this data.

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 all).

Change of purpose

We will only use your personal information for the purpose 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 if required 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. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how to go about withdrawing consent if you wish to do so. Withdrawal of consent does not render any processing carried out before the withdrawal unlawful.

How we store this data

Teacher Training applications are stored securely on the school's secure server in a folder with access restricted to key Teaching School staff only; and in paper files retained in a locked archive for 3 years.

We retain trainee application forms while they are training with Enfield Teaching School Alliance. We may also keep it beyond their attendance in Bowes Primary School Teaching Alliance, initial teacher training if this is necessary in order to comply with our legal obligations.

Data sharing

We share trainee applications to the school identified by the trainee as their preferred host school and the relevant partner university. We only share such applications with other schools with the consent of the trainee.

We do not share information about trainee with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with the General Data Protection Regulation, otherwise known as the GDPR) we may share personal information about trainees with:

- The Department for Education (e.g. year-end reporting)
- ELT Auditors (financial assurance/required mandatory audits on teaching school funding)
- Our partner university on the relevant course and examining bodies (e.g. Teacher Regulation Agency).
- Our regulators Ofsted, DFE and the ESFA (e.g. trainee data)

We may have to 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 and 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.

All our third-party service providers are required to take appropriate security measures to protect your personal information. We do not allow our third-party 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.

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 business need to know. They will only process your personal 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.

Transferring data internationally

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.

Individuals rights regarding personal data

Individuals have a right to make a **'subject access request'** to gain access to personal information that the Teaching School holds about them.

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
- 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.

Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact the Headteacher.

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 the school in the first instance.

To make a complaint, please contact the Head of the Teaching School (Enfield Teaching School Alliance).

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

For more information about your rights is available in the School's data protection policy, which is available on the School website.

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 email the school office, office@bowesprimaryelt.org.