# AA Teamworks SCITT: Privacy Policy, Cookies Policy and Terms and Conditions

Under data protection law, individuals have a right to be informed about how AA Teamworks West Yorkshire SCITT (part of Great Heights Academy Trust) uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

The first part of this privacy notice explains how we collect, store, and use personal data about individuals that visit our website. The second part of the notice explains how we collect, store, and use personal data about individuals we employ, engage as trainee teachers, or otherwise engage to work with us.

Great Heights Academy Trust are the 'data controller' for the purposes of data protection law. Our data Protection Officer can be contacted at: <a href="mailto:info@thedpadviceservice.co.uk">info@thedpadviceservice.co.uk</a>.

#### Website users

### 1. Personal data we process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

Purpose	Data (Key elements)	Basis
Website Functionality	Website activity collected through cookies.	Legitimate interests - it is necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you would expect, such as the use of Google Analytics

# 2. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy.

For example, we may use your personal information to:

- Reply to enquiries you send to us.
- Handle any transactions that you initiate.

# 3. When we share your data

We will not normally share any information we hold about you with others without your prior consent, unless one of the following exceptions apply. We will only pass your data to third parties in the following circumstances:

- You have provided your explicit consent for us to pass data to a named third party.
- We are using a third party purely for the purposes of processing data on our behalf and
  we have in place a data processing agreement with that third party that fulfils our legal
  obligations in relation to the use of third-party data processors; or

• We are required by law to share your data.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

# 4. How long we keep your data

We will retain your information for as long as you are registered with us. You may request at any time for your information to be removed from our database or to change the way you are contacted (See the Rights you have to your data section below). Even if your information is removed from our database, some personal information will continue to be archived in line with HRMC or other legal regulations, or to continue providing you with a service you are currently using.

## 5. Rights you have over your data

As an individual, you have control over what information we hold about you, how it is used and whether you are happy for us to keep it. General Data Protection Regulation (GDPR) states that you have a range of rights over your data, which includes the following:

- The right to be informed to know what information we collect about you and why. This Privacy Policy is in response to this right.
- The right of access to see what information we hold about you and to verify the lawfulness of our processing of your data.
- The right to rectification to rectify the information we hold if it is incomplete or inaccurate.
- The right to erasure "to be forgotten"; to have your information removed.
- The right to restrict processing to change the way in which we use your data.
- The right to data portability to obtain your information in order to transfer it to another service or organisation.
- The right to object; and to object to the way in which we are using your data.
- The right not to be subjected to automatic decision-making including profiling to have your information removed from any databases subject to automatic decision-making processes.

To exercise any of your rights regarding your personal information, please contact the admin at <a href="mailto:enquiries@teamworksscitt.org">enquiries@teamworksscitt.org</a>

#### 6. Cookies and usage tracking

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, e.g. remembering your preferences, recording what you have put in your shopping basket and counting the number of people looking at a website.

Where cookies are used to collect personal data, we list these purposes in section 1 above, along with other personal data that we collect. However, we also use some cookies that do not collect personal information but that help us collect anonymous information about how people use our website. We use Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers and devices. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>

## 7. The use of this website is subject to the following terms of use

- The content of the pages of this website is for your general information and use only. It is subject to change without notice.
- This website uses cookies to monitor browsing preferences. If you do allow cookies to be used, the following personal information may be stored by us for use by third parties: Your IP Address, your country of access, your time spent on our website and content you have viewed.
- Neither we nor any third parties provide any warranty or guarantee as to the accuracy, timeliness, performance, completeness or suitability of the information and materials found or offered on this website for any particular purpose. You acknowledge that such information and materials may contain inaccuracies, or errors and we expressly exclude liability for any such inaccuracies or errors to fullest extent permitted by law.
- Your use of any information or materials on this website is entirely at your own risk, for
  which we shall not be liable. It shall be your own responsibility to ensure that any
  products, services or information available through this website meet your specific
  requirements.
- This website contains material which is owned by or licensed to us. This material includes, but is not limited to, the design, layout, look, appearance and graphics. Reproduction is prohibited other than in accordance with the copyright notice, which forms part of these terms and conditions and the overall privacy policy.
- All trademarks reproduced in this website, which are not the property of, or licensed to the operator, are acknowledged on the website.
- Unauthorised use of this website may give rise to a claim for damages and or be a criminal offence.
- From time to time, this website may also include links to other websites. These links are provided for your convenience to provide further information. They do not signify that we endorse the website(s). We have no responsibility for the content of the linked website(s).
- Your use of this website and any dispute arising out of such use of this website is subject to the laws of England, Northern Ireland, Scotland and Wales.

#### 8. Copyright Notice

This website and its content is the copyright of **AA Teamworks SCITT**. All rights reserved. Any redistribution of part or all of the contents in any form is prohibited other than the following:

- You may print or download to a local hard disk extracts for your personal use and non-commercial use only.
- You may copy the content to individual third parties for their personal use, but only if you acknowledge the website as the source of the material.

You may not, except with our express written permission, distribute or commercially exploit the content. Nor may you transmit it or store it in any other websites or form of electronic retrieval system.

# 9. Website Disclaimer

The information contained in this website is for general information purposes only. The information is provided by **AA Teamworks SCITT** and while we endeavour to keep the information up to date and correct, we make no representations or warranties of any kind, express or implied, about the completeness, accuracy, reliability, suitability or availability with respect to the website or the information, products, services or related graphics contained on

the website for any purposes. Any reliance you place on such information is therefore strictly at your own risk.

In no event will we be liable for any loss or damage including without limitation, indirect or consequential loss or damage, or any loss or damage whatsoever arising from loss of data or profits arising out of, or in connection with, the use of this website.

Through this website you are able to link to other websites which are not under the control of **AA Teamworks SCITT**. We have no control over the nature, content and availability of those sites. The inclusion of any links does not necessarily imply a recommendation or endorse the views expressed within them.

Every effort is made to keep the website up and running smoothly. However, AA Teamworks SCITT takes no responsibility for, and will not be liable for, the website being temporarily unavailable due to technical issues beyond our control.

# 10. Security Certificate

All transactions on <a href="https://aateamworksscitt.org/">https://aateamworksscitt.org/</a> are carried out over an SSL Encrypted secure connection. We do this using industry standard technology. The padlock symbol, next to the URL in your browser window confirms this level of encryption.

## **Trainees and Partners**

## 1. Personal data we process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

Purpose	Data (Key elements)	Basis
Trainees and Partners	Data relating to those we employ, engage as trainees or otherwise engage, to work with or at our teacher training provision.	In order to fulfil a contract we have entered into with you, to comply with a legal obligation or to carry out a task in the public interest.

# 2. Personal data we hold

We process data relating to those we employ, engage as trainee teachers or otherwise engage to work with or at AA Teamworks West Yorkshire SCITT. Personal data that we may collect, use, store, and share (where appropriate) about you includes, but is not restricted to:

- Contact details
- Date of birth, marital status and gender
- Next of kin and emergency contact details
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references, and other information included in a CV, cover letter, personal statement or as part of the DfE Apply application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information

- Outcomes of any disciplinary and / or grievance procedures
- Absence and attendance data
- Copy of passport and driving licence
- Photographs
- CCTV footage
- Data about your use of the school's information and communications system

We may also collect, store and use information about you that falls into 'special categories' of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Health, including any medical conditions, and sickness records

## 3. Why we use this data

The purpose of processing this data is to help us run our provision, including to:

- Register trainee teachers (and generate unique Teacher Reference Numbers (TRNs)) on the DfE Register Trainee Teachers portal
- Ensure compliance with the DfE ITT compliance criteria
- Complete DfE grant audit assurance processes including external audit and annual certification of expenditure and any sampling carried out as part of the funding stream
- Enable trainees (where relevant) to be paid a salary, bursary or scholarship depending on programme and eligibility
- Facilitate safer recruitment, as part of our safeguarding obligations towards pupils and partner schools
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable equalities monitoring
- Improve the management of workforce/trainee data across the sector
- Provide references

# 4. Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

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 you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify our use of your data.

## **5. Collecting this information**

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

#### 6. How we store this data

We create and maintain training files for each trainee teacher. The information contained in this file is kept secure and is only used for purposes directly relevant to your training. When your training with us has ended, we will retain this file for 6 years and delete the information in it in accordance with the Great Heights Academy Trust Records Management and Retention Policy.

#### 7. Who we share information with

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so. Where it is legally required or necessary (and it complies with data protection law), we may share personal information about you with:

- Schools in which you will have / are having a training experience
- Our local authority to meet our legal obligations to share certain information with it, such as safeguarding concerns
- The Department for Education (DfE)
- The qualification awarding bodies
- Ofsted
- Suppliers and service providers to enable them to provide the service we have contracted them for
- Professional advisers and consultants for us to develop our service
- Our auditors
- Police forces, courts or tribunals
- Health and Safety executives
- Future employers
- Your next of kin

## 8. Transferring data internationally

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

## 9. How to access personal information we hold about you

Individuals have a right to make a 'subject access request' to gain access to personal information that AA Teamworks SCTT 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 the information
- Tell you why we are holding it 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

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our Data Protection Officer.

# 10. Your other rights regarding your data

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

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for 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, 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 our Data Protection Officer.

#### **Modifications**

We may modify this Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we will notify people whose personal data we hold is affected.

If you would like to discuss anything in this privacy notice, please contact us at <a href="mailto:enquiries@teamworksscitt.org">enquiries@teamworksscitt.org</a>.

## **Complaints**

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

If you think 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 our Data Protection Officer (DPO) – The DP Advice Service Ltd

<u>info@thedpadviceservice.co.uk</u> www.thedpadviceservice.co.uk

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

Report a concern online at: <a href="ico.org.uk/make-a-complaint/">ico.org.uk/make-a-complaint/</a>.

Call: 0303 123 1113

Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.