

WHO PROCESSES YOUR INFORMATION?

Star Academies is the *Data Controller* of the personal information you provide to us. This means it determines the purposes for which, and the manner in which, any personal data relating to SCITT students is to be processed.

The Head of Governance and Corporate Services is our *Data Protection Officer*. The Data Protection Officer's role is to oversee and monitor our data processing practices. If you have any queries regarding anything in this privacy notice, please contact:

Head of Governance and Corporate Services

Data Protection Officer

Star Academies

Shadsworth Road

Blackburn, BB1 2HT

or email regulatory@staracademies.org

Where necessary third parties may process personal information. Where this is required, Star Academies places data protection requirements on third party processors to ensure data is processed in line with privacy rights.

WHY DO WE NEED YOUR INFORMATION?

The overarching reason that we collect data is to enable your period of training and assessment; we also use data:

- to manage recruitment processes and respond to reference requests;
- to enable school-based training;
- for registration purposes e.g. PGCE/Department for Education and recommendations for QTS;
- to monitor protected characteristics in order to promote equality at work;
- to keep records of trainee performance and work/placement history;
- to manage trainee experience and training and progression
- to compile the career entry development profile;
- to manage absence effectively, including obtaining advice from occupational health providers about health conditions to ensure compliance with employment and health and safety law;
- to defend legal claims;
- to enable individuals to be paid.

INFORMATION THAT WE COLLECT, PROCESS, HOLD AND SHARE INCLUDES:

We process data relating to those completing their Initial Teacher Training at Star Academies' SCITT, Star Institute. Personal data that we may collect, process, hold and share (when appropriate) about you includes, but is not restricted to:

- relevant dates relating to training/assessment;
- all UCAS application form data;
- all recruitment data, including right to work in the UK information;
- personal information (i.e. name, title, addresses, domicile, date of birth);
- contact details (i.e. telephone numbers, personal and institute email addresses);
- characteristics (i.e. gender);
- financial information (i.e. bank account details, bursary and student loans information);

- salary information (i.e. if applicable, for compliance purposes);
- identity documents (i.e. copies of driving licence or passport);
- training, progress and performance information, including the career entry development profile;
- disciplinary, grievance and notice to improve;
- CCTV footage and other information obtained through electronic means such as swipe card records (when on site at Star Teachers training venue);
- information about your use of our information and communications systems, including the online system and Canvas;
- photographs;
- fitness to teach;
- safeguarding checks (i.e. Disclosure and Barring Service clearance, barred list information, disqualification declaration, overseas checks if relevant);
- due diligence checks;
- special categories of data (i.e. race, ethnicity, religious beliefs, political opinions).

WHEN WILL WE SHARE THIS INFORMATION WITH OTHERS

We will only use your information when legally able. Typically, we will use your personal information in the following circumstances:

- where we need to perform the contract we have entered into with you;
- where we need to comply with a legal obligation;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- where we need to protect your interests (or someone else's interests);
- where it is needed in the public interest or for official purposes.

THE LAWFUL BASIS ON WHICH WE PROCESS THIS INFORMATION

- Article 6 1(a) of the GDPR which allows processing that is carried out with the consent of the data subject;
- Article 6 1(b) of the GDPR which allows processing that is necessary for the performance of a contract;
- Article 6 1(c) of the GDPR which allows processing that is necessary to comply with a legal obligation;
- Article 6 1(e) of the GDPR which allows processing that is carried out in the public interest;
- Article 9 2(a) of the GDPR which allows processing that is carried out with the explicit consent of the data subject;
- Article 9 2(b) of the GDPR which allows the processing of special category data that is necessary for carrying out obligations in the fields of employment and social security and social protection law;
- Article 9 2(g) of the GDPR which allows the processing of special category data that is necessary for reasons of substantial public interest;
- Article 9 2(j) of the GDPR which allows the processing of special category data when it is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

Information that is collected on the basis on consent is done so with both the informed consent and explicit consent of the Data Subject. Consent may be withdrawn by a Data Subject at any time.

Star Academies maintains *Records of Processing* that identify the lawful basis on which personal information is processed. If we need to process your personal data for a new purpose we will inform you of any additional processing.

COLLECTING INFORMATION

Whilst the majority of information that you provide to us is mandatory, some of it is provided on a voluntary basis. In order to comply with data protection legislation, we will inform you when your consent is required. Personal data may be obtained and processed from third parties where the law requires us to do so.

STORING INFORMATION

Personal data is stored in line with our Records Management Policy. In accordance with data protection legislation, it is only retained for as long as necessary to fulfil the purposes for which it was obtained, and not kept indefinitely.

Star Academies holds trainee data in your trainee file, in electronic records within our secure IT system including email. We retain most records relating to your training on your trainee file for seven years after your training has ended.

Identity documents obtained for the purposes of undertaking a Disclosure and Barring Service check are only retained until the results of the check have been received.

DATA TRANSFERRED OUTSIDE THE EU

Processors that we use may transfer, and hold, personal data outside of the EU. We will ensure that organisations who process personal data on our behalf only transfer data to countries that the EU deems as having adequate levels of protection in place. Processors that transfer data to the United States must be covered by the EU-US Privacy Shield. If a processor is found to be transferring data to a country that does not have adequate protections, or to an organisation that is not covered by the EU-US Privacy Shield, we will terminate our contract/subscription.

HOW DO WE COLLECT TRAINEE INFORMATION

We collect personal information about trainees through the application and recruitment process. This information is either collected directly from candidates, UCAS applications (including references), and background check providers (The Disclosure and Barring Service and Fitness to Train). Trainees must provide this data to access their training/assessment programme.

We collect additional information concerning training related activities throughout the period of your training with Star Academies.

WHO WE SHARE DATA WITH

We do not share information about our trainees with anyone without consent unless the law and our policies allow us to do so. Where it is legally required, necessary (and it complies with Data Protection legislation), or because a third party processes data on our behalf, we may share personal information about you with:

- Local Authorities
- Department for Education (DfE)
- Ofsted
- Student Loans Company
- Funding Providers (Bursary Services and Scholarship Providers)
- Delivery partners (e.g. Manchester Metropolitan University)
- Police, courts, tribunals
- Teaching Regulation Agency (formerly the National College for Teaching and Leadership)
- Providers of visitor management and access control systems
- Disclosure and Barring Service (DBS) to undertake pre-employment checks and follow up checks during employment
- Office of the Independent Adjudicator (OIA)
- Social Services
- Payroll providers
- Photography or design agencies
- Trade unions or representatives acting on your behalf
- Professional advisers and consultants
- Professional bodies

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- Previous employers in order to undertake pre-training checks (UCAS references)
- Auditors
- Occupational health and wellbeing providers
- Schools
- Management Information Systems (e.g. Capita SIMS, NQT Manager, Safeguarding and accident reporting systems)
- Print Management Software providers
- Providers of online learning resources
- Providers of financial management software

When we appoint third parties to process data on our behalf, the third party is required to process the data lawfully, fairly and in a manner that ensures the data is kept secure, using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and accidental loss.

WHAT ARE YOUR RIGHTS?

As the data subject, you have specific rights in relation to the processing of your data. You have a legal right to:

- Request access to the personal data that Star Academies holds;
- Request that your personal data is amended if it is inaccurate or incomplete;
- Request that your personal data is erased where there is no legal basis for its continued processing;
- Request that the processing of your personal data is restricted;
- Object to your personal data being processed if it is likely to cause, or is causing, damage or distress.

Requests must be submitted to the Data Protection Officer (on the contact details provided). Star Academies also has a *Subject Access Request Form* that may be obtained from Star Institute. Star Academies will consider all requests in line with your legal rights and our legal obligations.

Where the processing of your data is based on your explicit consent, you have the right to withdraw your consent at any time. This will not affect any personal data that has been processed prior to withdrawing consent.

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