HAYBRIDGE SCITT

PART OF THE FOUR STONES

PRIVACY NOTICE

DATE POLICY WAS APPROVED	30.04.2025
DATE POLICY WILL BE REVIEWED	SPRING 2027
MEMBER OF STAFF WITH RESPONSIBILITY FOR REVIEW	Head of IT Services

Purpose of this Privacy Notice

Under the Data Protection Act 2018, individuals have the right to know how organisations use their information.

This Privacy Notice explains how Four Stones Gateway Trust uses information about ITT trainees who attend, or are registered with, Haybridge SCITT. Information that can identify you is called personal data.

It sets out:

- why we use your personal data
- our reasons for using it
- the types of personal data we use
- where we collect it from
- who we may share it with
- your information rights
- who to contact for more information or to raise a concern.

Who we are:

- Four Stones Gateway Trust is the data controller.
- Information Commissioner's Office registration: ZA521971
- Contact: dpo@fourstonesgateway.org.uk

Why we use your data

We use your personal data to:

- deliver your ITT programme and monitor your progress
- help keep trainees and pupils safe
- manage placements and partnership arrangements
- meet legal requirements and Department for Education obligations
- communicate with you, including optional marketing where you have agreed to this.

What data we collect

- contact details and identifiers
- qualifications, employment history and training records
- performance and assessment information
- safeguarding and wellbeing information
- financial information, where applicable
- images, such as photographs or CCTV footage
- special category data, such as health information, race, gender, or membership of professional associations or trade unions, where needed.
- information about your use of the school's information and communication systems.

Where necessary, we collect, use, store and share information about criminal convictions and offences.

We may also hold criminal offence data received from other organisations, including previous employers, other schools, social services and the Disclosure and Barring Service.

Our lawful basis

We only collect and use your personal information when the law allows us to. We usually do this where we need to:

Purpose	**Basis**
Deliver the ITT programme	Public task
Meet safeguarding duties	Legal obligation
Manage placements	Contract
Equality monitoring	Public task / substantial public interest
Use marketing material or images	Consent

You can withdraw your consent at any time without disadvantage.

Our basis for using special category data.

We only use special category data when we have a lawful basis and one of the conditions for processing set out in UK data protection law. These conditions include where:

- you have given explicit consent for us to use your personal data in a specific way
- we need to meet or exercise a right or obligation relating to employment, social security or social protection law
- we need to protect someone's vital interests, such as their life, and the person cannot give consent physically or legally
- you have already made the information clearly public
- we need it to establish, exercise or defend legal claims
- we need it for reasons of substantial public interest, as defined in legislation
- we need it for health or social care purposes, and the processing is carried out by, or under the direction of, a health or social work professional, or another person with a legal duty of confidentiality
- we need it for public health reasons, and the processing is carried out by, or under the direction of, a health professional or another person with a legal duty of confidentiality
- we need it for archiving, scientific or historical research, or statistical purposes, where this is in the public interest

We only use criminal offence data when we have a lawful basis and a condition for processing under UK data protection law. These conditions include where:

- you have given consent for us to use it in a specific way
- we need to protect someone's vital interests, such as their life, and the person cannot give consent physically or legally
- you have already made the information clearly public
- we need it for legal proceedings, legal advice, or to establish, exercise or defend legal rights
- we need it for reasons of substantial public interest, as defined in legislation

Collecting this information

Most of the information we collect from you is required, but some information may be optional.
When we ask for information, we will explain whether you must provide it, what may happen if you do not, and whether you have a choice.

How we retain and store this data

- We keep personal information only for as long as needed for the purpose it was collected, or where we are required to keep it by law.
- Retention periods are set out in the Trust Records Management Policy and Retention Schedule, which identifies the types of records we hold, how long we keep them, the reason for the retention period, and what happens when the period ends. For example:
  - Recruitment information: 6 months
  - Training records: in line with statutory guidance
  - Safeguarding records: retained for extended statutory periods

- At the end of the relevant retention period, information is reviewed and securely deleted, destroyed, anonymised or archived, unless we need to keep it for a lawful reason, such as an ongoing safeguarding matter, legal claim, complaint, audit, inspection or information request.

Use of your personal data for marketing purposes

- Where you have given consent, we may contact you by email or text with information about the Trust, SCITT, training events, campaigns, charitable causes or services that may be of interest to you.
- You can withdraw consent at any time without disadvantage, or opt out of these emails or texts at any time by using the unsubscribe link in the communication, or by contacting us.
- We may also use your image in newsletters, posts and other communications about Trust and school activities. These may be published on our websites and social media channels.

Use of your personal data in automated decision-making and profiling

We may use systems that involve automated processing (e.g. safeguarding monitoring tools). These do not make decisions about you without human review

Data sharing

We share data required by law or where it is necessary to perform our public duties. Consent is used only where appropriate. Where we use external providers, they act under contract as data processors under contract and only process data on our instructions.

We may share your personal information with:

- local authorities, where required by law, including for safeguarding concerns and pension processing
- the Department for Education, including for workforce census returns and other statutory data requests
- placement schools
- Birmingham City University
- your family members or emergency contacts, in an emergency
- awarding bodies, for assessment and award purposes linked to your ITT programme
- Ofsted, where needed for statutory requests or inspection activity
- system providers, such as management information system providers
- survey and research organisations
- financial organisations, such as the Student Loans Company
- central and local government bodies, including the Teachers' Pension Scheme or West Midlands Pension Fund
- our auditors, to help us meet statutory obligations relating to ITT training
- trade unions and associations, where they have been appointed to represent you
- health authorities and health or social welfare organisations, where relevant to health and wellbeing
- professional advisers and consultants, such as occupational health or counselling services
- police forces, courts and tribunals, where needed to support legal processes
- professional bodies, where they require information in connection with a legal process
- employment and recruitment agencies, where needed for references or information requested by potential employers or agencies
- public health bodies, where needed to support statutory public health activities.

International Transfers

Where needed, we use safeguards such as UK adequacy regulations or International Data Transfer Agreements (IDTA)

Your Information Rights

Data Protection law provides you with certain rights.

Requesting access to your personal data

You, or someone authorised to act on your behalf, can ask to see the personal information we hold about you. If we hold your information, we will:

- describe the information we hold
- explain why we hold and use it, and how long we will keep it
- tell you where it came from, if we did not receive it from you
- tell you who it has been, or will be, shared with
- tell you if we use it for automated decision-making
- give you a copy of the information.

To request access to your personal information, please contact our Data Protection Officer by email at DPO@fourstonegateway.org.uk or write to: Four Stones Gateway Trust, Love Lane, Cleobury Mortimer, Shropshire, DY14 8PE.

When making a request you should confirm:

- The types of records you wish to access.
- any date periods these relate to

Please address letters: For the attention of the Data Protection Officer.

We may require you to provide proof of your identity before we comply with your request.

Your other information rights:

- **The right to know how your information is used.** We explain this through privacy notices and when we collect your information.
- **The right to correct inaccurate information.** We ask you to check the information we hold and update it when you provide evidence that it has changed.
- **The right to have information deleted.** We delete or remove information when we no longer need to keep it.
- **The right to restrict how your information is used.** We may limit how we use your information while we check its accuracy or consider your request, unless we need to use it for a lawful reason.
- **The right to object to certain uses of your information.** You can object to us using your information for certain purposes, including direct marketing, research or statistics.
- **The right not to be subject to decisions made only by automated systems.** If we use automated systems for important decisions about you, we will tell you and explain how you can ask for a review.

Who to Contact

The Trust has a Data Protection Officer (provided by Services 4 Schools Ltd). Their role is to oversee and monitor our data protection procedures, and to make sure we are compliant with data protection legislation.

The Data Protection Officer is responsible for helping employees and other individuals uphold their information rights. You can contact our Data Protection Officer via email: DPO@fourstonegateway.org.uk , or in writing to: Four Stones Gateway Trust, Love Lane, Cleobury Mortimer, Shropshire, DY14 8PE

Complaints or Concerns

Contact us first: dpo@fourstonesgateway.org.uk
You can also raise a concern with the Information Commissioner's Office at https://ico.org.uk/concerns/

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.