

e-Qualitas Professional Services Limited (eQ) is committed to protecting the privacy and security 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) and Data Protection Act 2019 (the “Data Protection Legislation”).

It applies to all:

- Trainees enrolled on any of our training programmes
- Applicants to any of our training programmes
- Individuals expressing an interest in teacher training through recruitment events
- Individuals expressing an interest in teacher training through email, website or phone enquiry

1. eQ is a “data controller”

eQ provides teacher training services and must process personal data (including sensitive personal data) so that it can provide these services. In doing so, eQ acts as a data controller.

As a data controller, eQ is responsible for deciding how personal information about you is held and used.

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.

2. Data protection principles

We will comply with the Data Protection Legislation. Under GDPR, 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 purposes 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.

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).

3. What information do we hold about you?

We may collect, store and use the following categories of personal information about you:

- Name(s) including title
- Contact details such as addresses, telephone numbers, and email address
- Date of birth
- Gender
- Marital status
- Bank account details (if entitled to a bursary or other payment)
- National insurance no.
- Nationality
- Education history and qualifications
- Work history and references
- Information shared with us by LADOs or the police
- Training record and feedback / assessment and monitoring information
- Placement school feedback
- Photographs
- Attendance information

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race, ethnicity and national identity
- Information about your health, including any medical condition, health and sickness records
- Criminal convictions and barred list information

4. How we collect your personal information

We collect personal information through the application, recruitment and selection process, either directly from individuals, through the application process or from our partner schools. We may sometimes collect additional information from third parties including Student Loans Company. We will collect additional personal information during the course of training-related activities throughout the period of you training with us. We may collect information from third parties in respect of the statutory safer recruitment checks e.g. Disclosure and Barring Service, Teaching Regulation Authority, referees etc. We may also collect publicly available information by way of an online search.

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 data protection legislation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

5. How we will use information about you

We use trainee personal data to:

- assess suitability for teacher training;
- progress applications and carry out necessary vetting / safer recruitment checks;
- run an appropriate training programme and deliver the course for trainees (including training, monitoring, reporting and assessing);
- enable the management of bursaries, grants and funding;
- assess the quality of our training and services;
- provide further support to trainees during their early careers;
- fulfil all legal and regulatory requirements (including carrying out internal audits to demonstrate compliance).

6. The lawful basis upon which we process this information

We will only use your personal information when the law allows us to. Most commonly, 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. It is in the legitimate interests of all parties involved – eQ, the trainee and schools – that eQ can process personal data.

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.

7. If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to provide our services to you, or perform the contract we have entered into with you (such as giving you access to our training courses) or we may be prevented from complying with our legal obligations.

8. Change of purpose

We will only use your personal information for the purposes 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.

9. Consent

We do not need your consent if we use special categories of your personal information in accordance with our written policy 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.

10. Data sharing

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 or where we have another legitimate interest in doing so.

This includes:

- The Lead School in the school partnership
- The school(s) where you work during your training
- The Department for Education
- Ofsted
- Teaching Regulation Authority
- Education and Skills Funding Agency
- Student Loans Company – Tuition Fee, Maintenance Loans and Bursary
- Auditors
- Quality assurance consultants
- Internal and external moderators
- Tutors involved in the provision of your training
- Partner schools within our SCITT partnership
- Organisations carrying out the end point assessment in relation to teaching apprenticeships
- SCITT teams, boards and committees
- Third parties which provide, host and support our IT systems and software (subject to appropriate security measures).
- Third parties in order to carry out the necessary vetting checks (e.g. DBS, TRA, referees)

All our third-party service providers are required to process the data lawfully and fairly and in a manner that ensures appropriate security of the data, using appropriate technical or organisational measures to protect against unauthorised or unlawful processing and accidental loss.

We do not allow our third-party service 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. We will not share any of the information we have received with any third parties for

marketing purposes.

11. Transferring information outside the UK

We will ensure that your personal information receives an adequate level of protection and is treated by those third parties in a way that is consistent with and which respects the UK laws on data protection.

12. 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. The information we receive will be held securely by us and any of our data processors whether the information is in electronic or physical (paper) format.

In addition, we limit access to your personal information to those third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

There are 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.

13. Data retention

Because of storage problems, information about trainees cannot be kept indefinitely, unless there are specific requests to do so. In general, trainee files (including all personal information) will be destroyed and/or irretrievably erased within seven years of the course ending. We will erase any personal information relating to unsuccessful trainee applications at the end of the academic year in which the application was made. Information relating to safeguarding allegations, investigations or concerns relating to a trainee will be retained until the earlier of 10 years from the date of the allegation, or the individual's normal retirement age, whichever is longer.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

14. Rights of access, correction, erasure, and restriction

It is important that the personal information we hold about you is accurate and current.

Please keep us informed if your personal information changes during your working relationship with us.

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”).

- Request correction of the personal information that we hold about you.
- Request erasure of your personal information.
- Object to processing of your personal information.
- Request the restriction of processing of your personal information.
- Request the transfer of your personal information to another party.
- Where the processing of your data is based on your consent, you have the right to withdraw this consent at any time.

If you have a concern about the way that eQ is collecting or using your personal data, you can raise a concern with the Information Commissioner's Office (ICO). The ICO can be contacted on 0303 123 1113, Monday-Friday 9am-5pm.

15. 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 contact Data Protection Officer at DPL@e-qualitas.co.uk. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.