



**Essex & Thames
Primary SCITT**

...putting children first, training excellent teachers

Runwell Community Primary School
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Privacy Notice

ABOUT US

Essex and Thames Primary SCITT is a consortium of 120 primary schools, working together to provide teacher training. Our accreditation is held by one of our lead schools, Runwell Community Primary School.

Our lead schools are:

- Edwards Hall Primary School
- Federation of Greenways Schools
- JFK School
- Powers Hall Academy
- Runwell Community Primary School
- Sheringham Primary School
- Wickford C of E Infants School
- Kelvedon St Mary's Primary School

To apply to our course, you must apply via UCAS to one of our course codes, a list of these can be found [here](#). When you apply using an Essex & Thames course code, you are applying directly to us as the training provider, these are known as our 'core places' and you are providing your data directly to us. For all other codes, you are making an application to the lead school and your data is shared with us to enable us to progress your application. Essex and Thames Primary SCITT hold logins for each lead school and provides the administration for all applications.

Essex and Thames Primary SCITT and all of our schools understand and respect the importance of keeping personal data secure and fully comply with the GDPR. Data is held securely by way of secure systems, including physical and electronic security, access control, passwords and regular audits and checks.

YOUR DATA

Essex and Thames Primary SCITT (“we/us”) is committed to respecting your privacy rights and keeping your data secure. We pledge to handle your data securely, fairly and legally at all times. Essex and Thames Primary SCITT is also dedicated to being transparent about the data that we collect about you and how we use it.

This policy provides you with information about:

- How we use your data;
- What personal data we collect and why;
- How long we hold your data for;
- How we ensure your privacy is maintained; and
- Your legal rights relating to your personal data.

This privacy notice tells you how Essex & Thames Primary SCITT obtains, stores and uses your personal information.

G-SUITE FOR EDUCATION

Essex & Thames Primary SCITT use Google’s G-Suite for Education for the purpose of the administration, day to day running and management of our course. We use G-Suite to hold and process data to enable us to deliver the course and undertake all of our legal and administrative duties. G-Suite for Education is a cloud based system provided by Google. Google has many servers all over the World, and while it is likely that your data is held within our nearest server (Dublin), this cannot be guaranteed. However, Google fully comply with the GDPR and have adequate systems in place. Information of how they achieve this can be found [here](#). In addition, Google can provide state of the art security features, ensuring that your data is held securely at all times. We issue all trainees, partnership schools and any other data processors that we use with an Essex and Thames email provided via G-Suite. This ensures end to end encryption of emails and data sent.

We use G-Suite for Education to hold and process data to enable us to deliver the course and undertake all of our legal and administrative duties.

The next page holds a list of categories of individuals that we hold data about, with links to each section, along with sections of information describing our legal basis for processing and your rights under the GDPR.

Please click on the links below to take you to the section you wish to view:

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APPLICANTS TO OUR COURSE

Essex & Thames Primary SCITT is the data controller for applicants to the course, unless otherwise stated. If you have any questions about the process or how we handle your information, please contact us at dataprotection@thamesprimaryscitt.co.uk.

Applications to our course are made in one of three ways:

- Direct applications, including applications for the AO route;
- Applications directly to Essex & Thames 'core' places via UCAS;
- Applications via one of our Lead schools via UCAS:

Runwell Community Primary School
Edwards Hall Primary School
Federation of Greenways Schools (Learning In Harmony Trust)
JFK School (Learning In Harmony Trust)
Powers Hall Academy (Connected Learning)
Sheringham Primary School (Learning In Harmony Trust)
Wickford C of E Infant School (Herts Academy Trust)
St Mary's Kelvedon Primary School

The administration of Lead School places for the purpose of ITT training has been delegated to Essex & Thames Primary SCITT. Essex & Thames Primary SCITT hold a login for each lead school and download and print your applications from the UCAS secure portal. The information we receive includes your name, address, date of birth, contact details, UCAS ID, Gender, any **disability/special needs**, country of birth, **nationality**, Education history and qualifications, work history, referees and your personal statement. Items highlighted in bold are sensitive data and are subject to enhanced security procedures. We are required to process the data provided for the purposes of safeguarding children and in the public interest, this is set upon us by the DfE and is a legal obligation.

What will we do with the information we receive?

All of the information we receive will only be used for the purpose of progressing your application, and if you are successful, to deliver our course or to fulfil legal or regulatory requirements as necessary. We will use your contact details to contact you to progress your application and will use the other information received to assess your suitability for the course.

We will not share any of the information we have received to any third parties for marketing purposes. The information we receive will be held securely by us and any of our data processors whether the information is in electronic (computerised) or physical (paper) format.

What information do we use and why?

We do not hold more information than we need to to fulfil our stated purposes and will not retain it for longer than is necessary.

The information is used to assess your suitability to train to teach. You have the right to object to our processing of your data, however, this would mean that we would not be able to progress your application any further.

Initial Stage

During the initial stage of the process, your application will be reviewed internally and your details will be added to our database of applicants, stored in Google's G-Suite for Education cloud. Should your application be unsuccessful at this stage, your paper application will be kept on file for 6 months to enable us to provide any feedback that you may wish to receive as an applicant and any details we have entered onto our automated (computerised) system will be held until the first day of the course start date (September each year), at which point the data will be deleted. Our recruitment and administration teams will have access to all of this information. All of our staff are trained in data protection and receive regular training on GDPR compliance. No further processing of your data will take place until the time of deletion.

Sharing of your data:

At this stage we will not be sharing any of your data outside of Essex & Thames Primary SCITT.

Stage two

At this point you will be invited to an interview in one of our partnership schools. In order for us to progress your application further we need to share your full application with the interviewing school Headteacher, along with your basic details (limited to name) to the school administration team and any teaching staff that will be participating during the day. During the day, information will be generated by you and us, for example, interview notes and any tests that you may be asked to complete.

We are required to confirm the identity and proof of address of applicants and evidence of required qualifications. At this point you will be asked to provide the following (copies will be made and held on file):

- Passport or driving licence (photo ID)
- Recent utility bill/bank statement/Council tax bill (proof of address)
- Proof of your qualifications

These are required to enable us to make you an offer of a place, should you be successful.

At the end of the day, all paperwork is returned to the offices of Essex & Thames Primary SCITT, no copies of your data remain at the school in which you were interviewed. Any data that was provided to the school by electronic means is deleted at the end of the interview day.

Sharing of your data:

At this stage we will be sharing your data with school staff within our partnership.

Stage three

Should your application be unsuccessful, we will inform you using your contact details held. Your paper application and all interview documents will be kept on file in full format for 6 months to enable us to provide any feedback you may request. Any details we have entered onto our automated (computerised) system will be held until the first day of the course start date (September each year) at which point they will be anonymised. This data will be held in a format

that does not allow identification of the applicant, and is kept to allow Essex & Thames Primary SCITT to provide required data to the DfE on request. All copies of your ID, proof of address and

qualifications will be securely destroyed at the point of being informed of your application not being successful.

Sharing of your data:

If you were unsuccessful, we will not be sharing your data any further.

Should your application be successful, we will inform you using your contact details held. Your application, interview documents, ID, proof of address and qualifications will be kept of file in full format for 7 years; this period is set by the DfE and is a legal requirement. If you are on the salaried route, we will also require a copy of your contract with your employing school.

At this point, we will require further processing of your information and to collect further information in order to provide the course to you. We will also need to share your information with some third parties:

- We will ask you to complete a criminal records declaration in lieu of your DBS application - this is to ensure that you meet the criteria to train.
- We will provide your details to Essex DBS service in order to complete an enhanced DBS check - this is to ensure safeguarding of the pupils within our partnership schools.
- We will ask you to complete a questionnaire about your health - this is to establish your fitness to train to teach.
- We will ask you to complete a 'working with the under 8s' form - this is to ensure safeguarding of the pupils within our partnership schools.
- We will ask you to complete a barriers to learning form.
- We will ask for emergency contact details - so we know who to contact in case of emergency.
- We may ask for your bank details - this only applies if you are entitled to a bursary or any other payment that we may need to make.
- We will provide your details to our university partner (this only applies if you are completing our PGCE course) - this is to enable your enrollment with the university to provide your qualification and to allow you to submit assessments.
- We will enter your details onto the DfE DMS secure portal - this is to generate your Teacher Reference Number and to notify the DfE that you are entering into the profession.
- We will enter your attendance details onto SLC secure portal if you are in receipt of student finance - this is to enable you and us to receive payments.
- We will use your basic information to provide administrative processes and to deliver the course, such as sign in sheets, grading systems, to provide you with a Essex & Thames email address, to provide you with course content and any other provisions you may need to complete the course.
- For salaried trainees we will require a copy of your contract with your employing school.

- Should any health issue be raised we will need to send your details, including that of your condition, to Occupational Health. This will only be done with your consent.

Sharing of your data:

In order to confirm your place on the course, it is necessary for us to share your data with the following recipients:

- Essex DBS Service
- DfE DMS
- University partner (if applicable)
- Partnership schools - limited to the schools in which you will be training
- Student Finance (if applicable)
- Lloyds Corporate Banking (if applicable)
- Our lecture team
- Our Personal Tutor team
- If any health issues are raised, we may need to make a referral to occupational health.

TRAINEES ON OUR COURSE

Essex & Thames Primary SCITT is the data controller for trainees on the course, unless otherwise stated. If you have any questions about the process or how we handle your information, please contact us at dataprotection@thamesprimaryscitt.co.uk.

What will we do with the information we hold?

All of the information we hold will only be used for the purpose that it was originally collected, that being to enable us to deliver the course or to fulfil legal or regulatory requirements as necessary. We will use your contact details to contact you to for the purpose of your training.

We will not share any of the information we have received to any third parties for marketing purposes. 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.

What information do we use and why?

We do not hold more information than we need to to fulfil our stated purposes and will not retain it for longer than is necessary. The retention period for people that have commenced training is 7 years, this is set by the DfE, this is a legal obligation.

The information we hold includes:

- Your basic information: name, address, date of birth, contact details
- UCAS ID
- Gender
- **Disability, special needs & medical conditions.**
- Country of birth
- **Nationality**
- Education history and qualifications
- Work history & referees
- Your personal statement
- Criminal declaration forms
- DBS check details, including number & issue date - this is to ensure safeguarding of the pupils within our partnership schools
- Medical declaration forms and sick forms issued by your GP - this is to establish your fitness to train to teach and to assure your well being
- Details of results of your Teaching Practice gradings
- Details of your assessment results from the university (PGCE trainees only)
- Email trails - these are deleted instantly, unless the content will form part of your overall file, for example in the event of a support plan or disciplinary issue
- Details of any support plans
- Details of any disciplinary action/issues
- Details of any payments made to you
- Details of any payments received from you
- Details of any invoices which we raise for you
- Details of any SLC payments received in respect of your fees
- Attendance data, including confirming your attendance on SLC
- Passport or driving licence (photo ID)

- Recent utility bill/bank statement/Council tax bill (proof of address)
- Proof of your qualifications
- A copy of your completed Working With The Under 8s form - this is to ensure safeguarding of the pupils within our partnership schools.
- A copy of your completed Barriers to Learning form.
- Your emergency contact details - so we know who to contact in case of emergency.
- Your bank details - this only applies if you are entitled to a bursary or any other payment that we may need to make.
- For salaried trainees we will require a copy of your contract with your employing school.

Items highlighted in bold are sensitive data and are subject to enhanced security procedures. We are required to process sensitive data for the purposes of public interest, this is set upon us by the DfE.

The information is used to deliver your teacher training.

Sharing of your data:

We will be sharing your data with the following recipients:

- DfE DMS.
- University partner (if applicable)
- ESFA (Education and Skills Funding Agency)
- OIA (Office of the Independent Adjudicator) - in the event that you raise a complaint
- Partnership schools - limited to the schools in which you will be training.
- Student Finance (if applicable).
- Lloyds Corporate Banking (if applicable).
- Our lecture team
- Our Personal Tutor team.
- Our auditors
- If any health issues are raised, we may need to make a referral to occupational health.

FORMER TRAINEES

What will we do with the information we hold?

No routine processing of your data is performed and is only held to fulfill our legal obligations, or to help with the fulfilment of a contract on your behalf, for example, when asked to provide a reference for employment.

What information do we hold and why?

We are required to keep information on our former trainees, whether the course was completed or not, this is a legal obligation. The DfE require that your file is kept for 7 years following commencement of the course. Your complete file is made up of a physical (paper) file and electronic records. Data is minimised to the least amount possible and will include:

- Your basic information: name, address, date of birth, contact details (on application form)
- UCAS ID (on application form)
- Gender (on application form)
- **Disability, special needs & medical conditions** (on application form)
- Country of birth (on application form)
- **Nationality** (on application form)
- Education history and qualifications (on application form)
- Work history & referees (on application form)
- Your personal statement (on application form)
- Details of results of your Teaching Practice gradings
- Details of your assessment results from the university (PGCE trainees only)
- Email trails - these are deleted instantly, unless the content will form part of your overall file, for example in the event of a support plan or disciplinary issue
- Details of any support plans
- Details of any disciplinary action/issues
- Details of any payments made to you
- Details of any payments received from you
- Details of any invoices which we raise for you
- Details of any SLC payments received in respect of your fees
- Attendance data, including confirming your attendance on SLC
- Passport or driving licence (photo ID)
- Recent utility bill/bank statement/Council tax bill (proof of address)
- Proof of your qualifications
- A copy of your completed Working With the Under 8s form - this is to ensure safeguarding of the pupils within our partnership schools.
- A copy of your Completed Barriers to Learning form.
- For salaried trainees we will require a copy of your contract with your employing school.

Items highlighted in bold are sensitive data and are subject to enhanced security procedures. We are required to process sensitive data for the purposes of public interest, this is set upon us by the DfE.

Sharing of your data:

At this point, your data will only be viewed by DfE, Ofsted or other government body in the event of an inspection, or to provide a reference for employment.

VISITORS TO OUR WEBSITE

We keep the data collected by our website to the minimum possible, however, some data is collected to enable our website to function correctly, for example, to enable our video on Youtube to work or the interactive pages to display correctly. The website does give each visitor a unique ID, this allows the website to remember the pages you have visited and to provide us with analytics to see how visitors are using our website. We do not use this information outside of the website or for any other purpose. You are able to turn off cookies if you wish, however, some features may not work correctly if you do so.

PEOPLE WHO REGISTER AN INTEREST AT ONE OF OUR RECRUITMENT EVENTS

At our events, we hold a list that you can opt to join to keep informed and up to date on our courses. This data is held on our G-Suite for Education Cloud and will be used to contact you to provide any additional information we have on our courses. You can ask to be removed from this list at any time. The information is limited to name and email address. The information will only be held up until the start date of the course for which you registered an interest, after this the data will be securely destroyed. Your consent is always required in order for us to store and use your data and you have a right to withdraw your consent at anytime.

PEOPLE WHO CONTACT US TO EXPRESS AN INTEREST IN OUR COURSE

If you call our office for information on our course, we will not routinely hold any data about you unless you request further information to be sent. This will be limited to your name and email or home address to allow us to send the information requested. For home addresses, the data will not be stored, for email addresses your details will be held in accordance with our email policy of 30 days after communication at which point it will be securely destroyed. If you wish to have your email address removed sooner, then please let us know and we will ensure that this is removed without delay.

JOB APPLICANTS AND OUR CURRENT AND FORMER EMPLOYEES

What will we do with the information we hold?

We use the data we hold to enable us to provide you with access to our systems, schools and to contact you.

What information do we hold and why?

Employees of Essex and Thames Primary SCITT are employed by Runwell Community Primary School. Details of their privacy policy can be found [here](#). Should you require any further information, then please contact Joanne Madders, School Business Manager on 01268 735329. Essex and Thames Primary SCITT holds basic information both in physical and electronic form, this is limited to:

- Your name, address and contact details
This is to enable us to contact you and to provide you with access to our systems
- Your date of birth - this is part of our identity checking and is kept on our single central record.
- Results of your DBS check
This is so that we are able to provide your details to our partnership schools as you may be required to visit schools during the course of your employment.

Sharing of your data

We will need to share your data with the following:

- Partnership schools - this is to confirm your identity and safeguard children in our partnership schools
- DfE and other government bodies - this is in the event of an inspection and we would be legally bound to provide this information.
- Our auditors.

Retention Period

We will destroy your records on cessation of your employment contract. Runwell Community Primary School will hold your files in accordance with employment law.

SUPPLIERS AND SELF EMPLOYED INDIVIDUALS

What will we do with the information we hold?

We use the data we hold to fulfill the contract for services between us, or to fulfill our legal requirements; your data will never be used for any other purpose. Records are held in both paper and electronic format.

What information do we hold and why?

To enable us to use your services and fulfill our contract, we will need to collect and store information, the information collected and held will be:

- A copy of your signed service agreement (contract) - this is to ensure that both parties understand the conditions of the contract and to assist in the event of any dispute
- A copy of your CV - this is required to ensure that you hold the relevant experience in order to provide the service you are offering to Essex and Thames Primary SCITT
- Details of your qualifications - these are required to ensure that you hold the relevant qualifications in order to provide the service you are offering to Essex and Thames Primary SCITT
- Details of your DBS checks - this is to ensure the safeguarding of children in our Partnership Schools
- Details of any disputes and disciplinary actions or communications that may form part of your file - this is to ensure the safeguarding of children in our Partnership Schools and to enable us to fulfil or defend any legal action that may arise as a result
- Details of any satisfaction surveys/feedback that we receive - this is for continued development of our course
- Details of any courses that you may attend during the course of your contract with Essex and Thames Primary SCITT
- Your bank details - this is to enable us to make payments to you
- Your basic contact details: name, address, email address, telephone numbers and emergency contact details - this is to allow us to contact you, for the fulfillment of your contact and in the event of an emergency.
- Your date of birth - this is part of our identity checking and is kept on our single central record.

Sharing of your data

We will publish your name and agreed contact method within our handbook, this is provided to trainees, Partnership Schools and Essex and Thames employees (both employed and self employed). We may also share additional data, including your qualifications and copies of your CV to our University Partner and government agencies, such as Ofsted. The data we share will be limited to what is necessary and will never be used for marketing or any other purpose.

Retention Period

We are required to keep data on our former contractors for a period of 7 years after the end of the final contract, after this time your data will be securely destroyed.

PERSONNEL OF PARTNERSHIP SCHOOLS

What information do we hold and why?

To enable us to deliver the course, we need to contact members of Partnership School staff to provide and collect trainee information and gradings and to provide the administration of the course. This data is strictly limited to what is necessary:

- Name
- Position within the school
- Email address
- Contact telephone number

What will we do with the information we hold?

We will only use your employee's data to run our course. Details will never be used for any other purpose.

Sharing of your data

We will only share your data in the event of a request by a government department, such as Ofsted. Your consent will always be requested in these cases.

OUR LEGAL BASIS FOR PROCESSING

Essex and Thames Primary SCITT collects and uses collected personal data because it is necessary for:

- Complying with our legal obligations
- The pursuit of our legitimate interests (as set out below)
- The purposes of complying with our duties and exercising our rights under a contract for the delivery of our training programme.

The usual legal basis for processing data, is that it is necessary for complying with our legal obligations to the DfE and other government agencies or that it is necessary to enable us to fulfill our contract with you to provide your teacher training.

In general, we only rely on consent as a legal basis for processing in relation to sending direct marketing communications to applicants via email.

Our Legitimate Interests

Where the basis for processing is not our legal obligation or after you have provided consent, we may process your data for our legitimate interests:

- Protecting trainees, employees and other individuals and maintaining their safety, health and welfare
- Improving our existing course and developing new services
- Complying with our legal and regulatory obligations
- Preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies
- Handling trainee & applicant contacts, queries, complaints or disputes
- Managing insurance claims by any party
- Protecting Essex and Thames Primary SCITT, its employees and customers, by taking appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to Essex and Thames Primary SCITT
- Effectively handling any legal claims or regulatory enforcement actions taken against Essex and Thames Primary SCITT, and
- Fulfilling our duties to our trainees, applicants, colleagues, shareholders and other stakeholders
- To allow us to provide feedback to unsuccessful applicants to our course or applicants to vacancies
- To allow us to provide any additional support that may be required to assist you in successfully completing your training.

YOUR RIGHTS

The GDPR provides the following rights for individuals:

- **The right to be informed**

This privacy notice provides information on the data we collect, hold and store, the purpose for holding and processing, the lawful basis for processing and holding your data, the retention periods for your data in all circumstances, the categories of data that we hold, who we may share your data with and why, contact details for our organisation, your rights, how to make a complaint and the sources of your data.

- **The right of access**

You have the right to request access to all of the data that we hold about you at any time. This information is free of charge. To request a copy of your information, please email dataprotection@thamesprimaryscitt.co.uk or call our office on 01268 570215. This information will be provided within one month of proof of your identity being received.

- **The right to rectification**

If at any time you notice that your data is incorrect then please let us know and if your data is found to be inaccurate, we will rectify your data without delay. If there is a dispute over the accuracy of your data, we will inform you with our reasoning within one month and you will have the right to make a complaint to the ICO or another supervisory authority. You will also have the ability to seek to enforce this right through a judicial remedy.

- **The right to erasure (the right to be forgotten)**

The right to erasure is not absolute and does not apply in all circumstances. If you make a request to be forgotten, we will respond to your request within one month. You have the right to be forgotten if the following circumstances apply:

- The personal data is no longer necessary for the purpose which it was originally collected or processed for
- Consent was the lawful basis for holding the data, and you withdraw your consent
- Our legitimate interests was the basis for processing and you object to the processing of your data, and there is no overriding legitimate interest to continue this processing
- We are processing the personal data for direct marketing purposes and you object to that processing
- We have processed the personal data unlawfully (ie in breach of the lawfulness requirement of the 1st principle)
- We have to do it to comply with a legal obligation, or
- We have processed the personal data to offer information society services to a child.

If your request is upheld, we will contact anyone that we have shared your data with and obtain assurances that your data has been deleted.

- **When does the right to erasure not apply?**

The right to erasure does not apply if processing is necessary for one of the following reasons:

- To exercise the right of freedom of expression and information
- To comply with a legal obligation
- For the performance of a task carried out in the public interest or in the exercise of official authority
- For archiving purposes in the public interest, scientific research historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing, or
- For the establishment, exercise or defence of legal claims.

The GDPR also specifies two circumstances where the right to erasure will not apply to special category data:

1. If the processing is necessary for public health purposes in the public interest (eg protecting against serious cross-border threats to health, or ensuring high standards of quality and safety of health care and of medicinal products or medical devices); or
2. If the processing is necessary for the purposes of preventative or occupational medicine (eg where the processing is necessary for the working capacity of an employee; for medical diagnosis; for the provision of health or social care; or for the management of health or social care systems or services). This only applies where the data is being processed by or under the responsibility of a professional subject to a legal obligation of professional secrecy (eg a health professional).

If we are refusing your request we will inform you without undue delay and within one month of receipt of your request, providing you have given proof of your identification. We will inform you of the reason that we are not taking action and you will have the right to make a complaint to the ICO or another supervisory authority and have the ability to seek to enforce this right through a judicial remedy. We will not usually charge a fee, however, we reserve the right to charge a reasonable fee if your requests are unreasonable or excessive in nature.

- **The right to restrict processing**

The GDPR gives individuals the right to restrict the processing of their personal data in certain circumstances. This means that you are able to limit the way that Essex and Thames Primary SCITT can use your data; this is an alternative to requesting erasure of your data.

You have the right to restrict processing of your personal data where you have a particular reason for wanting the restriction. For example, this may be because you have issues with the consent of the information we hold or how we have processed your data. The right to restrict processing applies when:

1. You contest the accuracy of your personal data held and you are verifying the accuracy of the data
2. Your data has been unlawfully processed and you oppose erasure and request restriction instead
3. Essex and Thames Primary SCITT no longer needs the data, but you need us to keep the data in order to establish, exercise or defend a legal claim, or
4. You have objected to Essex and Thames Primary SCITT processing your data and we are considering whether our legitimate grounds override yours as an individual.

In addition, you can also ask us to restrict processing whilst you await our response to your request to your right of rectification and objection. It is standard practice that we will automatically restrict processing in these circumstances. Once a decision is made, we will inform you that we will be lifting the restriction on processing of your data, along with the outcome of your request.

If we uphold your request to restrict processing, we will contact anyone that we have shared your data with and obtain assurances that no further processing will take place.

When does the right to restriction not apply?

We may refuse your request to restrict processing if any of the following exceptions apply:

1. We have your consent for further processing
2. The processing is for the establishment, exercise or defence of legal claims
3. It is for the protection of the rights of another person (natural or legal), or
4. It is for reasons of important public interest.

If we are refusing your request we will inform you without undue delay and within one month of receipt of your request, providing you have given proof of your identification. We will inform you of the reason that we are not taking action and you will have the right to make a complaint to the ICO or another supervisory authority and have the ability to seek to enforce this right through a judicial remedy. We will not usually charge a fee. However, we reserve the right to charge a reasonable fee if your requests are unreasonable or excessive in nature.

- **The right to data portability**

The right to data portability provides that you are able to request any data that you have provided to Essex and Thames Primary SCITT to be provided in a structured, commonly used and machine readable format. We will usually use a format such as CSV files. It also provides that you can request that we transmit this data directly to another controller. This right only applies to data which you have supplied to Essex and Thames Primary SCITT, either directly or by way of consequence of our contract, contact, training or agreement.

The right to data portability applies when:

1. Our lawful basis for processing this information is consent or for the performance of a contract, and
2. We are carrying out the processing by automated (computerised) means, this excludes paper files.

If your personal data would identify another natural or legal person, we may decide to withhold part of the information supplied, unless we are able to obtain consent from the third party. You will be informed if this is the case.

We will respond to your request without undue delay and within one month of your request. If we have decided not to provide the data as we deem the request to be excessive or repetitive in nature, you will have the right to make a complaint to the ICO or another supervisory authority and have the ability to seek to enforce this right through a judicial remedy. We will not usually charge a fee, however, we reserve the right to charge a reasonable fee if your requests are unreasonable or excessive in nature.

- **The right to object**

The GDPR provides the right for individuals to object to processing in certain circumstances:

1. The processing is based on legitimate interest or the performance of a task in the public interest/exercise of official authority, including profiling
2. The processing is for the purposes of direct marketing, including profiling, and
3. The processing is for the purposes of scientific/historical research and statistics.

The GDPR states that we must stop processing if you object, unless:

1. We are able to demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the individual, or
2. If the processing is for the establishment, exercise or defence of legal claims

We will respond to your request without undue delay. If we have decided not to uphold your objection to the processing of your data, you will have the right to make a complaint to the ICO or another supervisory authority and have the ability to seek to enforce this right through a judicial remedy.

- **Rights in relation to automated decision making and profiling.**

Essex and Thames Primary SCITT do not use automated decision making or profiling. All data is handled by our staff and all decisions are made with human involvement. We have decided, however, to provide the information to you.

What is automated decision making and profiling?

Automated decision making is making a decision solely by automated means without any human involvement. Profiling is the automated processing of personal data to evaluate certain things about and individual, and can be part of an automated decision making process. The GDPR applies to both and has additional rules to protect individuals from

organisations using solely automated decision making that has legal or significant effects on them. This type of processing can only be used where the decision is:

1. Necessary for the entry into or performance of a contract, or
2. Authorised by Union or Member State law applicable to the controller, or
3. Based on the individual's explicit consent.

If processing falls under automated decision making and/or profiling, you must be provided with information about the processing, given simple ways to request human intervention or challenge decisions and the controller must carry out regular check to ensure that systems are working as intended.

CONTACTS

Data Protection Officer

Sue Rooney

Tel: 01268 570215

Email: dataprotection@thamesprimaryscitt.co.uk

ICO

For independent advice about data protection, privacy and data sharing issues, you can contact the Information Commissioner's Office (ICO) at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Tel: 0303 123 1113 (local rate) **or** 01625 545 745 if you prefer to use a national rate number

Alternatively, visit ico.org.uk or **email** casework@ico.org.uk.