

Essex & Thames Education Trading as Essex & Thames SCITT

Privacy Notice Last Updated: September 2025

Next Review: August 2026

Version Number	V1.5
Approved on	To be Approved
Previous Version Number	V1.4
Approved on	29th November 2023
Signature of Chair of Trustees	<i>Julie Winyard</i>

Change Record

New Version No	Date of Change:	Changed By:	Comments:
V1.5	03/09/2025	Complete Rewrite	Updated entire policy to reflect new processes within ETE
V1.6	08/09/2025	Minor Update	Throughout, safeguarding documentation undertaken listed rather than grouped under a single heading.
V1.7	05/12/2025	Minor Update	National insurance number added to Section 2, page 11 under apprenticeships.

ABOUT US

Essex and Thames Education, trading as Essex & Thames SCITT, works with more than 100 primary schools to provide teacher training. We are registered with the Companies House, our registration number is 13442286. We are also a registered Charity under charity number 1196330.

We work with lead schools to provide teacher training in Essex and East London, our training partner schools for 2025/2026 are:

Milton Hall Primary School
Beaulieu Park School

When applying to one of our training partner school course codes, you are still applying to Essex & Thames Education as the training provider and may be placed in any of our partnership schools during your training year.

Training partner schools are different to partnership schools in that they have course codes attached to them. Partner schools are still included in our list of partnership schools and, depending on capacity, can be used for placements during your training year.

To apply to our course, you must apply via '[DfE Apply for Teacher Training](#)' using one of our course codes, a list of codes for the 2025/2026 academic year can be found [here](#).

Data Controller

For the purpose of data protection, Essex & Thames Education is the Data Controller. This means that we collect data and decide on how this is to be used in order to provide our courses.

Access to the Apply for Teacher Training system is provided by the Department of Education. You can find out more about our data sharing agreement with the DfE here: [pdf DfE Apply DPA.pdf](#)

Once you have been accepted onto the course and all of your outstanding requirements have been met, you will be entered into the Register Trainee Teachers System, this will start your teaching career and issue you with a Teacher's Reference Number (TRN). You can find out more about our data sharing agreement with the DfE here:

[pdf Register trainee teachers data sharing agreement - Register trainee teachers - GOV.UK.pdf](#)

How Your Data is Collected

We collect data in several ways:

- Applications via the DfE Apply for Teacher Training system
- Direct Applications via our website
- Details from emails and/or phone calls where we ask permission to store you data in order to progress your application
- Details received from our 'Contact us' page on our website

Your Data

Essex and Thames Education and all of our schools understand and respect the importance of keeping personal data secure and fully comply with the Data Protection Act 2018 (DPA 2018), and the UK General Data Protection Regulation (UK GDPR). Data is held securely by way of secure systems, including physical and electronic security, access control, passwords and regular audits and checks.

Essex & Thames Education ("we", "our" and "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 & Thames Education 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 SCITT obtains, stores and uses your personal information.

CONTENTS

Please click on the hyperlinks below to view details of the information that you would like to see.

SECTION 1

APPLICANTS TO OUR COURSE

- [Application Review Stage](#)
 - [Unsuccessful Applicants at the Application Review Stage](#)
 - [Successful Applicants at the Application Review Stage](#)
 - Those that decline an interview
 - Those that accept an interview
- [Applicants that Attend an Interview](#)
 - Those that are unsuccessful at interview
 - Those that are successful at interview and offered a place
- [Applicants that are Offered a Place](#)
 - Those that accept a place
 - Those that accept a place and later withdraw or defer before starting the course

SECTION 2

- [Trainees and Apprentices on our Courses](#)
- [Those that withdraw or defer after starting the course](#)

SECTION 3

ASSESSMENT ONLY - APPLICANTS & PARTICIPANTS

- [Application Review Stage \(AO\)](#)
- [Unsuccessful Applicants at the Application Review Stage \(AO\)](#)
- [Successful Applicants at the Application Review Stage \(AO\)](#)
- [Those that decline an Interview \(AO\)](#)
- [Those that accept an Interview \(AO\)](#)
- [Those that are unsuccessful at interview \(AO\)](#)
- [Those that are successful at interview and accepted onto the route \(AO\)](#)

SECTION 4

Former Trainees

SECTION 5

Marketing Data

- [Visitors to our website](#)
- [People who register an interest at one of our recruitment events](#)
- [People who contact us to express an interest in our courses](#)

SECTION 6

Employed Staff and Self Employed Staff

- [Employed Staff](#)
 - [Applicants for vacancies](#)
 - [Employees](#)
 - [Current Employees](#)
 - [Former Employees](#)
- [Self employed persons](#)
 - [Applicants for vacancies](#)
 - [Current self employed persons](#)
 - [Former self employed persons](#)

SECTION 7

Trustees & Committee Members

SECTION 8

Partnership School Staff

SECTION 9

Other Stakeholders

- [Suppliers and Professional Service Providers](#)
- Referees for our applicants/trainees/former trainees/staff
- Outside Agency Staff

OUR LEGAL BASIS FOR PROCESSING

YOUR RIGHTS

Transfers to Third Countries or International Organisations

Systems and Third Parties

Data retention schedule

How to Complain and Contacts

SECTION 1

APPLICANTS TO OUR COURSE

Essex & Thames Education is the joint data controller with the Department for Education (DfE) 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 sue@ete.org.uk

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

1. Applications via 'Apply for Teacher Training'
2. Direct applications via our website

Applicants that apply via the direct route will still need to apply via the 'Apply for Teacher Training' website to progress their application. The purpose of the direct form is to allow early applications from candidates or for the purpose of an application review before formally applying.

What Information will we hold?

The information we collect at the application stage is as follows:

- Name
- Address
- Date of birth
- Phone Number
- Email Address
- Any other personal/special category data that the applicant chooses to include in their application form, such as disabilities
- Nationality
- Work history and unpaid experience
- Qualifications
- Safeguarding documentation, including:
 - Your self declaration form (SD2 form)
 - Details of the online presence check undertaken and the recommendations following this
 - Details of your DBS check
 - The results of any overseas police checks, if required
 - Details of any professional misconduct

This information is entered onto our applications spreadsheet, held in the Google Workspace for Education account.

What will we do with your information?

The information we receive is to allow us to process your application for possible entry onto our courses. Processing teacher training applications means:

- Getting in touch with applicants about their application
- Getting in touch with referees/applicants/relevant DfE staff if there has been a data security issue
- Making decisions on applications
- Getting statistics for internal use
- Contacting relevant staff at the DfE is necessary to process an application

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 fulfill 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.

How long will we retain your data?

Please see our retention schedule [here](#).

Application Review Stage

The following processes take place once an application has been received:

- Your details are added to our applications spreadsheet
- A copy of your application is uploaded to our Google Workspace for Education system
- A member of our Senior Leadership team (SLT) will be alerted that an application has been uploaded and will access the application via the workspace account
- The reviewing member of SLT will advise the Administration team of the outcome

Who will we share your data with?

There will be no external sharing of your data at this stage.

Unsuccessful Applicants at the Application Review Stage

Should your application be unsuccessful at this stage, your application will be kept on file until the end of the recruitment cycle to enable us to provide any feedback that you may wish to receive as an applicant along with any details we have entered onto our computerised system, at which point your application will be deleted and your data anonymised on our spreadsheet. Our Senior Leadership, Finance and administration teams will have access to all of this information. All of our staff are trained in data protection and receive annual training on GDPR compliance. No further processing of your data will take place until the time of deletion.

Who will we share your data with?

There will be no external sharing of your data.

How long will we retain your data?

Please see our retention schedule [here](#).

Successful Applicants at the Application Review Stage

Those that Decline an Interview

Should your application be successful at the initial stage, you will be offered an interview at the next available date. You will receive an email from a member of our administration team with the date offered and any alternatives. Should you decline an interview, your application will be kept on file until the end of the recruitment cycle, at which point your application will be deleted and your data anonymised on our spreadsheet. Our Senior Leadership, Finance and administration teams will have access to all of this information. All of our staff are trained in data protection and receive annual training on GDPR compliance. No further processing of your data will take place until the time of deletion.

Who will we share your data with?

There will be no external sharing of your data.

Those that accept an Interview

All of our interviews are held remotely via Zoom with two members of our team in attendance. The interviews are not recorded or stored. Notes are taken during the interview and will form part of the file created.

Before the interview, we are required by KSIE guidance to confirm the identity and proof of address of applicants and evidence of required qualifications. At this point you will be asked to provide three items of ID to prove your identity, a list of the acceptable documents can be found here:

 Enhanced DBS - Document Information.pdf

This will also check your right to work in the UK.

You will also be required to provide evidence of the following qualifications:

- GCSE certificates for Mathematics, English and Science, or equivalents**
- Degree Certificate**

** where the qualifications are held are overseas qualifications, you will also be required to provide an ENIC statement of comparability.

Further information is gathered at this stage:

- Where gaps in your employment and education history have been identified, you will be asked to complete a 'gaps in employment history' document, detailing the gaps.
- You will be asked to complete a self declaration form (SD2 form) that details any criminal offences or pending criminal offences

An individual folder will be created in our Google for Education Workspace that contains your application, ID, Qualifications, Interview notes, safeguarding documents and any other correspondence collected during the initial stages.

Who will we share your data with?

There will be no external sharing of your data.

How long will we retain your data?

Please see our retention schedule [here](#).

Applicants that Attend an Interview

Those that are Unsuccessful at Interview Stage

If you are unsuccessful at the interview stage, we will keep your application and interview notes on file until the end of the recruitment cycle in order that we can provide any feedback that you may wish to have. Copies of your ID, employment breaks, SD2 form and qualifications will be removed immediately.

Your details will remain on the applications spreadsheet, this will be anonymised at the end of the recruitment cycle.

Who will we share your data with?

There will be no external sharing of your data.

How long will we retain your data?

Please see our retention schedule [here](#).

Applicants that are Offered a Place

Those that are Successful at Interview and Offered a Place

If you are successful at the interview stage an offer will be made via email and on the 'Apply for Teacher Training' system.

Those that Decline an Offer of a Place

If you decline our offer, either via email or the 'Apply for Teacher Training' system, we will keep your application and interview notes on file until the end of the recruitment cycle in order that we can provide any feedback that you may wish to have. Copies of your ID, employment breaks, SD2 form and qualifications will be removed immediately.

Your details will remain on the applications spreadsheet, this will be anonymised at the end of the recruitment cycle.

Who will we share your data with?

There will be no external sharing of your data.

How long will we retain your data?

Please see our retention schedule [here](#).

Those that Accept an Offer of a Place

If you accept our offer of a place on our course further information will be provided by the 'Apply for Teacher Training' system and we also request some further information from you. We will hold the following information at this stage:

- Name
- Address
- Date of birth
- Phone Number
- Email Address
- Any other personal/special category data that the applicant chooses to include in their application form, such as disabilities
- Nationality
- Work history and unpaid experience
- Qualifications
- Safeguarding documentation, including:
 - Your self declaration form (SD2 form)
 - Details of the online presence check undertaken and the recommendations following this
 - Details of your DBS check
 - The results of any overseas police checks, if required
 - Details of any professional misconduct
- Copies of your ID provided
- Copies of your qualifications provided
- Your gaps in employment declaration (if this is applicable)
- Notes from your interview and any relevant correspondence collected during the recruitment and interview process
- We will ask you to undertake a pre-course health screening check, this is to enable us to make any reasonable adjustments to our training and is a recommendation from KSIE. Our partner for the Health checks is OPA Health, further details can be found on the 'Systems and Third Parties' Section, accessible here. The details of the check will be recorded in our Google for Education Workspace and reviewed by a member of our SLT with responsibility for Wellbeing. If any additional support is required, you may be referred to Occupational Health to enable us to provide any reasonable adjustments that may be required
- Results of pre-course tasks
- References
- We will ask you for emergency contact details in case we need to contact someone due to an injury or illness while you are in base or at your school placement
- 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
- If you are a salaried trainee or an apprentice, we will need to hold a copy of your contract with your employing school and a copy of a payslip to confirm compliance with the salaried routes into teaching
- For the apprenticeship route, we will need to collect some additional data, this is required by the Apprenticeships Service, the data we will collect and hold on file will be:
 - Checks on your ILR (Individual Learner Record) - this is to ensure that any prior learning you have will not reduce the apprenticeship to below the minimum duration requires
 - Minutes of the meetings held between us as a provider, you as the apprentice and your employing school

We will also be provided with some additional information from the DfE. This data is classified as special category data:

- Sex (female, male, other or not provided)
- Nationalities
- Ethnicity
- Disabilities

This data is used by the DfE for the following purposes:

- For the collection of data for statistics and publications
- For assessing the impact of teacher recruitment campaigns
- For the calculation and allocation of funding for bursaries, scholarships and grants
- For the auditing of third party teacher training providers
- For the awarding of QTS at the end of a trainee's teacher training
- For creating a trainee teacher's record once they qualify, which is used throughout their teaching career

Who will we share your data with?

We will need to share your details with some of our partners to enable us to provide our courses to you. We will be sharing data with:

- Our university partner, if you are on one of the PGCE + QTS courses
- We will update your registration and attendance on the course with Student Finance England if you have applied for Student Finance for your fees
- We will enter your name and address details into our accounting system in order to raise invoices if you are self funding
- Some of our team are self employed, this is limited to some members of the lecture and personal tutor teams. The data provided to these individuals will be limited to your name, employing school (if you are an apprentice or salaried trainee), your performance details and any health or disability details that are provided by you in order to facilitate your training
- If you are in receipt of a bursary from your school that is paid via Essex & Thames, we will also share your bank details with our bank in order to make payments
- We will share your basic personal details and training details with the Mosaic platform, provided by Penrose Education. This is so that they are able to provide their services and provide support to us with use of the platform.
- We will use the details provided by you to run DBS checks. These are provided by E2E Vetting, via Essex County Council
- We will register you with NASBTT (National Association of School-Based Teacher Trainers). This is to provide you with a membership for your training year and access to training resources
- We will share your basic, safeguarding and training details with your placement schools for your training year, this is to enable your training.
- If we are subject to inspections during the course of your training, we will also need to share your details with the relevant body: Ofsted, ESFA, HSE or OIA
- Your record may also be selected during our annual audit process. In this case, your file will be reviewed by the Charity's auditors, MWS Accountants
- If there are any disciplinary actions, we may also need to share your information with an independent investigator

Where you have complaints about data that has been shared with external organisations, please email our DPO, sue@ete.org.uk who is the single point of contact for any data complaints.

How long will we retain your data?

Please see our retention schedule [here](#).

Your data if you withdraw or defer and do not start the course

If you decide to withdraw from the course after accepting a place but did not start, we will keep your record in line with our data retention schedule which can be accessed [here](#). However, if you decide to defer your place, we will hold your records ready for the start of the next academic year.

SECTION 2

TRAINEES AND APPRENTICES ON OUR COURSE

Essex & Thames Education is the joint data controller with the Department for Education (DfE). Once you have been fully registered, your record will be transferred from the DfE 'Manager Teacher Training Applications' system to the 'Register Trainee Teachers' system. This transfer occurs once a member of our team confirms that all conditions of your offer have been met.

What will we do with the information we hold?

The information we hold is to allow us to provide our service to deliver our courses to you. We will use your data to:

- Create your trainee record in our Google Workspace for Education
- Create your trainee record in our Mosaic platform
- Deliver our courses to you
- Track and monitor your progress
- Coordinate our courses with your placement school staff
- Provide references at the end 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 (computerised) or physical (paper) format.

What information do we hold?

Once you start a course, we will need to hold information to allow us to provide our courses to you. Some of the details were provided by the DfE 'Apply for Teacher Training' system and additional information will have been collected by Essex & Thames Education as part of the recruitment process. The information we will hold will be:

- Name
- Address
- Date of birth
- Phone Number
- Email Address
- Any other personal/special category data that the applicant chooses to include in their application form, such as disabilities
- Nationality
- Work history and unpaid experience
- Qualifications
- Safeguarding documentation, including:
 - Your self declaration form (SD2 form)
 - Details of the online presence check undertaken and the recommendations following this
 - Details of your DBS check
 - The results of any overseas police checks, if required
 - Details of any professional misconduct
- Copies of your ID provided
- Copies of your qualifications provided
- Your gaps in employment declaration (if this is applicable)
- Notes from your interview and any relevant correspondence collected during the recruitment and interview process
- We will ask you to undertake a pre-course health screening check, this is to enable us to make any reasonable adjustments to our training and is a recommendation from KSIE. Our partner for the Health checks is OPA Health, further details can be found on the 'Systems and Third Parties' Section, accessible [here](#). The details of the check will be recorded in our Google for Education Workspace and reviewed by a member of our SLT with responsibility for Wellbeing. If any additional support is required, you may be referred to Occupational Health to enable us to provide any reasonable adjustments that may be required
- Results of pre-course tasks
- References
- We will ask you for emergency contact details in case we need to contact someone due to an injury or illness while you are in base or at your school placement
- 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

- If you are a salaried trainee or an apprentice, we will need to hold a copy of your contract with your employing school and a copy of a payslip to confirm compliance with the salaried routes into teaching
- For the apprenticeship route, we will need to collect some additional data, this is required by the Apprenticeships Service, the data we will collect and hold on file will be:
 - Checks on your ILR (Individual Learner Record) - this is to ensure that any prior learning you have will not reduce the apprenticeship to below the minimum duration requires
 - Minutes of the meetings held between us as a provider, you as the apprentice and your employing school
 - Your National Insurance Number
- Your training records, which will include results of observations, progress trackers, awards of QTS and PGCE and any disciplinary records
- Details of any support plans put in place
- We will keep any relevant email or correspondence records that are deemed to be part of your file for 7 years
- Any email which is not considered part of your file but contains useful information will be kept until the end of the academic year
- Your attendance and absence records
- Copies of medical certificates received in support of absences
- Details of any payments received from or made to you
- Details of your Student Finance fees record

We will also have been provided with some additional information from the DfE. This data is classified as special category data:

- Sex (female, male, other or not provided)
- Nationalities
- Ethnicity
- Disabilities

This data is used by the DfE for the following purposes:

- For the collection of data for statistics and publications
- For assessing the impact of teacher recruitment campaigns
- For the calculation and allocation of funding for bursaries, scholarships and grants
- For the auditing of third party teacher training providers
- For the awarding of QTS at the end of a trainee's teacher training
- For creating a trainee teacher's record once they qualify, which is used throughout their teaching career

Who will we share your data with?

We will need to share your details with some of our partners to enable us to provide our courses to you. We will be sharing data with:

- Our university partner, if you are on one of the PGCE + QTS courses
- We will update your registration and attendance on the course with Student Finance England if you have applied for Student Finance for your fees
- We will enter your name and address details into our accounting system in order to raise invoices if you are self funding
- Some of our team are self employed, this is limited to some members of the lecture and personal tutor teams. The data provided to these individuals will be limited to your name, employing school (if you are an apprentice or salaried trainee), your performance details and any health or disability details that are provided by you in order to facilitate your training
- If you are in receipt of a bursary from your school that is paid via Essex & Thames, we will also share your bank details with our bank in order to make payments
- We will share your basic personal details and training details with the Mosaic platform, provided by Penrose Education. This is so that they are able to provide their services and provide support to us with use of the platform.
- We will use the details provided by you to run DBS checks. These are provided by E2E Vetting, via Essex County Council

- We will register you with NASBTT (National Association of School-Based Teacher Trainers). This is to provide you with a membership for your training year and access to training resources
- We will share your basic, safeguarding and training details with your placement schools for your training year, this is to enable your training.
- If we are subject to inspections during the course of your training, we will also need to share your details with the relevant body: Ofsted, ESFA, HSE or OIA
- Your record may also be selected during our annual audit process. In this case, your file will be reviewed by the Charity's auditors, MWS Accountants
- If there are any disciplinary actions, we may also need to share your information with an independent investigator

Where you have complaints about data that has been shared with external organisations, please email our DPO, sue@ete.org.uk who is the single point of contact for any data complaints.

How long will we retain your data?

Please see our retention schedule [here](#).

Your data if you withdraw or defer and do not start the course

If you decide to withdraw from the course after accepting a place but did not start, we will keep your record in line with our data retention schedule which can be accessed [here](#). However, if you decide to defer your place, we will hold your records ready for the start of the next academic year.

SECTION 3

ASSESSMENT ONLY - APPLICANTS & PARTICIPANTS

Applicants to the Assessment Only Route into Teaching

Applications to the Assessment Only route are made via our website, using a plug-in form. The application is emailed directly to our Administration team who will review your application before passing it over to a member of our Senior Leadership Team for consideration.

The information we collect at the application stage is as follows:

- Name (including any previous names)
- Address
- Date of birth
- Phone Number
- Email Address
- Nationality
- Settlement Status
- Any other personal/special category data that the applicant chooses to include in their application form, such as disabilities
- Work history and unpaid experience
- Qualifications
- Safeguarding documentation, including:
 - Your self declaration form (SD2 form)
 - Details of the online presence check undertaken and the recommendations following this
 - Details of your DBS check
 - The results of any overseas police checks, if required
 - Details of any professional misconduct

This information is entered onto our Assessment Only applications spreadsheet, held in the Google Workspace for Education account.

What will we do with the information we receive?

The information we receive is to allow us to process your application for possible entry onto the Assessment Only Route into Teaching. Processing applications means:

- Getting in touch with applicants about their application
- Getting in touch with referees/applicants/relevant DfE staff if there has been a data security issue
- Making decisions on applications
- Getting statistics for internal use
- Contacting relevant staff at the DfE is necessary to process an application

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 fulfill our stated purposes and will not retain it for longer than is necessary.

The information is used to assess your suitability to obtain QTS and to ensure you meet the criteria for the Assessment Only route. 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.

Application Review Stage (AO)

The following processes take place once an application has been received:

- Your details are added to our applications spreadsheet
- A copy of your application is uploaded to our Google Workspace for Education system
- A member of our Senior Leadership team (SLT) will be alerted that an application has been uploaded and will access the application via the workspace account
- The reviewing member of SLT will advise the Administration team of the outcome

Who will we share your data with?

There will be no external sharing of your data.

How long will we retain your data?

Please see our retention schedule [here](#).

Unsuccessful Applicants at the Application Review Stage (AO)

Should your application be unsuccessful at this stage, your application will be kept on file until the end of the recruitment cycle to enable us to provide any feedback that you may wish to receive as an applicant along with any details we have entered onto our computerised system, at which point your application will be deleted and your data anonymised on our spreadsheet. Our Senior Leadership, Finance and administration teams will have access to all of this information. All of our staff are trained in data protection and receive annual training on GDPR compliance. No further processing of your data will take place until the time of deletion.

Who will we share your data with?

There will be no external sharing of your data.

How long will we retain your data?

Please see our retention schedule [here](#).

Successful Applicants at the Application Review Stage (AO)

Compliance Checking Stage (AO)

Before an offer of an interview can be made, further checks are required to ensure candidates meet the entry criteria for the Assessment Only Route into Teaching. At this stage we will collect the following further information:

- We will ask you to complete an SD2 (Declaration of unspent criminal offences)
- If required, we will ask you to complete a breaks in employment form
- If required, we will ask you to provide a certificate of good conduct
- We will ask you for your DBS details
- We will ask you to send us copies of your qualifications
- We will ask you to send us copies of your ID
- We will ask your current employing school and your previous employing school(s) to complete a reference that confirms that you meet the requirements of the route

Once the required evidence is collected, we will then offer you an interview if you meet all of the requirements.

Those that Decline an Interview

Should you decline an interview and decide not to proceed, your application will be kept on file until the end of the recruitment cycle, at which point your application will be deleted and your data anonymised on our spreadsheet. Our Senior Leadership, Finance and administration teams will have access to all of this information. All of our staff are trained in data protection and receive annual training on GDPR compliance. No further processing of your data will take place until the time of deletion.

Who will we share your data with?

There will be no external sharing of your data.

How long will we retain your data?

Please see our retention schedule [here](#).

Those that accept an Interview

Interviews for the AO route are held in person and include an assessment of your teaching against the Teachers's Standards. Notes and performance data are taken during the interview and will form part of the file created.

During the interview, you will be asked to show copies of your ID and qualifications that have been sent to the administration team as well as your DBS certificate. We must see original documents.

An individual folder will be created in our Google for Education Workspace that contains your application, ID, Qualifications, Interview notes, safeguarding documents and any other correspondence collected during the initial stages.

Who will we share your data with?

There will be no external sharing of your data.

How long will we retain your data?

Please see our retention schedule [here](#).

Those that are Unsuccessful at Interview Stage

If you are unsuccessful at the interview stage, we will keep your application and interview notes on file until the end of the recruitment cycle in order that we can provide any feedback that you may wish to have. Copies of your ID, employment breaks, SD2 form and qualifications will be removed immediately.

Your details will remain on the applications spreadsheet, this will be anonymised at the end of the recruitment cycle.

Who will we share your data with?

There will be no external sharing of your data.

How long will we retain your data?

Please see our retention schedule [here](#).

Those that are Successful at Interview and Accepted onto the AO Route

If you are successful at the interview stage an offer will be made via email and on the 'Apply for Teacher Training' system.

Those that decide not to continue with the AO route after interview

If you decline our offer, either via email or the 'Apply for Teacher Training' system, we will keep your application and interview notes on file until the end of the recruitment cycle in order that we can provide any feedback that you may wish to have. Copies of your ID, employment breaks, SD2 form and qualifications will be removed immediately.

Your details will remain on the applications spreadsheet, this will be anonymised at the end of the recruitment cycle.

Who will we share your data with?

There will be no external sharing of your data.

How long will we retain your data?

Please see our retention schedule [here](#).

Those that proceed to the assessment period (AO)

If you proceed with the AO route we will hold the following information on file:

- Name
- Address

- Date of birth
- Phone Number
- Email Address
- Any other personal/special category data that the applicant chooses to include in their application form, such as disabilities
- Nationality
- Work history and unpaid experience
- Qualifications
- Safeguarding documentation, including:
 - Your self declaration form (SD2 form)
 - Details of the online presence check undertaken and the recommendations following this
 - Details of your DBS check
 - The results of any overseas police checks, if required
 - Details of any professional misconduct
- Copies of your ID provided
- Copies of your qualifications provided
- Your gaps in employment declaration (if this is applicable)
- Notes from your interview and any relevant correspondence collected during the compliance and interview process
- Code of conduct
- Results of pre-course tasks
- References

We will need to share your details with some of our partners to enable us to provide our courses to you. We will be sharing data with:

- We will register you with the DfE 'Register' system. This will generate your Teaching record and Teacher Reference Number 'TRN'
- We will enter your name and address details into our accounting system in order to raise invoices if you are self funding
- Some of our team are self employed, this is limited to some members of the personal tutor team. The data provided to these individuals will be limited to your name, employing school, your performance details and any health or disability details that are provided by you in order to facilitate your assessment
- If we are subject to inspections during your assessment period, we will also need to share your details with the relevant body: Ofsted, ESFA, HSE or OIA
- Your record may also be selected during our annual audit process. In this case, your file will be reviewed by the Charity's auditors, MWS Accountants
- If there are any disciplinary actions, we may also need to share your information with an independent investigator
- If you are successful, your record with DfE Register will be updated to recommend you for QTS

Where you have complaints about data that has been shared with external organisations, please email our DPO, sue@ete.org.uk who is the single point of contact for any data complaints.

How long will we keep your data? (AO)

Please see our retention schedule [here](#).

SECTION 4

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 fulfillment 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 requires 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 minimized to the least amount possible and will include:

- Your basic information: name, address, date of birth, contact details (on application form)
- UCAS/DfE Apply 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 Assessments
- 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
- Identity Documents
- Proof of your qualifications
- A copy of your Completed Barriers to Learning form.
- For salaried trainees or apprentices 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.

How long will we retain your data?

Please see our retention schedule [here](#).

SECTION 5 MARKETING DATA

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 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.

The website allows a message to be sent directly to our team via email. This is used to provide you with any information that you may require.

The website also has links to application forms to enable you to apply directly to our courses. The system sends a copy of your application via email directly to our team.

The data is not downloaded from the website, shared or stored in any format.

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 Google Workspace account 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 any time.

PEOPLE WHO CONTACT US TO EXPRESS AN INTEREST IN OUR COURSE

If you call our office or email 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.

SECTION 6

Employed Staff and Self Employed Staff

Essex & Thames Education takes the security of data of staff, self employed staff and those applying for vacancies seriously and ensures that only persons authorised to do so can access the data.

- Employed Staff
 - Applicants for vacancies

When you apply for a vacancy, your application will be received by a member of the Senior Leadership Team who will review your application. The details collected at the application stage are:

- Name
- Address
- Date of birth
- Phone Number
- Email Address
- Any other personal/special category data that the applicant chooses to include in their application form, such as disabilities
- Nationality
- Work history and unpaid experience
- Qualifications
- Safeguarding documentation, including:
 - Your self declaration form (SD2 form)
 - Details of the online presence check undertaken and the recommendations following this
 - Details of your DBS check
 - The results of any overseas police checks, if required
 - Details of any professional misconduct
- A copy of your CV

Who will we share your data with?

There will be no external sharing of your data.

How long will we retain your data?

Please see our retention schedule [here](#).

- Applicants that are invited to interview

If you are successful at the initial stage, you will be invited to interview. At this point we will ask for some additional information:

- We will ask for copies of your ID
- We will ask for copies of your qualifications
- We will ask you to complete a gaps in employment declaration (if applicable)
- We will ask you for a certificate of good conduct (if applicable)

If you decide not to proceed with the interview, or you are unsuccessful at the interview, we will keep your application until the end of the academic year, at which point it will be securely destroyed.

If you proceed with the interview, the following additional data will be added to your file:

- Interview notes
- Results of interview tasks

If you are offered a position and decide not to accept our offer, we will keep your application and interview paperwork until the end of the academic year, at which point it

will be securely destroyed.

Who will we share your data with?

There will be no external sharing of your data.

How long will we retain your data?

Please see our retention schedule [here](#).

o **Current Employees**

Once you have accepted an offer of employment, the following additional information will be collected and added to your file:

- Results of your DBS check
- Signed contract of employment
- Signed code of conduct
- Your bank details
- Your emergency contact details
- Your National Insurance Number
- Your Teacher Reference Number (if applicable)

During the course of your employment, additional data will be collected that will form part of your personnel file, this includes:

- Records of your Personnel Management Review (PMR)
- Records of any disciplinary actions
- Records of your performance
- Records of your annual leave
- Records of your absences, with details of the reasons, for example, health, maternity and compassionate
- Records of your pay details

Who will we share your data with?

We may need to share your data with outside organisations such as the Charity Auditors, legal professionals, Ofsted and the OIA.

We use Brightpay to process and submit our payroll records.

In order for you to fulfil the terms of your contract, we will also need to share your details with Trustees, partnership school staff, trainees, candidates, applicants to our courses, suppliers and service providers.

Where you have complaints about data that has been shared with external organisations, please email our DPO, sue@ete.org.uk who is the single point of contact for any data complaints.

How long will we retain your data?

Please see our retention schedule [here](#).

o **Former Employees**

The data held for former employees comprises the records held for the duration of the employment.

Who will we share your data with?

We may need to share your data with outside organisations such as the Charity Auditors, legal professionals, Ofsted and the OIA.

Where you have complaints about data that has been shared with external organisations, please email our DPO, sue@ete.org.uk who is the single point of contact for any data complaints.

How long will we retain your data?
Please see our retention schedule [here](#).

- **Self employed persons**
 - **Applicants for vacancies**

When you apply for a vacancy, your application will be received by a member of the Senior Leadership Team who will review your application. The details collected at the application stage are:

- Name
- Address
- Date of birth
- Phone Number
- Email Address
- Any other personal/special category data that the applicant chooses to include in their application form, such as disabilities
- Nationality
- Work history and unpaid experience
- Qualifications
- Safeguarding documentation, including:
 - Your self declaration form (SD2 form)
 - Details of the online presence check undertaken and the recommendations following this
 - Details of your DBS check
 - The results of any overseas police checks, if required
 - Details of any professional misconduct
- A copy of your CV

Who will we share your data with?

There will be no external sharing of your data.

How long will we retain your data?

Please see our retention schedule [here](#).

- Applicants that are invited to interview

If you are successful at the initial stage, you will be invited to interview. At this point we will ask for some additional information:

- We will ask for copies of your ID
- We will ask for copies of your qualifications
- We will ask you to complete a gaps in employment declaration (if applicable)
- We will ask you for a certificate of good conduct (if applicable)

If you proceed with the interview, the following additional data will be added to your file:

- Interview notes
- Results of interview tasks

Who will we share your data with?

There will be no external sharing of your data.

How long will we retain your data?

Please see our retention schedule [here](#).

- Those that are unsuccessful

If you are unsuccessful, we will remove copies of your ID and qualifications, details of your gaps in employment history and your certificate of good conduct, if this applies.

Who will we share your data with?

There will be no external sharing of your data.

How long will we retain your data?

Please see our retention schedule [here](#).

- **Current self employed persons**

Once you have accepted our offer of engagement, the following additional information will be collected and added to your file:

- Results of your DBS check
- Signed contract of services
- Signed code of conduct
- Your bank details
- Your emergency contact details
- Your Unique Taxpayer Reference (UTR)
- Your Teacher Reference Number (if applicable)

During the course of your engagement, additional data will be collected that will form part of your file, this includes:

- Records of observations of your lectures or PT role
- Records of any disciplinary actions
- Records of your performance
- Records of your pay details

Who will we share your data with?

We may need to share your data with outside organisations such as the Charity Auditors, legal professionals, Ofsted and the OIA.

In order for you to fulfil the terms of your contract, we will also need to share your details with Trustees, partnership school staff, trainees, candidates, applicants to our courses, suppliers and service providers.

Where you have complaints about data that has been shared with external organisations, please email our DPO, sue@ete.org.uk who is the single point of contact for any data complaints.

How long will we retain your data?

Please see our retention schedule [here](#).

- **Former self employed persons**

The data held for former self employed staff comprises the records held for the duration of the engagement.

Who will we share your data with?

We may need to share your data with outside organisations such as the Charity Auditors, legal professionals, Ofsted and the OIA.

Where you have complaints about data that has been shared with external organisations, please email our DPO, sue@ete.org.uk who is the single point of contact for any data complaints.

How long will we retain your data?

Please see our retention schedule [here](#).

What will we do with the information we hold?

We use the data we hold to allow you to fulfill your contract to provide your services to our organisation and to ensure that the services we provide are of the highest standard.

Some data must be collected due to legislation, or for the safeguarding of children. Data is not collected or stored unnecessarily.

SECTION 7

Trustees and Committee Members

Essex & Thames Education takes the security of data of Trustees and Committee Members and those applying for vacancies seriously and ensures that only persons authorised to do so can access the data.

Applicants to Trusteeship/Committee Membership

When you apply for a vacancy, your application will be received by a member of the Senior Leadership Team who will review your application. The details collected at the application stage are:

- Name
- Address
- Date of birth
- Phone Number
- Email Address
- Any other personal/special category data that the applicant chooses to include in their application form, such as disabilities
- Nationality
- Work history and unpaid experience
- Qualifications
- Safeguarding documentation, including:
 - Your self declaration form (SD2 form)
 - Details of the online presence check undertaken and the recommendations following this
 - Details of your DBS check
 - The results of any overseas police checks, if required
 - Details of any professional misconduct
- A copy of your CV

Who will we share your data with?

There will be no external sharing of your data.

How long will we retain your data?

Please see our retention schedule [here](#).

Current Trustees and Members

During your membership, the following additional data will be collected:

- Details of your attendance at meetings
- Details of your input into meetings by way of minutes

For Trustees, we will also add your details to the following systems:

- The Charities Commission
- Companies House

This data is publicly available.

Who will we share your data with?

We may need to share your data with outside organisations such as the Charity Auditors, legal professionals, Ofsted and the OIA.

We will also need to share your details with Trustees (if you are a committee member), partnership school staff, trainees, candidates, applicants to our courses, suppliers and service providers.

Where you have complaints about data that has been shared with external organisations, please email our DPO, sue@ete.org.uk who is the single point of contact for any data complaints.

How long will we retain your data?

Please see our retention schedule [here](#).

SECTION 8

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 observation feedback 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.

Who will we share your data with?

We may need to share your data with outside organisations such as the Charity Auditors, legal professionals, Ofsted and the OIA.

We will also need to share your details with Trustees, partnership school staff and trainees.

Where you have complaints about data that has been shared with external organisations, please email our DPO, sue@ete.org.uk who is the single point of contact for any data complaints.

How long will we retain your data?

Please see our retention schedule [here](#).

SECTION 9

Other Stakeholders

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.

Suppliers and Professional Service Providers (Excluding self employed providers)

We will hold the following data:

- Names and contact details of your staff
- Emails between both parties, limited to those that are necessary.

Who will we share your data with?

We may need to share your data with outside organisations such as the Charity Auditors, legal professionals, Ofsted and the OIA.

We may also need to share your details with Trustees, partnership school staff and trainees.

Where you have complaints about data that has been shared with external organisations, please email our DPO, sue@ete.org.uk who is the single point of contact for any data complaints.

How long will we retain your data?

Please see our retention schedule [here](#).

Referees for our applicants/trainees/former trainees/staff

We will hold the following data:

- Your name and contact details
- Your job title
- Emails between both parties, limited to those that are necessary

Who will we share your data with?

We may need to share your data with outside organisations such as the Charity Auditors, legal professionals, Ofsted and the OIA.

We may also need to share your details with Trustees, partnership school staff and trainees.

Where you have complaints about data that has been shared with external organisations, please email our DPO, sue@ete.org.uk who is the single point of contact for any data complaints.

How long will we retain your data?

Please see our retention schedule [here](#).

Outside Agency Staff

We will hold the following data:

- Your name and contact details
- Your job title
- Emails between both parties, limited to those that are necessary

We will only retain your data in line with legal requirements and will not use the data for any other purpose.

Who will we share your data with?

We may need to share your data with outside organisations such as the Charity Auditors, legal professionals, Ofsted and the OIA.

We may also need to share your details with Trustees, partnership school staff and trainees.

Where you have complaints about data that has been shared with external organisations, please email our DPO, sue@ete.org.uk who is the single point of contact for any data complaints.

How long will we retain your data?

Please see our retention schedule [here](#).

OUR LEGAL BASIS FOR PROCESSING

Essex and Thames Education 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 lawful basis for processing data is Public Interest, as outlined in the legislation:

- Article(1)(e) of the UK General Data Protection Regulation (UK GDPR)
- Section 8(d) of the Data Protection Act (DPA) 2018

The lawful basis for processing Special Category Data is Substantial Public Interest, as outlined in the legislation:

- Article 9(2)(g) of the UK GDPR
- Data Protection Act 2018 - Schedule 1: Part 2

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 Education, 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 Education;
- Effectively handling any legal claims or regulatory enforcement actions taken against Essex and Thames Education;
- 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 sue@ete.org.uk or call our office on 01268 988580. 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;
- 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;
- 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:

- If the processing is necessary for public health purposes in the public interest (e.g. 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
- If the processing is necessary for the purposes of preventative or occupational medicine (e.g. 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 Education 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:

- You contest the accuracy of your personal data held and you are verifying the accuracy of the data;
- Your data has been unlawfully processed and you oppose erasure and request restriction instead;
- Essex and Thames Education no longer needs the data, but you need us to keep the data in order to establish, exercise or defend a legal claim, or;
- You have objected to Essex and Thames Education 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:

- We have your consent for further processing;
- The processing is for the establishment, exercise or defense of legal claims;
- It is for the protection of the rights of another person (natural or legal);
- 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 Education 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 Education, either directly or by way of consequence of our contract, contact, training or agreement.

The right to data portability applies when:

- Our lawful basis for processing this information is consent or for the performance of a contract; and
- 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:

- The processing is based on legitimate interest or the performance of a task in the public interest/exercise of official authority, including profiling;
- 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:

- We are able to demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the individual; or
- 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 Education 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 an 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:

- Necessary for the entry into or performance of a contract;
- Authorised by Union or Member State law applicable to the controller; or
- 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 checks to ensure that systems are working as intended.

International Transfers

All of the systems we use are cloud based and some are not located in the UK. Where data is transferred outside of the EU, we check that the provider either uses EU Standard Contractual Clauses and countries with adequate provision or has a Data Privacy Framework in place. The list attached below indicates any of our systems used that are not located in the UK. To check data privacy frameworks, please follow this link:

<https://www.dataprivacyframework.gov/list>

SYSTEMS AND THIRD PARTIES

 Data Protection: List of Systems Used

 Data Protection: List of Processors Used (Linked in Privacy notice)

DATA RETENTION SCHEDULE

Our Data Retention Schedule can be found here:

 [Data Retention Schedule January 2025 V1](#)

ICO CONTACTS

Data Protection Officer Sue Rudgley
01268 988580 **Email:** sue@ete.org.uk

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

<https://ico.org.uk/make-a-complaint/>

How to Complain

You have a right to make a complaint about the use of your data.

In the first instance, please make your complaint to our DPO, Sue Rudgley, by emailing sue@ete.org.uk.

If you are not satisfied with the response, please contact the ICO on the details above. Our registration number is ZB444055.