

Privacy Notice – Mulberry College of Teaching, Mulberry Schools Trust

1. Introduction

- 1.1 Under data protection law, individuals have a right to be informed about how Mulberry College of Teaching (Mulberry Schools Trust) uses any personal data that is held about them. We, Mulberry College of Teaching, comply with this right by providing a **Privacy Notice**, which details where we are processing your personal data.

2. Document purpose

- 2.1 The purpose of this Privacy Notice is to explain how we, Mulberry College of Teaching, collect, store and use personal data about individuals (Applicants, Participants, Mentors and School Leaders), who are applying to, or part of our programme.
- 2.2 Courses include all Initial Teacher Training (ITT) led by Mulberry College of Teaching, School Experience Placements and other programmes led by Mulberry College of Teaching.

3. Definitions

- 3.1 **Mulberry College of Teaching** is DfE accredited provider for ITT.
- 3.2 An **Applicant** is deemed to be an individual seeking a place on one of our ITT courses, who may register an interest in opportunities, or complete an electronic form(s) as part of the recruitment process. Applicants are required to complete mandatory requests for information as part of this process and will remain an Applicant until the contractual commencement of the training programme.
- 3.3 A **Participant** is deemed to be an individual who has successfully enrolled on one of the programmes listed in paragraph 2.2.
- 3.4 A **Mentor** is deemed to be a school-based individual who is supporting a Participant on their professional development programme.
- 3.5 A **School Leader** is deemed to be an individual who is supporting Participants and their Mentors on one of our teacher education programmes.

4. Data controller and processors

- 4.1 Mulberry College of Teaching is the **Data Controller** for the purposes of data protection law and will therefore determine the purposes for which personal data is processed (the 'why' and the 'how').
Our postal address is:
Mulberry College of Teaching
c/o Mulberry School for Girls
Richard Street
London
E1 2JP
- 4.2 Mulberry College of Teaching will work with other Data Controllers, using a Controller-to-Controller data sharing agreement where a sub-contracting arrangement is in place. Where necessary, sub-contracted delivery partners will be instructed to share their Privacy Notices with Applicants and Participants.
- 4.3 Authorised third parties, (e.g. the DfE), process and 'use' data on behalf of (under the supervision/control) the Federation and are therefore **Data Processors**.
- 4.4 Mulberry College of Teaching is also a **Data Processor** in its own right for information provided to it from third parties acting in the capacity of a Data Controller (see paragraph 10.5). Applicant information provided to Mulberry College of Teaching by such third parties, will continue to be owned by the original Data Controller until such time that the Participant starts one of Mulberry College of Teaching's programmes.
- 4.5 Mulberry College of Teaching will ensure that your personal data is processed fairly and lawfully, is accurate, is kept secure and is retained for no longer than is necessary.

5. The categories of personal data we hold

- 5.1 We process data relating to Participants on our programmes. The nature of the personal data we collect depends on the programme you are applying for.
- 5.2 Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not limited to:
- **Personal information**, including name, maiden name/previous name, contact details, date of birth, email address and other personally identifiable data, which is required in order to process your training application;
 - **Characteristics**, such as race, ethnicity, nationality, disability and sexual orientation in order to demonstrate equality and diversity (such data will be optional);
 - **Recruitment information**, including copies of right to work documentation, references, DBS check and Expression of Interest (EOI) as part of the application process;
 - **Qualifications and employment records**, including academic qualifications, work history, job titles, working hours, training records and professional memberships;
 - **Professional Information**, including previous employer, address, main role, contract type (perm/temp), Qualified Teacher Status, Teacher Reference Number, QTLS Number, current job if not teaching, main subject taught, additional subject taught, Qualified Age Range, ITT Subject, ITT Institution, years of mentoring experience.
 - **Assessment and performance data**, such as training or induction reports and grades,

attendance data, outcomes of any disciplinary and or grievance procedures, lesson observations, portfolios and final assessment outcomes and data. This information is shared with external bodies such as DfE, Teacher Regulation Agency etc. as required;

- **Other**, including National Insurance Number, details of previous CPD engagement (e.g. previous schools), start and end date, mid-term start date, attendance and absences information, responses from satisfaction surveys, information required to conduct recruitment/background/DBS correctly and health and sickness records, if required.

6. Why we use this data

6.1 The purpose of processing the above personal data is to enable Mulberry College of Teaching to facilitate the administration of our teacher education programmes. The personal data is used for various reasons, including to:

- assist us in finding a training placement or professional development programme that is most suitable for you;
- match your details with other training opportunities where required for further training purposes, following successful completion of a training course;
- register you with the DfE trainee Teacher Portal (and generate a unique Teacher Reference Number)
- Enable you to be paid any scholarship, bursary or salary, depending on programme and eligibility
- Support you to thrive on the programme
- Provide references for your future employment
- facilitate safe placement of training, as part of our safeguarding obligations towards students;
- enable equalities monitoring;
- fulfil contractual or statutory obligations with any third parties;
- to answer any enquiries you may have during the applicant process;
- to inform you of careers and employment services, and advise you of Teaching School Hub news, updates, events, reports and other information. Where we do so, you will be able to unsubscribe from such communications.

7. Our lawful basis for using this data

7.1 We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- process your application for a programme with Mulberry College of Teaching ;
- fulfil a contract/agreement with you/your employer
- comply with DfE statutory guidance.

7.2 We may also use personal information about you where:

- you have given us consent to use it in a certain way e.g. safeguarding checks, reference requests, marketing and recruitment.

7.3 Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so.

7.4 Some of the reasons listed above for collecting and using personal information about you overlap,

and there may be several grounds which justify Mulberry College of Teaching's use of your personal data.

8. Collecting this information

- 8.1 The personal information we collect about you comes primarily from applications or other forms you submit to Mulberry College of Teaching and/or via a third-party application process (see 10.5).
- 8.2 Whilst the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us. Whenever we seek to collect information from you, we will make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice. However, failure to provide some of the requested information may result in our being unable to carry out checks on recruitment/background/DBS correctly and therefore impact on any subsequent training if statutory.
- 8.3 We will try to ensure that all information we hold about you is accurate, complete and up to date, but we expect you to help us in this regard by promptly notifying us if there are any changes to your personal information.

9. How we store this data

- 9.1 Mulberry College of Teaching, create and maintain an individual file for each Applicant/ Participant for as long as they remain on the course. It is retained throughout the training year(s) and beyond in the case of any successive training or a delay to assessment, including interruption or mitigating circumstances. The information contained in this file is kept secure and is only used for purposes directly relevant to your training.
- 9.2 Personal data will not be retained by Mulberry College of Teaching for longer than is necessary in relation to the purpose for which it was collected. Lengths of data retention will vary depending on whether a Participant successfully completes the training course, withdraws or takes an intentional break during training. Data is retained for a maximum of seven years.
- 9.3 Once your association with Mulberry College of Teaching has ended, we will retain/delete the information within your file in accordance with the timelines set out below:
- Personal data of unsuccessful Applicants will be held for 18 months so that Applicants can be advised of future training opportunities;
 - Personal data of Applicants completing their courses will be held for seven years;
 - Personal data will be deleted within one month of the request, unless we are required to retain such personal data in line with our statutory and/or regulatory obligations.

10. Data sharing

- 10.1 We will only share personal information about you with trusted external service providers (third parties, see 10.5) where the law and our policies allow us to do so, or where we have your consent.

- 10.2 All our third-party service providers are carefully selected, meet high data protection and security standards and are bound by an agreement to keep any information we share with them confidential. We only share the personal data with them that is necessary for the services they provide, and they will only process that data in accordance with our instructions.
- 10.3 We will never share your data with any third party for their own marketing purposes and we will only disclose your data to another third party without your express consent when we are legally required to do so e.g. safeguarding related information.
- 10.4 We may also release personal information to regulatory or law enforcement agencies, if they require us to do so.
- 10.5 Some of the following delivery partners may also collect information from you directly and share it with us, such as registers of interest.

Third Party	Purpose for sharing
<ul style="list-style-type: none"> ▪ Department for Education 	To track and monitor engagement in DfE funded programmes and comply with statutory requirements
<ul style="list-style-type: none"> ▪ Trainee Teacher Portal 	To register you a trainee teacher, in order to generate a unique Teacher Reference Number which will stay with you throughout your career
<ul style="list-style-type: none"> ▪ Ofsted 	As required as part of their inspection of our programme as an accredited provider
<ul style="list-style-type: none"> ▪ Sheffield Hallam University (PGCE Provider) 	To support your engagement in the PGCE element of the programme, including enabling you access to student services.
<ul style="list-style-type: none"> ▪ Teaching Regulation Agency 	For regulation of the teaching profession, including misconduct hearings and the maintenance of the database of qualified teachers.
<ul style="list-style-type: none"> ▪ Student Loans Company (Higher Education Portal) 	To manage finances such as tuition fee loans, maintenance loans
<ul style="list-style-type: none"> ▪ Student Finance England 	To manage the payment of bursaries and scholarships
<ul style="list-style-type: none"> ▪ Corazon Health (Occupational Health) 	To determine your health and physical capacity to Train to teach (Fitness to Teach)
<ul style="list-style-type: none"> ▪ Local partner schools/organisations formally sub-contracted to work with Mulberry College of Teaching 	To jointly deliver the programme to Participants and quality assure the training, such as the External Moderator
<ul style="list-style-type: none"> ▪ East London Teaching School Hub 	So that you can be informed of relevant professional development opportunities and news in our region

<ul style="list-style-type: none"> ▪ Your future employers 	<p>To provide information on qualifications and references (at your request)</p>
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10.6 We may also share your personal data with third parties in connection with providing references and for verification of the details you have provided from third party sources (e.g. psychometric evaluations or skills tests).

11. Data usage

11.1 When you visit Mulberry College of Teaching's website, we may automatically collect information including:

- **Information about your visit**, including the areas users access most frequently and which services users access the most (we only use such data in the aggregate form). This information helps us determine what is most beneficial for our users and how we can continually improve our online services to create a better overall experience for our users.
- **Marketing profiling** to help us identify services or programmes which may be of interest to you. The information collected is stored and is used for aggregated and statistical reporting and is not shared with anybody else.

11.2 If you receive emails from us, we may use certain analytics tools to capture data such as when you open our email or click on any links or banners our email contains. This data helps us to gauge the effectiveness of our communications and engagement campaigns.

12. Cookies

12.1 Cookies are small text files that are placed on your electronic device to help our website provide a better user experience. Cookies are stored on your individual device and you have full control over their use. You may deactivate or restrict the transmission of cookies by changing the settings of your web browser. Cookies that are already stored may be deleted at any time. To find out more about cookies and how to manage or delete them, visit www.aboutcookies.org.uk.

12.2 If you choose to disable cookies, you may not be able to use all the features on our website.

13. Transferring data internationally

13.1 We will not as a rule transfer any of your data to any third party outside the European Economic Area (EEA). If such a situation did arise where this became a requirement, we will do so in accordance with data protection law.

14. Photographs and videos

14.1 As part of Mulberry College of Teaching activities, we may take photographs and on occasion allow external organizations to take photographs or film Participants. Any Participants will be made aware that this is happening and the context in which the photograph will be used.

14.2 Mulberry College of Teaching will take photographs for its own use. Usually these will be unnamed and will generally be for internal use, but may also include photographs for publication, such as:

- Unnamed photographs included in prospectus, brochure or bulletin/newsletter.
- Unnamed photographs to be used on display boards, which can be seen by visitors to the Hub base..
- Unnamed photographs included in a presentation at an event for prospective Applicants
- Named photographs of Participants to be used internally for vetting sheets, ID photographs and for building passes (these will be shared with our partners for safeguarding, access and identification purposes).
- Unnamed photographs or videos of Participants published on websites, Twitter and Facebook sites (these will be closely monitored by Mulberry College of Teaching to ensure they are appropriate).

14.3 When a photograph intended for publication is taken, Participants will be informed that a photograph is being taken and told what it is for so they can object if they so wish.

For all other purposes, if Mulberry College of Teaching want to use **named photographs**, we will obtain specific Participant consent first. Consent will also be sought if the intention is to use a Participant photograph on an external third-party social media site, such as LinkedIn. Other examples where we will ask for consent are:

- A case study on a Participant e.g. in a prospectus, which focuses on one Applicant.
- Video recordings of remote lessons or tutorials with Applicants where videos have been turned on.
- A photograph or video used in a third-party publication e.g. a local or national newspaper, with or without the Participant's name.
- A photograph or video displayed in a prominent place, with or without the Participant's name e.g. on a billboard

15. CCTV

At Mulberry College of Teaching and at Mulberry Schools Trust schools' CCTV is operated on site. This is considered necessary to protect the reputation, safety and property of staff, Participants and students.

16. Other websites

16.1 Please note that clicking on links and banner advertisements may result in your transferal to another website where data privacy practices may be different to that of Mulberry College of Teaching. Visitors should consult the other websites' privacy policies as we are not responsible for, and have no control over, information that is submitted to or collected by these third parties.

17. Requesting access to your personal data

17.1 You have a right to make a 'subject access request' to gain access to the personal information that we hold about you, as long as we judge that you can properly understand your rights and what they mean. If you want to make a request, please contact Mulberry College of Teaching in the first instance.

18. Other rights

- 18.1 Under data protection law, you have certain other rights regarding how your personal data is used and kept safe, including the right to:
- say that you don't want it to be used if this would cause, or is causing harm or distress;
 - stop it being used to send you marketing materials;
 - say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than a person);
 - have it corrected, deleted or destroyed if it is wrong, or restrict our use of it;
 - seek redress, either through the Information Commissioner's Office (ICO) or through the courts.
- 18.2 If you wish to exercise any of these rights, please contact Mulberry College of Teaching in the first instance. Alternatively, you can contact Mulberry College of Teaching's **Data Protection Officer**:
The Data Protection Officer, Satswana Ltd, Pembroke House, St Christopher's Place, Farnborough, Hampshire, GU140NH. Email:info@satswana.com; Tel:01252516898.
- 18.3 You are not required to pay any charge for exercising your rights. If you make a request, we have **one month** to respond to you.

19. Complaints

- 19.1 We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with the DPO in the first instance.
- 19.2 Alternatively, you can make a complaint to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data. The ICO's address and contact details are listed below:

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

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>