



# TRAINEE PRIVACY POLICY

Secondary, Primary and Early Years

## OBJECTIVES

First class teacher education designed to inspire and develop high levels of personal and professional conduct in teachers who will impact significantly on pupil progress

Bright Futures SCITT  
QTS and EYTS education

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## Introduction

This policy explains the practices employed by Bright Futures SCITT in collecting and using trainees’ information and the ways this can be influenced by trainees on the course.

The SCITT will collect information from trainees from the point of application and at certain points in the course to ensure that all SCITT policies are followed and that the Secretary of State’s ITT or EYITT criteria are followed with compliance.

## Scope of Policy

This policy aims to ensure that the processing of information relating to trainees, including the obtaining, holding, use or disclosure of such information is done in accordance with General Data Protection Regulation and Data Protection Act 2018 (when it receive Royal Assent).

## Data that is collected

The categories of information we collect, process, hold and share in order to carry out the programme include:

- **Personal information** (Including data such as name, address, phone number, date of birth, personal email address, Teacher Reference Number. All trainees will be issued with a SCITT email address for the duration of the course.)
- **Selection information** (including GCSE (or equivalent) results, degree results and performance in the DfE QTS skills tests.) In addition, it is necessary to collect information pertaining to the assessment centre activities. It is also necessary to collect information to ensure trainees have met the non-academic section criteria, including information from a Disclosures and Barring Check, a health and physical capacity to teach assessment.
- **Financial information** (Including trainees who will be in receipt of bursary payments it will be necessary to collect information including the name of any bank and account details used by trainees.)
- **Performance information** (Including information from school mentors and SCITT staff on performance and activities in school placements.)

## The purposes for which the data is collected

We will use a trainee's data to help provide a better experience during the programme and to ensure that the SCITT is compliant against the Secretary of State's ITT Criteria. Specifically:

### Personal information

To communicate with trainees and enable the development of a comprehensive picture of the trainee cohort and how it is deployed. All trainees will be issued with a SCITT email address for the duration of the course. This email will be managed in accordance with the Trust's e-mail account rules and any applicable policies for the use of our IT systems.

### Selection information

In order to ensure trainees have met the SCITT's academic and non-academic selection criteria including demonstration of the SCITT's ability to meet the secretary of state for education's ITT Criteria.

### Financial information

In order to process any financial aspects of the course, specifically DfE ITT bursary payments.

### Performance information

In order to ensure trainees have demonstrated meeting or exceeding the teachers' standards by the end of the programme to be recommended for QTS or EYTS.

### Disclosure and Barring Checks

The SCITT is not required or obliged to share information relating to the level, date and number of DBS checks. NCTL has confirmed that such information can be shared with the permission of the trainee; this information will not be shared with schools without written permission. The SCITT contacts all placement schools to confirm that suitability checks have been completed.

### Health declaration

In accordance with DfE circular no. 4/99 the SCITT will keep the declaration of health and any supporting papers for as long as it is considered necessary to answer potential enquiries from prospective employers. Medical information may only be released to a third party with the consent of

the person to whom it relates at the time the disclosure is to be made. We will seek this consent from trainees as and when required.

### Sharing with third parties

- We will share trainee personal information with the National College of Leadership via the secure NCTL Data Management System for the administration and monitoring of initial teacher training schemes.
- We will share trainee personal information with our PGCE partner (the University of Manchester) for the purposes of supporting their delivery of the PGCE portion of the programme.
- We will share trainee personal and performance information with partner schools to facilitate a smooth transition from central training to school placements. This will be limited to name and applicable performance information.
- We will only share trainee information with potential employer schools if we have received a request to act as a referee for applications.
- On our servers and e-mail accounts provided by third-party suppliers that are under contractual conditions to safeguard your data.

In all of the above situations we will only share that information that is necessary to ensure the maximum impact of our training programmes and no other information.

### The lawful basis on which we process this information

We process this information under Article 6 and 9 of the GDPR (May 2018):

- Processing is necessary for compliance with a legal obligation to which the Trust is subject. We have set out above when we need to share information with NCTL.
- Processing is necessary for the performance of a task carried out in the public interest - which in this case is when we are providing training which is publically funded for trainees to become teachers.
- Substantial public interest - when we are required to process medical information on trainees or criminal conviction data we do so because the law requires us to or it is in the substantial public interest to ensure that trainees are suitable for working with vulnerable pupils and to enter the teaching profession.
- Equal opportunities monitoring: we collect information about sex, sexual orientation, ethnic origin, religious/philosophical beliefs and geographical information in order to monitor the diversity of applicants and trainees. Whenever possible we anonymise this data so as to remove any personal identification.

### Marketing data

We use your comments, opinions, feedback and photographic data to support the evaluation and marketing of the SCITT. In addition, we retain your data to advertise courses that we feel are suitable for your future development, such as the NQT conference, following completion of the SCITT course. We process this information when you have provided us with your consent. You can withdraw such consent at any time.

This means that we will ask you for your specific consent for each of the above uses of your data.

## Collecting this information

Whilst the majority of information trainees provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform trainees whether it is a requirement to provide certain information to us or if there is a choice in this. Trainees will be informed during any induction sessions prior to the commencement of the course.

## Storing this information

Once we have received trainee data we will ensure that it is treated with the utmost respect in accordance with the data protection principles and any applicable regulations. Data will be stored on our secure, password protected server within the UK and in locked filing cabinets in a secure building that requires key card access. We follow strict security procedures in order that the data we collect is stored and disclosed appropriately and securely. We will only keep your information for as long as required to carry out the duties of the SCITT.

- DBS information will be held for 6 months
- Trainee performance data will be held for 7 years for the purposes of analysis for performance of the SCITT
- Medical information will be held in accordance with DfE circular no. 4/99 as noted above

## Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact our Data Protection Officer via [dataprotection@bright-futures.co.uk](mailto:dataprotection@bright-futures.co.uk)

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- Raise a complaint with the Information Commissioner's Office or seek judicial remedy in certain circumstances

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with our Data Protection Officer in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

### Further information

If you would like to discuss anything in this privacy notice, please contact:

Lynette Beckett  
Data Protection Officer  
Bright Futures Educational Trust  
The Hub  
144 Irlam Road  
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