

# PRIVACY NOTICE – TRAINEE TEACHERS



This privacy notice advises trainee teachers of CTSN's data protection responsibilities on the collection and processing of their personal information.

This notice provides details about:

- The personal information we collect on trainee teachers.
- How we collect that personal information.
- What we do with the personal information.
- Your rights in relation to any personal information held and processed by the school.

Martin Lee, Director of Teacher Education is the person with responsibility for ensuring that trainee teachers personal information is held and processed in the correct way. He can be contacted at [mlee@catrust.co.uk](mailto:mlee@catrust.co.uk). Questions about this policy, or requests for further information, should be directed to him.

## What is personal information and what does processing mean?

Personal information is any information that relates to you that can be used directly or indirectly to identify you.

This includes information such as your name, date of birth and address as well as information relating to your medical details. This may also include sensitive personal information, such as your religion or ethnic group, photos and video recordings.

Personal information and processing are defined as follows:

- Personal data means any information relating to an identified or identifiable natural person (data subject). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (GDPR article 4).
- Special categories of personal data means information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and biometric/genetic data (GDPR article 9).
- Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction (GDPR article 4).

## **Data protection principles**

We process personal data about trainee teachers in accordance with the following data protection principles:

- We process personal data lawfully, fairly and in a transparent way.
- We collect personal data only for specified, explicit and legitimate purposes.
- We process personal data only where it is adequate, relevant and limited to what is necessary for the purposes of processing.
- We keep accurate personal data and take all reasonable steps to ensure that inaccurate personal data is rectified or deleted immediately.
- We keep personal data in a form, which permits identification from personal data for no longer than is necessary for the purpose of the processing or, if for longer periods, for such reasons as permitted by the GDPR.
- We adopt appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, accidental loss, destruction or damage.

In our privacy notices, we tell individuals the reasons for processing their personal data, how we use such data and the legal basis for processing. We will not process personal data of individuals for reasons other than the stated purpose or purposes.

Where we process special categories of personal data or criminal records data to perform obligations, this is done in accordance with a policy, or for legal reasons. We will update personal data promptly if an individual advises that his/her information has changed or is inaccurate.

## **Our legal basis (grounds) for using trainees teachers' personal data**

There are several reasons why we hold, process and share pupils' personal data. Under data protection laws, the lawful reasons for processing personal data include:

- Consent.
- To comply with a legal obligation.
- To protect the vital interests of the pupil or another person.
- For a task carried out in the public interest.
- For a legitimate interest of the school or the trainee teacher or one of the organisations it shares data with (e.g. legal adviser) except where those rights are overridden by the interests or fundamental rights and freedoms of the data subject which require protection, particularly in the case of a child.

Sometimes the handling of trainees' personal data falls within several of the above lawful grounds.

## **Consent**

We may ask for your consent to use your information in certain ways. If we ask for your consent to use your personal data, you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid.

## **Legal obligation**

This is where we need to use trainee teachers' personal data to comply with a legal obligation.

Statutory reporting requirements to the Department for Education (DFE) are included within this section. As is disclosing information to third parties such as the courts or the police where we are legally obliged to do so.

## **Vital interests**

This legal basis can be used where, for example, we need to disclose information about trainees to prevent them or someone else from being seriously harmed. An example can include providing information to a medical professional about a trainee in circumstances where they are unable to provide the information themselves. It is likely to cover an emergency medical situation.

## **Public interest**

We consider that we are acting in the public interest when providing adult education.

Specifically, we have a public interest in:

- Providing adult education.
- Fulfilling our safeguarding obligations and investigating complaints that may be directly connected with you or may require access to your personal data when investigating complaints by others.
- Promoting the interests of CTSN, and its various partnership schools.
- Managing the CTSN SCITT efficiently.

## **Legitimate interests**

We have many legitimate interests for which we hold, retain, process and share trainee teachers' personal data. For example we may need to use your personal email address to contact you with relevant information to your training, although we shall use the camteach email account where this is possible. The GDPR states that the exception to using this ground is where it is detrimental to a trainee's rights.

## **Why do we collect and process trainee teachers' personal data?**

We use trainee teachers' personal data to:

- Support trainee teachers learning.
- Monitor and report on trainee teachers' progress.
- Provide appropriate pastoral care.

- Assess the quality of our services.
- Comply with the law regarding data sharing.

### **How do we obtain personal data?**

We obtain personal data in a variety of ways. Some of the information comes from the admissions forms and acceptance forms which have been supplied to us. We also receive information about student trainees from other schools and agencies, such as healthcare professionals.

### **With whom do we share teacher trainee's personal data?**

We do not share information about our trainee teachers with anyone without consent unless the law and our policies allow us to do so.

We share trainee teachers' data with the DFE on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

Trainee teachers' data, where it is reasonable to do so, may also be shared with other professionals contracted by the school, such as legal and professional advisers or insurers. In addition, a data security contract with a third-party IT services provider or as part of cloudbased storage may also process your personal data for the purpose of securely holding and protecting your data.

We are required by law to provide information about our trainee teachers to the DFE as part of statutory data collections, such as the ITT census.

### **Third parties**

The DFE may share information about our pupils with third parties who promote the education or well-being of learners in England by:

- Conducting research or analysis.
- Producing statistics.
- Providing information, advice or guidance.

The DFE has robust processes in place to ensure the confidentiality of our data is maintained. There are stringent controls in place regarding access to and use of the data. Decisions on whether the DFE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- Who is requesting the data.
- The purpose for which it is required.
- The level and sensitivity of the requested data.
- The arrangements in place to store and handle the data.

To be granted access to trainee teachers' information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the DFE's data sharing process, please visit:  
[www.gov.uk/dataprotection-how-we-collect-and-share-research-data](http://www.gov.uk/dataprotection-how-we-collect-and-share-research-data).

For information about which organisations the DFE has provided trainee teachers information to (and for which project), please visit their website.

### **Further examples of why we collect, hold and share trainee teachers personal data**

Here are some further examples of why we collect, hold and share trainee teachers' personal data. If you would like more information about any of these, please contact our Data Protection Officer.

- We may need to share teacher trainee's information about your health and wellbeing with those who have responsibility for welfare.
- We need to tell all appropriate members of staff if you have specific medical needs.
- We need to tell all appropriate members of staff if you might need extra help with some tasks.
- We may need to provide information containing your personal data to other schools and colleges. We may need to pass on information which they need to look after you.
- We may need to share data with external examination boards.
- We may share information about you between the partnership schools where you are placed.
- We will only share your information with other people and organisations when we have a legitimate reason to do so.
- If you are involved in a serious incident, and the police have become involved, we may need to share information with the police and record any action take.
- Sometimes we need to share information with the police or our legal advisers to help with an inquiry. For example, safeguarding issues or injuries.
- We might need to share trainees' information with consultants, experts and other advisers who assist us in the running of the SCITT, or any of our partnership schools, if this is relevant to their work.
- On occasions external consultants/contractors may have temporary access to personal data held by a school. For example, IT consultants might be granted temporary access to trainees' personal data in order to fulfil their contract(s). Access

will only be granted to consultants who have demonstrated compliance with the school's data protection standards.

- The school uses various IT systems. This may include using cloud-based storage systems to hold trainee teachers data. Before use, the school ensures that adequate security measures are in place.
- We may need to share some information with our insurance provider to ensure we maintain cover or to process any claims.
- We may need information about any court proceedings or judgements concerning you. This is so that we can safeguard your welfare and the welfare of others at the school.
- We may monitor your use of any partnership school's email, internet and other electronic devices provided by the school e.g. iPads. We monitor in order to ensure appropriate use of these technologies and to confirm that you are not putting yourself at risk of harm.
- We may use photographs or videos of you on our website, social media sites, newsletters and publications as part of our advertising for SCITT.
- We publish our exam results and other news on the website. We also send articles, photographs and videos to local and national news outlets to celebrate successes.
- Sometimes we use photographs and videos to support curriculum activities, for example, to provide feedback on a presentation you may have given.

### **Automated decision-making and profiling**

We do not make automatic decisions or undertake automated decisions regarding individuals to evaluate certain information about an individual (profiling).

### **Special categories of personal data**

We must also comply with an additional condition where we process special categories of personal data. These special categories include: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about sex life or orientation.

Some of the reasons we process such data on trainee teachers include:

- Legal claims. The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisers and insurers.
- Medical purposes. This includes medical treatment and the management of healthcare services.
- For compiling census data as required by law.

*(The SCITT will always consider their Public Sector Equality Duty in accordance with the Equality Act 2010 and how special categories of personal data may be processed to comply with legal obligations).*

### **How do we protect trainee teachers' personal data?**

We take the security of trainee teachers personal data very seriously. We have internal policies and controls in place to try to ensure that data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties.

Where we engage third parties to process personal data on our behalf, they do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data. For example, we recommend that any partnership school uses encrypted devices, uses passwords, virus protection and has appropriate firewalls.

### **Sending information to other countries**

With cloud-based storage and some other services sometimes being supplied outside the UK, personal data can be sent to other jurisdictions.

Some of our servers and storage systems are based in the EU or the European Economic Area (EEA) and we have ensured that appropriate safeguards are in place to protect pupils' personal data.

### **How long do we keep trainee teachers personal data?**

We keep trainee teachers personal data for the time they are at our school. We will also keep certain information after trainees have left the SCITT. A copy of our Retention Schedule is available from the school website or from the Data Protection Officer.

### **What rights do you have in relation to your information?**

When the GDPR comes into force in May 2018, you will have the following rights in relation to your personal data. Some of these rights are new.

- The right of access to the personal data and supplementary information. This right is to enable you to be aware of and verify the lawfulness of the personal data we are processing.
- The right to rectification. This right allows you to have personal data rectified if it is inaccurate or incomplete.
- The right to erasure. This is also known as the 'right to be forgotten'. This is not an absolute right and applies in specific circumstances.
- The right to restrict processing. This right applies in circumstances where, for example, the data subject contests the accuracy of the data or challenges the public interest or legitimate interest basis. Further guidance can be obtained from the ICO's website.

- The right to data portability. This allows individuals to obtain and reuse their personal data for their own purposes.
- The right to object. Individuals have the right to object to:
  - Direct marketing.
  - Processing for scientific/historical research and statistics (other than our statutory duty to share data with DfE or other agencies, outlined above).
- Rights in relation to automated decision making and profiling.

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance by contacting the SCITT Data Controller; Martin Lee, [mlee@catrust.co.uk](mailto:mlee@catrust.co.uk). If you would like to exercise any of the above rights please contact The Cam Academy Trust Data protection officer: - Carolyn Duckett [cduckett@catrust.co.uk](mailto:cduckett@catrust.co.uk)

Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns> to raise any issues you have.