

Data Protection Policy

This data protection policy explains CTSN SCITT's data protection responsibilities on the collection and processing of the personal information.

Data protection controller

For the purposes of the Data Protection Act (2018) we confirm that the data controller is CTSN SCITT, an accredited ITE provider, at Comberton Village College, West Street, Comberton, Cambridge CB23 7DU.

We also contract a number of 'data processors' who process or store personal data on behalf of CTSN SCITT for example suppliers of IT and other systems. We ensure that our contracts with these processors are compliant with the *Data Protection Act (2018)* and that your data is kept safe by these companies.

Scope

CTSN SCITT needs to gather and use certain information about individuals. These individuals include employees, trainees, suppliers and other people the organisation has a relationship with or may need to contact. This policy describes how this personal data must be collected, handled and stored to meet the SCITT's data protection standards — and to comply with the law.

Why this policy exists

This data protection policy ensures CTSN SCITT:

- Complies with data protection law and follow good practice
- Protects the rights of staff, trainees and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

Data protection principles

The *Data Protection Act 2018* describes how organisations — including CTSN SCITT, that use personal data must follow data protection principles. They must make sure the information is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary

- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

Your rights

Under the *Data Protection Act 2018*, you have the right to find out what information the government and other organisations store about you. These include the right to:

- be informed about how your data is being used
- access personal data
- have incorrect data updated
- have data erased
- stop or restrict the processing of your data
- data portability (allowing you to get and reuse your data for different services)
- object to how your data is processed in certain circumstances

You also have rights when an organisation is using your personal data for:

- automated decision-making processes (without human involvement)
- profiling, for example to predict your behaviour or interests

NB there are exceptions when these principles do not apply (*see page 9*).

How the law protects you

CTSN SCITT also understands that we must have a lawful basis in order to process your personal data, as outlined in Article 6 of the *General Data Protection Regulation (GDPR) 2018*.

At least one of these must apply whenever we process your personal data:

- **Consent:** you have given clear consent for us to process your personal data for a specific purpose
- **Contract:** the processing is necessary for a contract we have with you
- **Legal obligation:** the processing is necessary for us to comply with the law (not including contractual obligations)
- **Public task:** the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law
- **Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party

What information we collect about you and what we use it for

Depending on our relationship with you, we may use your personal data in a number of ways:

Relationship with CTSN SCITT	What data we collect about you	What we use your data for	Lawful basis
Staff directly employed by CTSN SCITT (ie by Comberton VC)	Contact details (home) Contact details (work) Socio-demographic Financial Contractual and HR Documentary Data Identification number Consents	To manage our relationship with you To contract you for work To ensure we fulfil our obligations as part of our contract with you	Contract Legal basis Consent
Staff who work for partners schools but are contracted to work for the SCITT	Contact (work) Contractual and HR Documentary Data Identification number Consents	To manage our relationship with you To contract you for work To ensure we fulfil our obligations as part of our contract with you	Consent
Mentors Senior Tutors Professional Tutors SCITT Tutors ITE co-ordinators Subject Specialists Leads	Contact (work) Documentary Data Identification number Consents	To manage our relationship with you To contract you for work	Consent
Suppliers	Contact (work) Financial Contractual	To manage our relationship with you To ensure we fulfil our obligations as part of our contract with you	Contract Legal basis
Guest speakers / Guest tutors	Contact (work) Financial Contractual Documentary Data Consents	To manage our relationship with you To contract you for work To ensure we fulfil our obligations as part of our contract with you	Contract Legal basis Consent
Trainees	Contact (home) Contact (work)	To manage our relationship with you and deliver our services (where applicable this includes CTSN SCITT senior tutors, professional	Contract Legal basis

Relationship with CTSN SCITT	What data we collect about you	What we use your data for	Lawful basis
	Socio-demographic Financial Identification numbers Equal opportunities information Consents Programme assessment and evaluation Documentary data Attendance Photos	tutors, mentors, SCITT administrators, schools in our partnership /network and PGCE administrators for non-salaried trainees) To ensure you receive information about your course To provide you with support and guidance To respond to complaints and queries and aim to effectuate these To collect money for services To comply with Department for Education requirements (for registration, certification and Census purposes) To ensure Occupational Health checks are completed (for non-salaried trainees only) To complete Student Finance England (non-salaried trainees only, To co-ordinate manage the PGCE with Greenwich University (secondary SCITT non-salaried trainees only), ARU (primary SCITT non-salaried trainees only) To comply with our safeguarding commitments (DBS checks for non-salaried trainees only) To be compliant with Ofsted	Consent
Potential applicants who request information but do not apply	Contact (home)	To manage our relationship with you and deliver our services To ensure you receive information you request	Consent
Applicants – who are rejected prior to interview	Contact (home) Socio-demographic Identification number Equal opportunities information Consents Documentary data	To manage our relationship with you and deliver our services To ensure you receive information about your course To provide you with support and guidance To respond to complaints and queries and aim to effectuate these To collect money for services To comply with DfE and Ofsted requirements	Legal basis Consent
Applicants – who are rejected after interview	Contact (home) Socio-demographic Identification number	To manage our relationship with you and deliver our services To provide you with support and guidance	Legal basis Consent

Relationship with CTSN SCITT	What data we collect about you	What we use your data for	Lawful basis
	Equal opportunities information Consents Documentary data	To respond to complaints and queries and aim to effectuate these To comply with DfE and Ofsted requirements	
Applicants who decline the offer / withdraw prior to starting the course	Contact (home) Socio-demographic Identification number Equal opportunities information Consents Documentary data	To manage our relationship with you and deliver our services To ensure you receive information about your course To provide you with support and guidance To respond to complaints and queries and aim to effectuate these To comply with DfE and Ofsted requirements	Contract Legal basis Consent
Trainees cease training prior to completing the course	Contact (home) Contact (work) Socio-demographic Financial Identification number Equal opportunities information Consents Programme assessment and evaluation Documentary data	To manage our relationship with you and deliver our services To ensure you receive information about your course To provide you with support and guidance To respond to complaints and queries and aim to effectuate these To collect money for services To comply with DfE and Ofsted requirements	Contract Legal basis Consent
Partnerships schools	Contact	To provide you with insight and information on the CTSN SCITT To manage our relationship with you and deliver our services	Consent

Categories of personal data

We may collect a number of different categories of personal data from you, which are explained in more detail below:

Types of personal information	Details
Contact (home)	Your contact details (this may include the email, telephone and or mobile number and / or address)
Contact (work)	Your work contact details (this may include the email, phone number and / or address)
Socio-demographic	Information about your age, gender, education level, work, and nationality
Financial	This may include your bank or student loan details or payroll and invoicing information
Contractual and HR	Information on your contract with CTSN SCITT and HR information
Documentary data	Details about you which are stored in a separate format such as evidence of qualifications, CVs, copies of passports and driving licences, DBS forms, references, application forms
Medical records	This may include fitness to work / fitness to study / teach & disability disclosure; health, including any medical conditions and sickness records
Identification number	A number provided to you by the government to identify who you are or a qualification you have obtained such as national insurance number or teacher reference number
Special categories of personal data	Disability, racial or ethnic origin, country of birth, religious or philosophical beliefs, health, and sexual orientation
Consents	Any agreement to use and process your data
Course Information	Dates of training, placement schools, programme assessment and evaluation, monitoring information, attendance and work completed as part of your teacher training including details of marking, feedback and outcome

Types of personal information	Details
Photographs	Digital images

We will only process special categories of personal data where the data subject has given explicit consent to the processing of those personal data for one or more specified purposes as outlined in Article 9 of the GDPR (2018).

Who we share your personal information with

We share parts your data internally within the CTSN SCITT partnership where it is necessary for a specific purpose.

There may be some instances where we share your data with third parties such as programme facilitators and assessors, funding or government bodies such as the Department for Education and Ofsted, our Data processors and any third parties which require us to share your personal data to fulfil our legal obligations such as auditors. We share data for the detection and prevention of crime/fraudulent activity; if there are serious risks to the public, our staff or to other professionals; and to protect a child. Where it is legally required or necessary (and it complies with Data Protection Law) we may share personal information about you with:

- The Department for Education
- Educators and examining bodies eg University of Greenwich or Anglia Ruskin University
- Appropriate Bodies for registering NQTs
- Our regulator Ofsted
- Suppliers and service providers – so they can provide the services we have contracted them for
- Financial organisations – for course/service fees
- Central government
- Professional advisers and consultants – to support the developments and management of CTSN SCITT
- Police forces, courts and tribunals
- Auditors
- Partner schools within the CTSN SCITT partnership
- Potential employers where a reference is asked for – in order to support job applications

We do not export data to countries outside the UK. We do not sell personal information.

Marketing

We may contact you to ask your opinion about our ITE provision, offer insight and research into the education sector and tell you about policy, funding and programmes we think are relevant to you. This is what we mean when we talk about 'marketing'.

The personal information we have for you is made up of what you tell us, data we collect when you use our services, or from third parties we work with. We use this information to decide what may be relevant.

Website

The Big Pink Fish hosted websites, including the CTSN SCITT website, uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them, click [here](#) to view the Big Pink Fish Cookie Policy.

Our website contains links to and from the third-party websites. If you follow a link to any of these websites, please note that they have their own Privacy Policies and that we do not accept any responsibility or liability for these.

How long we keep your personal data

Unless, otherwise stated in our Document Retention Schedule (Appendix A), we keep personal information about you for up to seven years after the completion of the course/ programme / services / employment. We may also keep it longer if this is necessary in order to comply with our legal obligations. We keep your data for one of these reasons:

- To respond to any questions or complaints
- To show that we treated you fairly
- To maintain records according to rules that apply to us
- To provide you with a reference for your work / training with CTSN SCITT

If you make an expression of interest or but do not submit an application, we delete your personal data within 12 months.

How to get a copy of your personal information

You can request details about the personal data we hold on you by filling in a data request form and sending it to our Data Protection Officer at CTSN SCITT, Comberton Village College, West Street, Comberton, Cambridge CB23 7DU. Please note that our staff work term time only so requests cannot be dealt with during school holidays.

You will be required to make a written request with sufficient information to enable us to identify who you are; we will endeavour to deal with the request within one month of receiving the request. If the request is complex or you make a number of requests we may extend the response time by a further two months. We may charge a 'reasonable fee' where a request is manifestly unfounded, excessive or if you request further copies. ICO advises 'reasonable' charges should be £25 per person per hour up to a limited of 18 staff hours.

Please note, we must ensure we know the identity of the requester (or the person the request is made on behalf of), and therefore, we may ask for information to verify your identity. If this is necessary, the timescale for responding begins after we confirm your identity.

You now have the 'right to data portability'. This means that you can obtain and reuse your personal data for your own purposes across different services. We must provide the personal data in a structured, commonly used and machine-readable form, such as CSV files. Machine-readable means that the information is structured so that software can extract specific elements of the data. This enables other organisations to use the data.

Personal information that is exempt

Please note, certain pieces of information are exempt and, therefore, cannot be released. This is a list of some of the reasons:

- Crime and taxation: general
- Crime and taxation: risk assessment
- Functions designed to protect the public
- Regulatory functions relating to legal services, the health service and children's services
- Other regulatory functions
- Journalism, academia, art and literature
- Research and statistics
- Archiving in the public interest
- Health, education and social work data
- Child abuse data
- Management information
- Negotiations with the requester
- Confidential references
- Exam scripts and exam marks
- Protection of the rights of others

More information can be obtained from the ICO: <https://ico.org.uk/>

Letting us know if your personal information is incorrect

You have the right to query the accuracy of any personal data we have about you that you think is incorrect or incomplete. Please contact us if you want to do this. In the event that your personal data changes, please contact us as soon as possible so we can update our records.

What if you want us to stop using your personal information?

As a data subject you have the right to object to our use of your personal data, or to ask us to remove or stop processing it if there is no need for us to do so. This is known as the 'right to object' and 'right to erasure', also known as the 'right to be forgotten'.

We may sometimes be able to restrict the use of your data. This means that we are permitted to store your personal data, but not process it any further.

You can ask us to restrict the use of your personal information in the following circumstances:

- Where you contest the accuracy of the personal data, we will restrict the processing until you have verified the accuracy of the personal data
- Where you object to the processing
- When processing is unlawful, and you oppose erasure and requests restriction instead
- If we no longer need the personal data but you require the data to establish, exercise or defend a legal claim

Please contact us if you want to object to how we use your data or ask us to delete it or restrict how we process it.

How to withdraw your consent

You can withdraw your consent at any time. Please contact us if you want to do so.

This may mean that we cannot provide you with relevant information regarding our products and services.

How to contact us

For further information on how your information is used, how we maintain the security of your information, and your rights to access information we hold on you, please contact our Data Protection Officer:

- by email: scitt@catrust.co.uk
- by telephone: 01223 262503 (extension 223)
- or write to us at: CTSN SCITT, Comberton Village College, West Street, Comberton, Cambridge CB23 7DU

If you have a complaint

If you think your data has been misused or that the organisation holding it has not kept it secure, please contact us to let us know.

If you're unhappy with our response or if you need any advice you should contact the Information Commissioner's Office (ICO). Find out on their website how to report a concern.

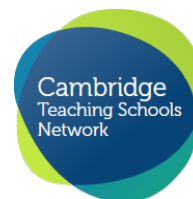
<https://ico.org.uk/concerns/>

Changes to our Data Protection Policy

We keep this Policy under regular review. Please check back frequently to see any updates or changes to our privacy policy.

This Data Protection Policy will be reviewed every two years.

Policy review date: Autumn Term 2022



Appendix A: Document Retention Schedule

Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record	Stored
Trainee files					
General Individual Trainee Files	Yes	Limitation Act 1980	End of course + 6 years Only basic records of students should be kept for longer periods: Name, dates of relationship with institution and final classification.	Secure disposal	OneNote Teams
Supplementary information form including additional information such as religion, medical conditions supplied as part of the application process	Yes		End of course + 6 years	Secure disposal	Teams + secure storage room at either Comberton VC (Secondary) or Histon & Impington Junior School (Primary)
Attendance registers	Yes		Date of register + 6 years	Secure disposal	Teams
Correspondence relating to authorised absence and issues	Yes		Date of absence + 6 years	Secure disposal	Teams

Vetting information (including DBS checks) – successful candidates	Yes	DBS Update Service Employer Guide June 2014 guidelines Keeping Children Safe in Education 2018 (Statutory)	Application forms, references and other documents – for the duration of course + 6 years	Secure disposal	Teams + secure storage room at either Comberton VC (Secondary) or Histon & Impington Junior School (Primary)
Vetting information – Evidence proving the right to work / study in the UK – successful candidate	Yes	An Employer’s Guide to Right to Work Checks (Home Office May 2015)	End of course + 6 years	Secure disposal	Teams + secure storage room at either Comberton VC (Secondary) or Histon & Impington Junior School (Primary)
Sickness monitoring	Yes		Current year + 3 years (if unpaid)	Secure disposal	Teams
Accessibility plans	Yes	Disability Discrimination Act	End of course + 6 years	Secure disposal	Teams
Student Finance applications	Yes		End of course + 6 years	Secure disposal	Teams
Admissions file – application form, interview records, conditions of offer, SKE records, medical check outcomes	Yes		End of course + 6 years	Secure disposal	Teams + secure storage room at either Comberton VC (Secondary) or Histon & Impington Junior School (Primary)
Induction records – address, next of kin, signed code of conduct	Yes		End of course + 6 year	Secure disposal	Teams + secure storage room at either Comberton VC (Secondary) or Histon & Impington Junior School (Primary)

Trainee programme records – initial training plans, summative and interim assessment reports, absence records, job references,	Yes		End of course + 6 years	Secure disposal	Teams + secure storage room at either Comberton VC (Secondary) or Histon & Impington Junior School (Primary)
Self-Evaluation Forms	Yes		End of course + 6 years	Secure disposal	Teams
NQT Registration forms	Yes		End of course + 6 years	Secure disposal	Teams
NQT Assessment Records	Yes		End of course + 6 years	Secure disposal	Teams
NQT: QA visit documentation	Yes		End of course + 6 years	Secure disposal	Teams
Trainee Recruitment					
Successful applicants - application form, ID documents & certificates	Yes	Equality Act 2010	Duration of course + 6 years	Secure disposal	Teams + secure storage room at either Comberton VC (Secondary) or Histon & Impington Junior School (Primary)
Applicants who withdraw / decline offer- application form and if applicable interview record	Yes	Equality Act 2010	End of the recruitment process + 6 years	Secure disposal	Teams + secure storage room at either Comberton VC (Secondary) or Histon & Impington Junior School (Primary)
Successful applicants who subsequently leaves the course - application form,	Yes	Equality Act 2010	End of the academic year + 6 years	Secure disposal	Teams + secure storage room at either Comberton VC (Secondary) or Histon &

interview record ID documents & certificates					Impington Junior School (Primary)
Applicants unsuccessful at interview - application form, interview notes – the evidence why	Yes	Equality Act 2010	End of the recruitment process + 6 years	Secure disposal	Teams + secure storage room at either Comberton VC (Secondary) or Histon & Impington Junior School (Primary)
Prior to 2019/2020: Applicants who are rejected or withdraw prior to interview - if applicable ID documents and certificates	Yes	Equality Act 2010	End of the recruitment process + 6 years	Secure disposal	Teams + secure storage room at either Comberton VC (Secondary) or Histon & Impington Junior School (Primary)
From 2019/20: Applicants who withdraw prior to interview, are rejected prior to interview, are unsuccessful at interview, withdraw or decline offer - if applicable ID documents and certificates	Yes	Equality Act 2010	Within six months	Secure disposal	Teams + secure storage room at either Comberton VC (Secondary) or Histon & Impington Junior School (Primary)
An expression of Interest that does not result in an application	Yes		Within 12 months	Disposal	Teams
Safeguarding					
Forms for proof of ID collected as part of the process of checking	Yes	Keeping Children Safe in Education 2018	Duration of employment / course + 6 years	Secure disposal	Teams + secure storage room at either Comberton VC

'portable' enhanced DBS disclosure		(Statutory Guidance from DfE)			(Secondary) or Histon & Impington Junior School (Primary)
Records relating to any allegation of child protection nature against a trainee or member of staff	Yes	Keeping Children Safe in Education 2018 (Statutory Guidance from DfE) Working together to safeguard children: a guide to interagency working to safeguard and promote the welfare of children 2018	Until the normal retirement age or 10 years from allegation (whichever is longer) Allegations that are found to be malicious should be removed from personnel files	Secure disposal	Teams + secure storage room at either Comberton VC (Secondary) or Histon & Impington Junior School (Primary)
Record of DBS check – Student (Record of check not the certificate itself)	Yes	Keeping Children Safe in Education 2018 (Statutory Guidance from DfE)	Duration of employment / course + 6 years	Secure disposal	Teams + secure storage room at either Comberton VC (Secondary) or Histon & Impington Junior School (Primary)
Emails/Office 365 Files					
Trainee Accounts	Yes	Cyber security essentials	CamTeach emails are disabled following the completion of course & placed in a-30-day "holding state" prior to being archived within Office 365 for 7 years		Office 365
SCITT Employee Accounts	Yes	Cyber security essentials	CamTeach emails are disabled when an employee leaves & placed in a-30-day "holding state" prior to being		Office 365

			archived within Office 365 for 7 years		
Government					
OFSTED reports and papers			Replace former report with new inspection report	Review to see if further retention period required. Secure disposal	
Returns made to central Government			Current year + 6 years	Secure disposal	
Circulars from Department of Education etc			Whilst required operationally	Disposal	
Academic information					
Exam certificates			End of course + 6 years	Secure disposal	Teams + secure storage room at either Comberton VC (Secondary) or Histon & Impington Junior School (Primary)
Assessments			End of course + 6 years	Secure disposal	Teams + secure storage room at either Comberton VC (Secondary) or Histon & Impington Junior School (Primary)
SCITT Management					
Minutes of the senior management meetings and other internal administrative bodies	Yes		Date of meeting + 3 years	Secure disposal Can consider archiving / storing anything important	Teams + The Cam Academy Trust OneDrive

Reports made by the Director or Senior Leadership team	Yes		Date of report + 3 years	Secure disposal Can consider archiving / storing anything important	Teams + The Cam Academy Trust OneDrive
Records made by the Director or Senior Leadership team and other members of staff with administrative responsibilities	Yes		Closure of file + 3 years	Secure disposal Can consider archiving / storing anything important	Teams + The Cam Academy Trust OneDrive
Development plans	No		Closure of file + 3 years	Review for further retention. Secure disposal	Teams + The Cam Academy Trust OneDrive
General items					
General file series			Current year + 6 years	Review to see if further retention period required. Disposal	Teams + The Cam Academy Trust OneDrive
Documents and Policies			7 years	Review to see if further retention period required. Disposal	Teams + The Cam Academy Trust OneDrive
SCITT brochure or prospectus			Current year + 3 years	Review to see if further retention period required. Disposal	Teams + The Cam Academy Trust OneDrive arc
Internal moderation			Current year + 3 year	Review to see if further retention period required. Disposal	Teams + The Cam Academy Trust OneDrive

External moderation			Current year + 3 year	Review to see if further retention period required. Disposal	Teams + The Cam Academy Trust OneDrive
Evaluation surveys	Yes / No		Current year + 3 year	Review to see if further retention period required. Disposal	Teams + The Cam Academy Trust OneDrive
NQT surveys	Yes / No		Completion + 3 years	Secure Disposal	Teams + The Cam Academy Trust OneDrive
RQT surveys	Yes / No		Completion + 3 years	Secure Disposal	Teams + The Cam Academy Trust OneDrive
Newsletters			Current year + 1 year	Review to see if further retention period required. Disposal	Teams + The Cam Academy Trust OneDrive
Finance					
Bursary trainees bank details	Yes		End of course + 6 years	Secure disposal	Teams + CaTrust OneDrive
Student Finance	Yes		End of course + 6 years	Secure disposal	Teams + The Cam Academy Trust OneDrive
Annual accounts		Financial Regulations	Current year + 6 years	Secure disposal	CAM Academy Trust Finance Archives
Loans and grants		Financial Regulations	Date of last payment on loan + 12 years	Secure disposal	CAM Academy Trust Finance Archives
Budget reports, budget monitoring etc.			Current year + 6 years	Secure disposal	CAM Academy Trust Finance Archives

Invoice, receipts and other records covered by the Financial Regulations		Financial Regulations	Current year + 6 years	Secure disposal	CAM Academy Trust Finance Archives
Annual budget and background papers			Current year + 6 years	Secure disposal	CAM Academy Trust Finance Archives
Order books and requisitions			Current year + 6 years	Secure disposal	CAM Academy Trust Finance Archives
Records relating to the identification and collection of debt		Limitations Act	Current year + 6 years	Secure disposal	CAM Academy Trust Finance Archives
SCITT fund - Cheque books			Current year + 3 years	Secure disposal	CAM Academy Trust Finance Archives
SCITT fund - Paying in books			Current year + 6 years	Secure disposal	CAM Academy Trust Finance Archives
All records relating to the management of contracts under signature		Limitation Act 1980	Last payment on the contract + 6 years	Secure disposal	CAM Academy Trust Finance Archives
Records relating to the monitoring of contracts		Limitation Act 1980	Life of contract + 6 years	Secure disposal	CAM Academy Trust Finance Archives