

Privacy Notice and Data Retention Schedule for Trainee Teachers

Under data protection law, individuals have a right to be informed about how Services For Education (SFE) uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data. SFE's overarching Privacy Notice is available to view on the website:

<https://www.servicesforeducation.co.uk/privacy-notice/>

This privacy notice explains more specifically how we have collected and processed personal data about individuals who have commenced or completed a teacher training programme provided by SFE SCITT. It includes information about retention and disposal of data after the closure of the SCITT (August 2022).

Services For Education is the "data controller" for the purposes of data protection law. If you have any questions about this privacy notice or require further information, please contact:

Data Protection Officer
Services For Education
Unit 3, Holt Court
Holt Street
Birmingham Science Park Aston
Birmingham
B7 4AX

Email: dpo@servicesforeducation.co.uk

Telephone: 0121 366 9950

The lawful basis for obtaining and using personal data

Under the UK General Data Protection Regulation (UK GDPR) SFE only collects and processes personal data where we have lawful base to do so. In the case of the SCITT this is namely to:

- fulfil a contract with an individual, or where an individual has asked SFE to take specific steps before entering into a contract
- to comply with a legal obligation
- to perform a task in the public interest

Less commonly, we may also use personal information about an individual where:

- the individual has given their consent to use it in a certain way or for a specific purpose
- to protect the vital interests of the individual
- for the legitimate interests of SFE, provided the individuals' rights and freedoms are not overridden e.g. where disciplinary or allegations have been made

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.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify SFE's SCITT use of your data.

The personal data we hold

SFE uses the information you provide during the application/registration process and may supplement this with information provided thereafter.

Most of the information we collect from you is mandatory and it is our 'legal obligation' to do so, for example, for safeguarding reasons. Whenever we seek to collect information from you, we 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. Where the data is not part of official requirements, we will ask for your consent before we collect that data.

The personal data that we may collect, store, use and share (when appropriate) about you includes, but is not restricted to:

- personal identifiers i.e. full name, title/pronouns, date of birth, gender, marital status, ethnicity
- contact details i.e. postal address, email address and contact number(s)
- marriage certificate or change of name documentation (where relevant)
- proof of identification documents e.g. copy of passport, full UK birth certificate, driving license
- proof of relevant visa/right to work in the UK details as required
- recruitment information, references and other information included in the UCAS or DfE online application forms as part of the application process
- qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- emergency/next of kin contact details and contact preferences
- characteristics, such as special educational needs
- details of any medical conditions or disability
- attendance/absence information
- safeguarding information
- performance information
- outcomes of any disciplinary and/or grievance procedures
- details of any support received
- photographs and video recording
- bank account details

How we use this data

The purpose of processing this data is to help SFE run the SCITT and deliver the training programme, including to:

- enable you to receive funding from the DfE (where relevant) and/or pay for the training through private funds
- facilitate safer recruitment, as part of our safeguarding obligations towards pupils
- support effective progression towards Qualified Teacher Status through progress reviews
- inform our recruitment and retention policies
- allow better financial modelling and planning
- enable equalities monitoring
- improve the management of workforce data across the sector (e.g. Teacher Supply)

Security of your personal data

SFE has in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information confidential and as secure as possible whether those are electronic files or in paper-format.

We create and maintain a file for each trainee who commenced a teacher training programme through the SFE SCITT. All information contained in this file is kept secure and is only used for purposes directly relevant to your progression on the course. Access to this information is strictly controlled and limited to authorised personnel only.

Information will be stored only for as long as it is needed or required by statute. Once you complete your training (or withdraw from a programme), SFE will retain your file and appropriately delete, dispose and/or or destroy the information in it in accordance with the agreed data retention schedule. Further details about the retention schedule for SCITT data can be found at the end of this document.

We undertake to report any personal data breaches in accordance with the General Data Protection Regulation requirements.

Where we transfer data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and complies with data protection law), we may share personal information about you with:

- the Department for Education
- your family or representatives
- our regulator, Ofsted
- schools/settings with whom you are on placement or working as part of the training programme
- suppliers and service providers – to enable them to provide the service we have contracted them for, such as the delivery of the PGCE (Post-Graduate Certificate of Education)
- financial organisations
- our auditors
- health authorities
- health and social welfare organisations
- professional advisers and consultants
- police forces, courts, tribunals
- professional bodies
- employment and recruitment agencies

While we will not share with, give or sell your details to other organisations for their own marketing purposes, we may send marketing materials on their behalf to you with your consent. We will only send information on behalf of organisations where we believe it will be relevant and of interest to our trainees.

Your rights to your personal information

If you wish to update your personal data or contact preferences, please contact us by telephone on 0121 366 9950 or email hello@servicesforeducation.co.uk

Under data protection legislation, you have the right to request access to information about you that the SFE SCITT holds and to have any inaccuracies in this data corrected. Please email our Data Protection Officer: dpo@servicesforeducation.co.uk if you would like to exercise this right.

You also have the right to:

- request the deletion or removal of personal data where there is no compelling reason for its continued processing
- restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- object to the use of your personal data for direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not be subject to decisions being taken by automated means (by a computer or machine, rather than by a person)

Please contact our Data Protection Officer: dpo@servicesforeducation.co.uk if you would like to exercise any of these rights.

Your right to lodge a complaint

SFE takes any concerns or 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 concerns about our data processing, please raise this with us in the first instance by contacting our Data Protection Officer: dpo@servicesforeducation.co.uk

If you have concerns with the way in which your personal data has been processed, and we have been unable to rectify it, you may complain directly to the Information Commissioner's Officer. Further information can be found on the [ICO website](#).

Changes to this privacy notice

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time.

This privacy notice was last reviewed on 17th August 2022 and will be reviewed on a regular basis or to reflect updates in legislation, as appropriate.

Document Retention And Disposal Schedule: Initial Teacher Training Programme

Initial Trainee Teachers

This schedule lists the principal documents held on file for trainee teachers, who have commenced a training programme offered directly by SFE SCITT. The list is not exhaustive, and other documents relating to training may be also held. Individual trainee's files, whether electronic and/or in paper-format, will be held for the length of training plus 6 years at which time they will be securely disposed of, deleted and/or destroyed (i.e. shredded) as appropriate. Documents relating to child protection or accidents at work may be held for a period of up to 25 years, in accordance with the DFE "Data protection: a toolkit for schools" and the trainee will be advised of this.

1. Recruitment: Application Process

	Record/Document Category	Guideline Retention Period	Action at end of the administrative life of the record
1.1	Application forms and interview notes for unsuccessful candidates	6 months from date notified of decision that not accepted onto the programme.	Secure disposal
1.2	Original application forms for successful candidate	During training and up to 6 years from date of completion or withdrawal from the programme.	

2. Recruitment: Appointment Process

	Record/Document Category	Guideline Retention Period	Action at end of the administrative life of the record
2.1	Confirmation of pre-training medical check clearance	During training and up to 6 years from date of completion or withdrawal from the programme.	Secure disposal
2.2	DBS Checks/Certificates	No requirement to retain copies of DBS certificates or proof of identity documents.	

		If retained, maximum period six months and if, in very exceptional circumstances, it is considered necessary to retain a copy of the original certificate for longer than six months, consent should be sought from the applicant and retained on file.	
2.3	Proof of identity collected as part of the process of checking “portable” enhanced DBS disclosure	No requirement to retain copies of proof of identity but should be checked and a note kept of what was seen and what was checked. If for any reason it is felt necessary to keep copy documentation then this should be placed on the trainee’s personal file.	
2.4	Confirmation of DBS outcome and any associated docs (e.g. risk assessment or certificate of good conduct)	During training and up to 25 years from date of completion or withdrawal from the programme. <i>As recommended</i> within the DFE guidance, ‘Data Protection: a toolkit for schools’ , April 2018.	Secure disposal
2.5	Barred list clearance	During training and up to 25 years from date of completion or withdrawal from the programme. <i>As recommended</i> within the DFE guidance, ‘Data Protection: a toolkit for schools’ , April 2018.	Secure disposal
2.6	Prohibition check	During training and up to 25 years from date of completion or withdrawal from the programme. <i>As recommended</i> within the DFE guidance, ‘Data Protection: a toolkit for schools’ , April 2018.	Secure disposal

2.7	Evidence proving the right to study/work in the UK	Date of completion/withdrawal + 2 years <i>As recommended</i> within Home Office ' An Employers Guide to Right to Work Checks ', April 2022	Secure disposal
2.8	Copies of qualifications certificates relevant to training programme	During training and up to 6 years from date of completion or withdrawal from the programme.	
2.9	Satisfactory completion of skills tests (prior to April 2020).	During training and up to 6 years from date of completion or withdrawal from the programme.	
2.10	Satisfactory completion of assurance tasks for Fundamental Skills in English and maths (after April 2020).	During training and up to 6 years from date of completion or withdrawal from the programme.	
2.11	Two original references (and/or any additional references provided to support the trainee's application)	During training and up to 6 years from date of completion or withdrawal from the programme.	
2.12	Copy of letters of successful appointment to the training programme	During training and up to 6 years from date of completion or withdrawal from the programme.	Secure disposal
2.13	Copies of signed trainee Partnership Agreements and Code of Conduct.	During training and up to 6 years from date of completion or withdrawal from the programme.	Secure disposal
3. Trainee Management			
	Record/Document Category	Guideline Retention Period	Action at end of the administrative life of the record
3.1	Trainee personal file	During training and up to 6 years from date of completion or withdrawal from the programme.	Secure disposal
3.2	Performance information relating to a trainee's progression on the course and information on final	During training and up to 6 years from date of completion or withdrawal from the programme.	Secure disposal

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	outcomes to support the provision of references, if required.		
3.3	Formal disciplinary warnings – child protection related	During training and up to 25 years from date of completion or withdrawal from the programme. <i>As recommended</i> within the DFE guidance, ' Data Protection: a toolkit for schools ', April 2018.	Secure disposal
3.4	Formal disciplinary warnings – not child protection related	During training and up to 6 years from date of completion or withdrawal from the programme.	
3.5	Medical certificates/occupational health reports and sickness absence record	During training and up to 6 years from date of completion or withdrawal from the programme	Secure disposal
3.6	Trainee absence records, self-certificates	During training and up to 6 years from date of completion or withdrawal from the programme	Secure disposal
3.7	Notification of wish to withdraw from the course and SFE SCITTs written acknowledgement of this, or other documentation relating to the termination of training.	6 years from date of completion or withdrawal from the programme	Secure disposal
3.8	Log of any meetings relating to withdrawal or deferral	6 years from date of completion or withdrawal from the programme	Secure disposal