

ABOUT THIS DOCUMENT

Bourton Meadow Initial Teacher Training Centre is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR). It applies to all employees, workers and contractors, but does not form part of any contract of employment or other contract to provide services.

Bourton Meadow Initial Teacher Training Centre (BMITTC) operating within the Campfire Education Trust is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. We may amend this notice at any time.

Data protection principles

We will comply with data protection law and our GDPR Principles are:

- Data is processed fairly and lawfully
- Data is processed only for specified and lawful purposes
- Processed data is adequate, relevant and not excessive
- Processed data is accurate and, where necessary, kept up to date
- Data is not kept longer than necessary
- Data is processed in accordance with an individual's consent and rights
- Data is kept secure
- Data is not transferred to countries outside of the European Economic Area ('EEA') without adequate protection

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection. These are data about ethnic origin, political opinions, religious or similar beliefs, trade union membership, health, sex life, criminal proceedings or convictions, genetic or biometric data.

Prospective candidates who show an initial interest in the course:

This includes, but is not limited to, individuals who contact BMITTC or one of its lead schools via email, website, or telephone to request information about the course; individuals who attend a recruitment event or open evening at BMITTC or a lead school and/or register an interest in the training programme at other 'Train to Teach' events held by the DfE and other organisations.

The data we hold may include (but is not restricted to):

- Name
- Contact details (email, phone number)
- Previous work experience
- Current employer (if appropriate)

Why this data is held:

We hold this data so that we can:

- provide you with further details and updates about the course(s) in which you showed an interest
- notify you when the UCAS application process opens
- inform you of any upcoming recruitment events and/or open evenings

How the data is stored:

This data is stored electronically on a secure network and can only be viewed and/or processed by key members of staff from the ITT provider and/or lead school. It is not shared with any third party outside of Bourton Meadow ITTC, and its lead schools. The data is deleted 12 months after the start date of the course in which you showed an interest.

Applicants

This includes individuals from whom we receive an application to one of our courses via UCAS Teaching Training.

Through your completion of the UCAS application form and attendance at one of our selection days, we collect the following data:

- Personal contact details such as name, title, addresses, telephone numbers, and email address
- Date of birth
- Gender
- Marital status
- National Insurance number
- Location of employment or workplace
- Work history
- Academic qualifications (copies taken at a selection day)
- Your personal statement
- References
- Copy of photographic ID (driving licence/passport)
- Copy of marriage certificate or change of name documentation (if appropriate)

Why the data is held:

The data is collected by BMITTC and/or its lead schools in order to process your application and/or secure a suitable school placement for the course(s) you've applied to.

How the data is stored and shared:

This data is collected both electronically and in paper format and stored securely – either on a secure network or locked in a filing cabinet.

If applying for a salaried placement, your UCAS application form is routinely shared with a prospective employer e.g headteacher. If applying for a tuition fee place, your application is not routinely shared with headteachers but may be made available on request.

If your application is not successful, your data will be securely destroyed 6 months after the commencement date of the course to which you applied.

Trainees (and candidates who accept a conditional offer)

In addition to the data listed above, which we collect during the initial application stage, we will also collect, store, and use the following categories of personal information about you:

- Work (placement) email addresses
- Emergency contact details of next of kin
- Unique teacher reference number
- Bank account details (for trainees eligible for a training bursary)
- Location of employment or workplace.
- Employment records (NQTs and RQTs)
- Performance information
- Disciplinary and grievance information
- CCTV footage
- Information about your use of our information and communications systems
- Copies of invoices sent to you and payment details (where appropriate)
- Details of any SLC payments received in respect of your fees
- Photographs/video (with specific written consent)

We will also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions
- Information about your health, including any medical condition, disability, health and sickness/attendance records
- Information about criminal convictions and offences
- For salaried trainees: Written confirmation from employers of salary, right to work in the UK, Enhanced DBS, prohibition check, fit to teach assessment and disqualification by association (prior to September 2018)
- For tuition fee trainees: Enhanced DBS, prohibition check, fit to teach assessment and disqualification by association (prior to September 2018)

How is your personal information collected?

We collect personal information about trainees through the application and recruitment process, directly from candidate or, very occasionally, from a current or prospective employer. We may sometimes collect additional information from third parties including former employers, universities and colleges and/or previous ITT providers.

We may collect additional personal information in the course of job-related or training-related activities throughout the period of you working for us or training with us, including the first five years of your teaching.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract (partnership agreement) we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
4. Where we need to protect your interests (or someone else's interests).
5. Where it is needed in the public interest or for official purposes.

The first two reasons above are most likely and include the following examples (although this list is not exhaustive):

- secure suitable school placements
- comply with the law regarding data sharing
- register trainees on the database of trainee teachers and providers (DTTP)
- make payments (training bursaries / SLC loans etc)
- support registration with the HEI providing the PGCE
- support trainees' progress towards the Teachers' Standards
- monitor and report on trainees' progress
- provide appropriate pastoral care
- safeguard the safety and wellbeing of trainees and pupils
- evaluate the quality of training and support being provided
- ensure a smooth transition into the NQT year
- support progress through the NQT induction and early stages of a teacher's career
- provide information on courses and other CPD opportunities to support career development
- provide references on request

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you, training you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers, including trainees).

Personnel from partnership schools

In order to deliver the teacher training programme and meet the terms of our contract, we are required to work in close collaboration with colleagues in our partnership schools.

To enable us to do this, we collect the following information from Headteachers:

- Contact details (name, position in school, email address and contact telephone number) of key personnel including the Headteacher, school-based mentors, teacher tutors, school's DPO, and bursar (or other colleague responsible for financial arrangements).
- Performance data relating to the teacher tutor (e.g quality of teaching over time, competency against key skills relating to their mentoring role)

Further data is collected on the quality of support and guidance being provided by the teacher tutor and /or other personnel from partnership schools through a wide range of quality assurance activities (fortnightly visits, joint observations of the trainee, placement evaluations etc)

This data is stored securely and in accordance with the law, both electronically and in paper form and is retained for 12 months after completion of the course, for auditing purposes. It is only viewed by course leaders and is not shared with any third party.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If

we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Consent

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Data sharing

We may have to share your data with third parties, including third-party service providers, where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. We require third parties to respect the security of your data and to treat it in accordance with the law.

We routinely share trainee data with:

- Partnership schools
- Venues of core training sessions
- The Department for Education (DfE)
- The Teaching Regulation Agency (TRA)
- Schools within the Campfire Education Trust
- OfSTED
- UCAS
- The Higher Educational Institute providing the PGCE course
- ITT Steering Group
- Financial auditors

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Transferring information outside the EU

We may transfer the personal information we collect about you to certain countries outside the EU, in order to perform our contract with you: [E.G. Microsoft 365 *One Drive*]. We will ensure that your personal information receives an adequate level of protection and is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection.

Security

We have appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to

know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

Campfire Education Trust has put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

When deciding an appropriate retention period, we refer to the IRMS (Information and Record Management for Schools).

Rights of access, correction, erasure, and restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request").
- Request correction of the personal information that we hold about you.
- Request erasure of your personal information.
- Object to processing of your personal information.
- Request the restriction of processing of your personal information.
- Request the transfer of your personal information to another party.

Contact

For further information about your rights, or if you have any questions about this privacy notice or how we handle your personal information, please contact Helen Byrom, Head of Training (hbyrom@bourtonmeadow.co.uk).

The Data Protection Officer for the Campfire Education Trust is Tracey Riches (tracey.riches@clear7.co.uk). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.gov.uk or telephone 01625 5457453)