

Privacy notice and data retention schedule for Trainee Teachers

Under data protection law, individuals have a right to be informed about how the teacher training centre 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.

This privacy notice explains how we collect, store and use personal data about individuals who have commenced a teacher training programme through Bourton Meadow Initial Teacher Training Centre and/or the lead school (Bourton Meadow Academy). (Trainees who applied to a course offered by another lead school, such as Bedgrove Infant School, should refer to the relevant privacy notices for that organisation.)

We, Campfire Education Trust, are the 'data controller' for the purposes of data protection law. Our data protection officer is Tracey Riches. Please make contact via email in the first instance (see 'Contact us' below).

The personal data we hold

We process data relating to those who commence a teacher training programme provided by Bourton Meadow Initial Teacher Training Centre and its lead school (Bourton Meadow Academy). Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Date of birth, marital status and gender
- Marriage certificate or change of name documentation (where relevant)
- Next of kin and emergency contact numbers
- Salary (where relevant)
- Bank account details
- 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
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving license and passport
- Photographs

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity
- Health, including any medical conditions, and sickness records

Why we use this data

The purpose of processing this data is to help us run the teacher training centre 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)

Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

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

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)
- We have legitimate interests in processing the data – for example, where:
 - o 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 the teacher training centre's (and the Campfire Education Trust's) use of your data.

Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

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.

How we store this data

Personal data is stored in line with our data retention schedule, which can be found at the end of this document.

We create and maintain a file for each trainee (who commenced a teacher training course through Bourton Meadow Academy or Bourton Meadow Initial Teacher Training Centre). The information contained in this file is kept secure and is only used for purposes directly relevant to your progression on the course.

Once you complete your training (or withdraw from a programme), we will retain this file and delete the information in it in accordance with the data retention schedule below.

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 it complies with data protection law), we may share personal information about you with:

- The Department for Education
- Your family or representatives

- Our regulator, Ofsted
- 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

Transferring data internationally

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

Your rights

How to access personal information we hold about you

Individuals have a right to make a ‘**subject access request**’ to gain access to personal information that the teacher training centre (or the Campfire Education Trust) holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our data protection officer.

Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

Complaints

We take any 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 concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer via email dpo@campfiretrust.co.uk

This notice is based on the [Department for Education's model privacy notice](#) for the school workforce, amended for trainee teachers and to reflect the way we use data in the teacher training centre.

Document Retention Schedule for Trainee Teachers

Trainee Teachers		
<p>This schedule lists the principal documents held on file for trainee teachers, who have commenced a training programme offered directly by Bourton Meadow Initial Teacher Training Centre or the lead school (Bourton Meadow Academy). The list is not exhaustive, and other documents relating to training may be also held. Personnel files will be held for the length of training + 6 years at which time they will be securely shredded. 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.</p>		
Application process		
Application forms and interview notes (for unsuccessful candidates)	Special categories of personal data	Date of course start date + 6 months
Original job application form for successful candidate	Special categories of personal data	Date of completion/withdrawal + 6 years
Appointment process		
Confirmation of pre-training medical check clearance	Special categories of personal data	Date of completion/withdrawal + 6 years
DBS certificates/copies	Special categories of personal data	<p>No requirement to retain</p> <p>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.</p>
Confirmation of DBS outcome and any associated docs (e.g. risk assessment or certificate of good conduct)	Special categories of personal data	<p>Date of completion/withdrawal + 25 years</p> <p><i>As recommended</i> within the DFE guidance, ‘Data Protection: a toolkit for schools’, April 2018</p>

Barred list clearance	Special categories of personal data	Date of completion/withdrawal + 25 years <i>As recommended</i> within the DFE guidance, ' Data Protection: a toolkit for schools ', April 2018
Prohibition check	Special categories of personal data	Date of completion/withdrawal + 25 years <i>As recommended</i> within the DFE guidance, ' Data Protection: a toolkit for schools ', April 2018
Copies of documents used for identity authentication for DBS and Asylum and Immigration Act purposes	Special categories of personal data	Date of completion/withdrawal + 2 years <i>As recommended</i> within Home Office ' An Employers Guide to Right to Work Checks ', August 2017
UK Border Agency Documentation (Work permit)	Special categories of personal data	Date of completion/withdrawal + 2 years <i>As recommended</i> within Home Office ' An Employers Guide to Right to Work Checks ', August 2017
Records relating to trainees from outside of the UK e.g. visa, work permits, etc.	Special categories of personal data	Date of completion/withdrawal + 2 years <i>As recommended</i> within Home Office ' An Employers Guide to Right to Work Checks ', August 2017
Copies of qualifications certificates relevant to employment	Personal data	Date of completion/withdrawal + 6 years <i>As recommended by the trust HR provider</i>

Satisfactory completion of skills tests (prior to April 2020).	Personal data	Date of completion/withdrawal + 6 years <i>As recommended by the trust HR provider</i>
Satisfactory completion of assurance tasks for Fundamental Skills in English and maths (after April 2020).	Personal data	Date of completion/withdrawal + 6 years <i>As recommended by the trust HR provider</i>
Two original references (and/or any additional references provided to support the appointment)	Personal data	Date of completion/withdrawal + 6 years <i>As recommended by the trust HR provider</i>
Copy of letters of successful appointment to the course (held in electronic files).	Personal data	Date of completion/withdrawal + 6 years
Copies of signed trainee Partnership Agreements and Code of Conduct.	Personal data	Date of completion/withdrawal + 6 years
Sickness and maternity information		
Medical certificates/ Occupational Health reports and sickness absence record	Personal data	Date of completion/withdrawal+ 6 years <i>As recommended by the trust HR provider</i>
Trainee absence records, certificates, self-certificates	Special categories of personal data	Date of completion/withdrawal+ 6 years <i>As recommended by the trust HR provider</i>
Disciplinary Records		
Formal disciplinary warnings – child protection related	Personal data	Date of completion/withdrawal + 25 years <i>As recommended within the DFE guidance, ‘Data Protection: a toolkit for schools’, April 2018</i>
Formal disciplinary warnings – not child protection related	Personal data	Date of completion/withdrawal + 6 years <i>As recommended by the trust HR provider</i>

Leavers information		
Notification of wish to withdraw from the course and BMITTC's written acknowledgement of this, or other documentation relating to the termination of training.	Personal data	Date of completion/withdrawal + 6 years
Log of any meetings relating to a withdrawal or deferral.	Personal data	Date of completion/withdrawal + 6 years
Additional employee information		
Performance information relating to a trainee's progression on the course and information on final outcomes to support the provision of references, if required.	Personal data	Date of completion/withdrawal + 6 years <i>As recommended by the trust HR provider</i>
Evidence of training – where the training relates to children e.g. safeguarding or other child related training	N/A	Date of the training + 40 years
Trainee media consent forms	N/A	Date of completion/withdrawal + 6 years (Social media accounts will be closed in August 2022)