South Farnham Educational Trust

The Continual Pursuit of Excellence

PRIVACY NOTICE FOR SURREY SOUTH FARNHAM SCITT

REVIEW DATE:	SUMMER 2025
NEXT REVIEW DATE:	SUMMER 2027

Name of data controller: South Farnham Educational Trust
Name of the Trust data protection officer: Data Protection Education Ltd
Name of the SSF SCITT data protection lead: Claire Harnden

Surrey South Farnham SCITT (SSF) 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.

SSF 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. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

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).

- We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Date of birth
- Gender
- Ethnicity
- Domicile
- Bank account details, payroll records and tax status information (Salaried trainees as applicable and tuition fee bursaries)
- Salary information (if applicable)
- Start and end dates
- Location of employment or workplace
- Copy of driving licence/Passport/Identity documents
- Recruitment information (including copies of right to work documentation, references and other information included in the UCAS form as part of the application process)
- Employment records as recorded on the UCAS application (including job titles, work history, working hours, training records and professional memberships)
- Performance information
- Disciplinary, grievance and cause for concern information
- CCTV footage and other information obtained through electronic means such as swipe-card records (when on site at an SFET school or SSF training centre)
- Information about your use of our information and communications systems
- Photographs
- Fitness to Train (see policy)
- DBS clearance

How is your personal information collected?

We collect personal information about trainees through the application and recruitment process, either directly from candidates, UCAS applications (including references), background check providers (DBS and Fitness to Train).

In line with the statutory guidance document Keeping Children Safe in Education (2022) the SCITT will conduct online searches for any candidates who accept an invitation to interview.

The purpose of the online search is to uncover any information that may suggest the candidate is:

- a potential safeguarding risk
- their appointment may damage the reputation of the school or;
- they are unqualified for the role they have applied for

We will collect additional information in the course of training-related activities throughout the period of you training with us.

Other third parties

We will also share your data with certain third parties to fulfil legal requirements, obtain or provide necessary information or because the third party processes data on our behalf. These third parties include:

- Your previous employers in order to undertake pre-employment checks (UCAS references)
- The Disclosure and Barring Service in order to undertake pre-employment checks and follow-up checks during employment
- Suppliers and consultants that provide us with a service, such as occupational health or legal services
- Trade unions or any other representative acting on your behalf
- Ofsted
- Auditors
- Central and local government
- Professional advisers and consultants
- Professional bodies
- Police forces, courts, tribunals

When we appoint third parties to process data on our behalf, the third party is also required to process the data lawfully and fairly and in a manner that ensures appropriate security of the data, using appropriate technical or organisational measures to protect against unauthorised or unlawful processing and accidental loss.

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 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

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests)
2. Where it is needed in the public interest or for official purposes

Why we collect and use this information

We use data to manage the day-to-day operation of the SCITT. In particular it is used to:

- manage recruitment processes and respond to reference requests
- inform recruitment and placement into a school
- registration (PGCE/DfE) and recommendation for QTS (DfE)
- monitor protected characteristics in order to promote equality at work

- keep records of trainee performance and work/placement history to ensure acceptable standards of conduct are maintained and to manage training and progression
- manage absence effectively, including obtaining advice from occupational health providers about health conditions to ensure compliance with employment and health and safety law (Fitness to Train)
- defend legal claims
- enable individuals to be paid (bursaries)

The lawful basis on which we process this information

We process this information because the processing is necessary for us to enter into a training contract with you and for the subsequent performance of that contract. We also need to process this information to ensure that we are complying with our legal obligations, such as ensuring that you have the right to work in the UK, and/or to carry out a task in the public interest.

We process special category data, such as information about your ethnic origin or health, as part of our equal opportunities monitoring process and in order to meet legal obligations (such as the requirement to make reasonable adjustments for employees with a disability). This information is collected with the express consent of trainees. Consent may be withdrawn by a trainee at any time.
If we wish to process your personal data for a new purpose we will inform you of any additional processing.

Collecting this information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

Storing this information

We hold trainee data securely in your trainee file, in electronic records within our secure IT system, including email.

In summary we retain most records relating to your training on your trainee file for seven years after your training has ended.

Identity documents obtained for the purposes of undertaking a Disclosure and Barring Service check are only retained until the results of the check have been received.
We do not transfer your data to countries outside the European Economic Area.

Department for Education data collection requirements

The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005.

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to https://www.gov.uk/education/data-collection-and-censuses-for-schools.

The department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal 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 data requested; and
- the arrangements in place to securely store and handle the data

To be granted access to school workforce information, organisations must comply with its 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 department's data sharing process, please visit:
https://www.gov.uk/data-protection-how-we-collect-and-share-research-data
To contact the department: https://www.gov.uk/contact-dfe

Requesting access to your personal data and your rights as a data subject

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact your school data protection lead, see 'contact us' below.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of data protection legislation

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with your school data protection lead or Trust data protection officer in the first instance. Alternatively, you can contact the Information Commissioner's Office at https://ico.org.uk/concerns/

Further information

If you would like to discuss anything in this privacy notice, please contact the SCITT data protection lead or the Trust data protection officer
Data Protection Officer dpo@dataprotection.education
Data Protection Lead gdpr.ssfscitt@sfet.org.uk