



## **Appendix A: Data Protection Supplement for Initial Teacher Training (ITT)**

### ***Vantage North Humber Teacher Training (VNHTT)***

#### **A1. Purpose, Scope and Target Audience**

This Appendix sets out how the Trust's Data Protection Policy applies to Initial Teacher Training (ITT) provision delivered through Vantage North Humber Teacher Training (VNHTT).

For the purposes of VNHTT, the scope of the Data Protection Policy explicitly includes ITT trainees as a distinct category of data subject, in addition to pupils, workforce, parents, and others.

Accordingly, where the main policy refers to its application to:

"Pupils, workforce, parents and others"

this shall, for VNHTT provision, be read as including:

"All employees, ITT trainees, applicants to ITT programmes, and individuals engaged in or supporting Initial Teacher Training provision."

This ensures that trainees are clearly recognised within the Trust's data protection framework, in line with sector best practice for accredited ITT providers.

This Appendix forms an integral part of the Trust's Data Protection Policy and must be read alongside it. It does not replace or dilute the main policy but provides clarification and additional requirements specific to ITT provision.

#### **A2. Definition and Status of ITT Trainees**

For the purposes of data protection, individuals undertaking ITT through VNHTT are referred to as "ITT trainees."

This designation reflects the dual status of trainees, who:

- Are students, in respect of academic study, training, assessment, and qualification; and
- Act in a staff-like professional capacity during school-based placements, where they are subject to safeguarding duties, professional standards, and workplace policies.

Personal data relating to ITT trainees will be processed lawfully under appropriate legal bases, including public task, legal obligation, contract, legitimate interests, or consent, as set out in the main policy.



### **A3. Governance and Accountability for Data Protection (VNHTT)**

The Trust's Data Protection Officer (DPO) retains overall responsibility for ensuring compliance with data protection legislation and Trust policy, including ITT provision.

In recognition of the operational complexity of SCITT delivery, the Trust appoints a VNHTT Chief Privacy Officer (CPO) operating under the authority of the DPO.

The VNHTT CPO is responsible for:

- Day-to-day data protection oversight within VNHTT provision.
- Coordinating ITT-specific data protection training for staff, mentors, and trainees.
- Acting as the first point of contact for ITT-related Subject Access Requests (SARs);
- Monitoring local compliance with Trust policies and procedures; and
- Escalating issues to the Trust DPO where necessary.

This arrangement ensures clear establishment-level accountability while maintaining Trust-wide governance and consistency.

### **A4. Categories of Personal Data Processed in ITT Provision**

In addition to the categories of personal data processed across the Trust, VNHTT may process ITT-specific personal data including:

- Application, recruitment, and selection information.
- Training records, assessments, and progress reviews.
- Placement information, mentor feedback, and professional conduct records.
- Safeguarding information where relevant.
- Equality monitoring data (where lawfully collected); and
- Post-programme destination, employment, and retention data for quality assurance and benchmarking.

Data collection will be proportionate, necessary, and transparent.

### **A5. Special Category Data and Appropriate Policy Document (APD)**

VNHTT necessarily processes special category personal data and criminal offence data in connection with ITT provision. This includes, but is not limited to:



- Fitness to teach health information.
- Equality and diversity monitoring data.
- Safeguarding-related information; and
- Disclosure and Barring Service (DBS) information.

In accordance with Schedule 1 of the Data Protection Act 2018, this Appendix functions as the Appropriate Policy Document (APD) for VNHTT provision, setting out:

- The lawful bases for processing such data (including employment, safeguarding, and substantial public interest)
- The safeguards applied to protect data subjects' rights and freedoms; and
- Retention and review arrangements specific to ITT records.

Special category data will only be processed where strictly necessary and with appropriate technical and organisational measures in place.

#### **A6. Data Sharing within ITT Partnerships**

As a school-based ITT partnership, VNHTT requires the lawful and proportionate sharing of trainee data with a range of partners, including:

- Partnership and placement schools.
- Mentors and Professional Tutors.
- External moderators, assessors, and awarding bodies; and
- The Department for Education and other authorised regulatory bodies.

Data sharing will be limited to what is necessary for training, safeguarding, assessment, quality assurance, and accreditation purposes, and will be supported by appropriate agreements where required.

#### **A6. Sharing with Future Employers**

In line with NASBTT guidance and sector practice, VNHTT recognises the importance of supporting trainees' transition into employment.

Accordingly:

- Explicit consent will be sought from trainees to share final assessment outcomes and professional reports with prospective employers for the purpose of supporting induction and early professional development.
- Such consent will be freely given, recorded, and capable of being withdrawn.



## **A7. ITT Trainees as Data Subjects and Data Processors**

ITT trainees occupy a dual role within VNHTT provision.

In addition to being data subjects in relation to their own personal data, trainees act as data processors when handling personal data relating to pupils, parents, or staff during placements.

Accordingly:

- All trainees must complete mandatory data protection training as part of programme induction.
- Trainees must always comply with Trust data security requirements; and
- Trainees are subject to a mandatory VNHTT Trainee Code of Conduct, which includes specific obligations relating to:
  - Secure handling of personal data.
  - Remote working and off-site access.
  - Use of mobile phones, laptops, and personal devices; and
  - Reporting of actual or suspected data breaches.

Failure to comply may result in disciplinary, safeguarding, or professional consequences.

## **A8. Data Protection by Design and Impact Assessments**

The Trust and VNHTT will apply the principle of Data Protection by Design and Default to all ITT activity involving personal data.

Where ITT provision involves new systems, technologies, or methods of processing that may present a risk to data subjects' rights, VNHTT will complete a Data Protection Impact Assessment (DPIA) in consultation with the Trust DPO.

## **A9. Monitoring, Benchmarking and Quality Assurance**

VNHTT will lawfully collect and analyse data across the trainee lifecycle for purposes including:

- Internal quality assurance and programme evaluation.
- Benchmarking against sector data and national trends where appropriate; and
- Meeting reporting requirements to the DfE, accrediting bodies, and inspectors.



Where possible, data will be anonymised or pseudonymised and will always be handled in accordance with data protection legislation.

#### **A10. Retention of ITT Records**

In addition to the Trust's overarching Retention Schedule, VNHTT retains ITT trainee records for a standard period of three years following programme completion or withdrawal.

This retention period is justified to:

- Meet DfE, Ofsted, and accreditation audit requirements.
- Respond to references, employment checks, and professional conduct enquiries; and
- Support quality assurance, benchmarking, and review of ITT provision.

At the end of the retention period, data will be securely destroyed or anonymised in line with Trust procedures.

#### **A11. Relationship to the Main Data Protection Policy**

This Appendix supplements the Trust's Data Protection Policy by clarifying its application to Initial Teacher Training provision delivered through VNHTT.

Together, they provide a coherent, legally compliant, and sector-informed framework for protecting personal data across all Trust and VNHTT activities.