

## Privacy Notice for Registrants and non-registered Managers

This is the Privacy Notice ("Notice") of the General Teaching Council for Scotland ("GTC Scotland", "we", "us") for registrants and non-registered managers within a GTC Scotland validated system and should be read in conjunction with the GTC Scotland General Privacy Notice, which is available on our website.

Our email address in respect of this Notice is [informationgovernance@gtcs.org.uk](mailto:informationgovernance@gtcs.org.uk). Any enquiries relating to the processing of personal data, including matters arising from this Notice, should be addressed to our Data Protection Officer at [informationgovernance@gtcs.org.uk](mailto:informationgovernance@gtcs.org.uk). If email is not available to you then please write to our Data Protection Officer at:

General Teaching Council for Scotland  
Clerwood House  
96 Clerwood Road  
Edinburgh, EH12 6UT

## What Is the Purpose of This Privacy Notice?

GTC Scotland is committed to protecting the privacy and security of registrants. This Notice describes how we collect and use personal data about you during the time that you are registered with GTC Scotland in accordance with the UK General Data Protection Regulation ("GDPR"). This Notice applies to personal data being processed by GTC Scotland in respect of registrants including the provision of access to the MyGTCS and Professional Update systems in line with the status.

As a data controller, GTC Scotland is responsible for making decisions about the means by which, and the purposes for which, we process your personal data. We are required under data protection legislation to notify you of the information contained in the Notice. It is important that you read this Notice, together with any other privacy notice we provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using such information.

## Changes To This Privacy Notice

We reserve the right to update this Notice at any time and we will provide a new privacy notice through the GTC Scotland website and MyGTCS when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

## How Does GTCS Collect Your Personal Data?

We collect personal data about you in a number of ways throughout the process for when you are applying to become registered, either directly from you or sometimes from third party, for example, from an education institution, from an employer or former employer, from a referee or a background check provider.

## How Will GTCS Use Your Personal Data?

We will only use your personal data where we are permitted to do so by law and in accordance with data protection law. As your professional regulatory body, GTC Scotland may process your personal data in the context of our investigations into fitness to teach cases, for the conduct of fitness to teach hearings or reporting on those hearings. We may also contact you to highlight any teaching job opportunities that we have been asked to share with registrants. Such processing will either be undertaken:

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- to comply with a legal obligation;
- where it is necessary in the public interest; and
- for the exercise of official authority; or where it is in the substantial public interest and in accordance with the law.

## Purposes For Which We Will Use Your Personal Data

We consider that we may need to process some of the categories of personal data as detailed

in the GTC Scotland General Privacy Notice (under the section “Category of Personal Data” we process about you) in relation to you, primarily to allow us to perform our statutory functions. In some cases, we may use your personal data to pursue legitimate interests of our own or those of third parties, but only in respect of functions which do not fall within our public authority functions. Purposes for which we expect to process your personal data are listed in the table below, setting out the category of personal data, the lawful basis for processing and the time-period for which we will retain that data in respect of each category of individual:

Activity	Category of personal data	Lawful basis for processing including basis for legitimate interest	Retention period or criteria to determine retention period
<b>To maintain a register of teachers in Scotland</b>	Identity data Contact data Professional data	To comply with a legal obligation.  Performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	Until notification of death of the registrant or 50 years from the date of registration removal (whichever is earliest)
<b>To ensure that registrants have access to professional learning and support tools available on the MyGTCS system</b>	Identity data Contact data Professional data	Where necessary for the performance of a contract to which the data subject is party.  To comply with a legal obligation to which we are subject.  Performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	Until notification of death of the registrant or 50 years from the date of registration removal (whichever is earliest)  Professional learning data is held for 6 years.
<b>To ensure that registrants are kept appropriately informed of developments in the teaching profession.</b>	Identity data  Contact data	Where necessary for the performance of a contract to which the data subject is party. To comply with a legal obligation to which we are subject.  Performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	Until notification of death of Registrant or 50 years from date of registration removal (whichever is earlier)

To communicate with you regarding the process for making annual registration fee payments	Identity data Contact data	Where necessary for the performance of a contract to which the data subject is party. To comply with a legal obligation to which we are subject.  Performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	12 months from date of receipt of information, details are entered onto Atlas database and held until notification of death of Registrant or 50 years from date of registration removal (whichever is earlier)
To communicate with you regarding collection of the annual registration fee payments online through the MyGTCS system or by internet banking	Identity data Contact data Financial data	Where necessary for the performance of a contract to which the data subject is party. To comply with a legal obligation to which we are subject.  Performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	12 months from date of receipt of information, details are entered onto Atlas database and held until notification of death of Registrant or 50 years from date of registration removal (whichever is earlier)
To obtain a registration number from Scottish Public Pension Agency (SPPA) s	Identity data	Where necessary for the performance of a contract to which the data subject is party. Performance of a legal obligation to which we are subject.  Necessary for the performance of a task in the public interest or the exercise of official authority vested in GTCS.  Necessary for reasons of substantial public interest.	12 months from date of receipt of information as this information is then stored on Atlas and held until notification of death of Registrant or 50 years from date of registration removal (whichever is earlier)
<b>Professional Update</b>			
To provide support to registrants in relation to their professional update responsibilities	Identity data Contact data Professional data	Where necessary for the performance of a contract to which the data subject is party. To comply with a legal obligation to which we are subject.  Performance of a task	Information is held for all registrants who are subject to professional update. Each cohort is a five year cycle and information is kept on record until notification of death of the

		carried out in the public interest or in the exercise of official authority vested in the controller	Registrant or 50 years from date of registration removal (whichever is earlier)
<b>To maintain a database of Professional Update cohort information through MyGTCS systems</b>	<p>Identity data</p> <p>Contact data</p> <p>Professional data</p> <p>Special category data including information about criminal convictions and offences and information about your health</p>	<p>To comply with a legal obligation to which we are subject.</p> <p>Performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>	Information is held for all registrants who are subject to professional update. Each cohort is a five year cycle and information is kept on record until notification of death of the Registrant or 50 years from date of registration removal (whichever is earlier)
<b>To enable registrants to update and maintain their records of professional learning</b>	<p>Identity data</p> <p>Professional data</p>	<p>Where necessary for the performance of a contract to which the data subject is party. To comply with a legal obligation to which we are subject.</p> <p>Performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>	Information is held for all registrants who are subject to professional update. Each cohort is a five year cycle and information is kept on record until notification of death of the Registrant or 50 years from date of registration removal (whichever is earlier)
<b>To enable GTCS to undertake a Professional Update Annual Evaluation which is published by GTCS</b>	<p>Identity data</p> <p>Contact data</p> <p>Professional data</p>	<p>To comply with a legal obligation to which we are subject.</p> <p>Performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>	Information is held for all registrants who are subject to professional update. Each cohort is a five year cycle and information is kept on record until notification of death of the Registrant or 50 years from date of registration removal (whichever is earlier)

<b>To enable GTCS to ensure that all registrants have the required level of registration.</b>	<p>Identity data</p> <p>Contact data</p> <p>Professional data</p>	<p>To comply with a legal obligation to which we are subject.</p> <p>Performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>	<p>Information is held for all registrants who are subject to professional update. Each cohort is a five year cycle and information is kept on record until notification of death of the Registrant or 50 years from date of registration removal (whichever is earlier)</p>
<b>To enable GTCS to process direct submission applications</b>	<p>Identity data</p> <p>Contact data</p>	<p>Performance of a legal obligation to which we are subject.</p> <p>Necessary for the performance of a task in the public interest or the exercise of official authority vested in GTCS.</p> <p>Necessary for reasons of substantial public interest.</p>	<p>Information is held for all registrants who are subject to professional update. Each cohort is a five year cycle and information is kept on record until notification of death of the Registrant or 50 years from date of registration removal (whichever is earlier)</p>
<b>To enable GTCS to manage Affiliate level registrants</b>	<p>Identity data</p> <p>Contact data</p> <p>Professional data</p>	<p>To comply with a legal obligation to which we are subject.</p> <p>Performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>	<p>Information is held for all registrants who are subject to professional update. Each cohort is a five year cycle and information is kept on record until notification of death of the Registrant or 50 years from date of registration removal (whichever is earlier)</p>
<b>To enable PU deferral requests to be processed</b>	<p>Identity data</p> <p>Contact data</p> <p>Special category data including information about health and information about criminal</p>	<p>Where necessary for the performance of a contract to which the data subject is party. To comply with a legal obligation to which we are subject.</p> <p>Performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>	<p>Information is held for all registrants who are subject to professional update. Each cohort is a five year cycle and information is kept on record until notification of death of the Registrant or 50 years from date of registration removal (whichever is earlier)</p>

	convictions and offences		
To liaise with the Regulation Team in relation to registrants who are subject to a Fitness to Teach investigation to identify the most appropriate solution with regards PU	<p>Identity data</p> <p>Contact data</p> <p>Professional data</p> <p>Special category data including information about criminal convictions and offences</p>	<p>To comply with a legal obligation to which we are subject.</p> <p>Performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>	Information is held for all registrants who are subject to professional update. Each cohort is a five year cycle and information is kept on record until notification of death of the Registrant or 50 years from date of registration removal (whichever is earlier)
To enable PU administrators to provide required access to Local Authorities co-ordinators and College employers	<p>Identity data</p> <p>Contact data</p> <p>Professional data</p>	<p>To comply with a legal obligation to which we are subject.</p> <p>Performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>	Information is held for all registered teachers who are subject to professional update. Each cohort is a five year cycle and information is kept on record until notification of death of the Registrant or 50 years from date of registration removal (whichever is earlier)
To enable PU Team to contact you in relation to your professional update responsibilities	<p>Identity data</p> <p>Contact data</p>	<p>Where necessary for the performance of a contract to which the data subject is party. To comply with a legal obligation to which we are subject.</p> <p>Performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>	Information is held for all registrants who are subject to professional update. Each cohort is a five year cycle and information is kept on record until notification of death of the Registrant or 50 years from date of registration removal (whichever is earlier)



Stepping Stones Programme			
To enable Education Scotland to provide GTC Scotland with information relating to registrants undertaking the Stepping Stones programme	Identity data  Professional data  Contact data	Necessary for the performance of a task in the public interest or the exercise of official authority vested in GTC Scotland.	Data will be kept for up to four years from the date of a participant's full registration or until cessation of the programme - if that date is earlier.
To enable Education Scotland to provide GTC Scotland with enhanced record of programme completion for those Registrants undertaking the Stepping Stones programme	Identity data  Professional data  Contact data	Necessary for the performance of a task in the public interest or the exercise of official authority vested in GTC Scotland.	Data will be kept for up to four years from the date of a participant's full registration or until cessation of the programme - if that date is earlier.
To enable GTC Scotland to provide Education Scotland with participants and other stakeholders feedback on the programme and contribution thought the programme as provided	Identity data  Professional data	Necessary for the performance of a task in the public interest or the exercise of official authority vested in GTC Scotland.	Data will be kept for up to four years from the date of a participant's full registration or until cessation of the programme - if that date is earlier.
To enable Education Scotland to provide GTC Scotland with participants and other stakeholders feedback on the programme and contribution thought the programme as provided	Identity data  Professional data	Necessary for the performance of a task in the public interest or the exercise of official authority vested in GTC Scotland.	Data will be kept for up to four years from the date of a participant's full registration or until cessation of the programme - if that date is earlier.



Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

## GTC Scotland Register of Teachers

The online register enables members of the general public or employers to check the registration status of any individual who is on the Register of Teachers.

The information displayed will confirm if an individual is registered with GTC Scotland, if they are subject to a temporary restriction order or are subject to a current fitness to teach disposal order (i.e. reprimand, condition, or combination of both). Where a registrant has been removed from the Register as a result of a fitness to teach decision, this will be displayed for a period of two years.

The information relating to a registrant which is available when a member of the general public searches the Register is:

- |                       |                                |
|-----------------------|--------------------------------|
| ▪ Name and surname    | ▪ Current employer             |
| ▪ Sex                 | ▪ Professional recognition     |
| ▪ Registration status | ▪ Fitness to Teach information |
| ▪ Registrations       |                                |

The information relating to a registrant which is available when an employer (the Local Authority or College employer) searches the Register is:

- |                                    |   |
|------------------------------------|---|
| ▪ Name and surname                 | ▪ Provisional Registration Date         |
| ▪ Sex                              | ▪ Full Registration Data                |
| ▪ Membership number                | ▪ Fitness to Teach information          |
| ▪ GTC Scotland Registration Number | ▪ Professional Update year              |
| ▪ Grade                            | ▪ Professional Update completion date   |
| ▪ Qualification date               | ▪ Professional recognition subject name |
| ▪ Awarding authority               | ▪ Date of professional recognition      |
| ▪ Registration status              |   |
| ▪ Registrations                    |   |
| ▪ Current employer                 |   |

# MyGTCS

MyGTCS is a personalised and secure web portal for registrants. By registering on MyGTCS you will be able to:

- Update your personal details including your employment information
- Log your Professional Learning
- Read Journals
- Pay your Annual Registration online
- Update your mailing list preferences
- Update your election category
- Access the profiles for students for whom you are a mentor

If you are a provisionally registered teacher your identified Probation Manager, Reviewer and Supporter will have access to the following information:

- Your GTC Scotland Registration Number
- Your full name
- Your registrations
- Your Registrant status
- Your Registration status
- Your Provisional Registration Profile (you can select an expiry date for access to this)

You will have access to **MyPL** which is a tool to enable and support professional learning by Registrants where you can:

- Record your professional learning
- Record your areas for development
- Record your PRD meetings
- View and share academic, management and leadership resources
- Submit your professional update

Your identified PU Co-ordinator from your employer and school or establishment will have access to MyPL through the co-ordinator portal in which they will be able to see the following information:

- Your registration number
- Your full name
- Your email address (which you have recorded on MyGTCS)
- Your Registration status
- Name of your employer & establishment
- PU Year
- PU status
- Shared Professional learning entries which you have chosen to share

- Professional learning entries – PRD
- Name and registration number of your reviewer
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## If You Fail to Provide Personal Data

If you fail to provide certain information when requested, this may impact on your registration, as we may be prevented from complying with our legal obligations or meeting other legal requirements in respect of such applications.

## Who Do We Share Your Personal Data With?

- Your line manager will be able to access your full professional learning record, if you have chosen to share this.
- Your reviewer and supporter, as chosen by you, will be able to see your entire Provisional Registration Profile when you create (and they accept) an association.
- Your Probation Manager will be able to see your entire Provisional Registration Profile (unless you opt out) when you create an association.
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- Your observer, as chosen by you, will be able to see records of observations which you have chosen to share with them.
- Your employer (the Co-ordinator for Professional Update at your Local Authority or College employer) will also be able to view your PU status on your MyGTCS profile.
- GTC Scotland will share information relating to your Professional Update with the PU Co-ordinator at your Local Authority or College employer and the identified co-ordinator within your school or establishment.
- We will share information with the local authority or College employer in relation to your professional update
- Fully registered teachers will also be able to share their Professional Learning Record/MyPL records with their reviewer.

To allow GTC Scotland to fulfil its statutory function or where we have another legitimate interest in doing so in relation to performing our statutory fitness to teach function, on occasion, we may have to share your personal data when it is lawful to do so with third parties such as:

- 1) Scottish Government – only for statistical and reporting purposes
- 2) Scottish Public Pension Agency (SPPA)
- 3) Secure Trading (in relation payments)
- 4) Mailing houses who are involved in the process of communicating with you
- 5) MillerTech, C2 Software, Commisum, Seric, Fortesium and NVT who are our third-party

- suppliers/developers for the IT systems
- 6) Education Scotland (providers of the GLOW system)
- 7) Colleges Scotland
- 8) Scottish Funding Council
- 9) College Development Network

Please note that this is not an exhaustive list and may be subject to change.

## **Change Of Purpose**

We will only use your personal data for the purposes for which we collected it. We may, on occasion, need to use your data for another reason, but only where that reason is compatible with the original purpose. If we need to use your personal data 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 data without your knowledge or consent. However, be assured that we will only do this where the purpose for processing is in compliance with the above rules, where this is required or permitted by law

## **Information About Allegations of Criminal Offences, Criminal Convictions, Sentences**

If whilst as a registrant you are the subject of a criminal investigations, our Fitness to Teach team will gather information relating to allegations of criminal offences, criminal convictions and sentences.

We may only use information relating to allegations of criminal offences, criminal convictions and sentences where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our Data Protection Policy and Fitness to Teach Rules.

In the event that a registrant is subject to a Temporary Restriction Order or a Removal Order, we are required by law to share this information on the Internal Market Information (IMI) system. To make an entry on the IMI system we are required to disclose your name, GTC Scotland registration number, date of birth and national insurance number. This information is then available to relevant authorities throughout Europe.

## Your rights under data protection

- To obtain access to, and copies of, the personal data we hold about you. Further information on how to make such an application can be found on our website.
- To require that we cease processing your personal data if the processing is causing you damage or distress;
- To require us not to send you marketing communications;
- To request that we erase your personal data;
- To request that we restrict our data processing activities in relation to your personal data;
- To receive from us the personal data we hold about you, which you have provided to us, in a reasonable format specified by you, including for the purpose of transmitting that personal data to another data controller; and
- To require us to correct the personal data we hold about you if it is incorrect;
- To withdraw your consent for the specific processing of your name and email address at any time.

## How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us using the contact details provided in this Notice.

You can also complain to the Information Commissioner's Office if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House Water Lane Wilmslow Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: [www.ico.org.uk](http://www.ico.org.uk)



# The General Teaching Council for Scotland

We are the independent regulator for teachers in Scotland. We work to enhance trust in teachers in the public interest by setting, upholding and promoting high standards.

Website: [www.gtcs.org.uk](http://www.gtcs.org.uk)

Email: [gtcs@gtcs.org.uk](mailto:gtcs@gtcs.org.uk)