Privacy notice for Chiltern Teaching School Hub

1. Introduction

Under UK data protection law, individuals have a right to be informed about how the Chiltern Learning Trust and Chiltern Teaching School Hub use any personal data that is held about them. We comply with this right by providing 'privacy notices' to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals we engage with with regards to the Chiltern Teaching School Hub.

The Chiltern Learning Trust is the 'data controller' for the purposes of UK data protection law and will ensure that personal data is processed fairly and lawfully, is accurate, is kept secure and is retained for no longer than is necessary.

2. The personal data we hold

We process data relating to individuals who are registered with the Chiltern Teaching School Hub or we otherwise engage with. This includes individuals from schools signing up to ECF and Appropriate Body Services, ECTs, ECT mentors, Induction Coordinators and facilitators, NPQ participants and facilitators, CPD attendees, Delivery Partners, individuals from schools hosting CPD, individuals from schools that engage with the Teaching School Hub through Expression of Interest forms, and schools/individuals who otherwise contact us.

We will only use the data for the purposes for which it was provided. Personal data that we may collect, use, store and share (when appropriate) about individuals will depend on their role in the process, and may include, but is not restricted to:

- Your name
- Contact details
- Copies of right to work documentation
- References
- Evidence of qualifications
- Employment records, including work history, job titles, training records and professional memberships
- Information about your use of our information and communication systems, equipment and facilities (e.g. school computers)

We may also collect, use, store and share (when appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Information about race, ethnicity, religious beliefs, sexual orientation and political opinions
- Information about disability and access requirements
- Photographs and CCTV images captured in school/on site

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

3. Why we use this data

We use the data listed above to manage our relationship with you and deliver our services, and to ensure we fulfil our obligations as part of any contract with you, including to:

- Undertake our role as an Appropriate Body
- Enable delivery of the ECF
- Enable delivery of CPD and NPQs

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require references for this role and you fail to provide us with the relevant details, we will not be able to take your application further.

We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for any other reason and that reason is incompatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and 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.

3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you marketing information by email promoting the work of the hub, invitations to future events and professional development opportunities that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

3.2 Use of your personal data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

4. Our lawful basis for using this data

We only collect and use your personal data when the law allows us to. Most commonly, we process it where we need to:

- perform an official task in the public interest
- fulfil a contract/agreement with you and/or your school/trust
- comply with DfE statutory requirements

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

- you have given us consent to use it in a certain way, e.g. reference requests, marketing and recruitment.
- we need to protect your vital interests (or somebody else's)

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.

5. Collecting this data

We will only collect and use your data when the law allows us to (as detailed above in section 4 of this notice).While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily. 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.

As well as information directly collected from ECTs, AB registrations and from those expressing an interest with the NPQs or other CPD, we also collect or receive information from other public sources, if relevant to job or course role. Best Practice Network and University College London share programme participant details with us.

6. How we store this data

Personal data is stored securely on our CRM and internal databases, and is only accessible to employees of CTSH. We will retain your personal data for as long as it is necessary to fulfil the purposes for which it was collected.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will securely dispose of your personal data securely when we no longer need it.

7. Who we share data with

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 UK data protection law) we may share personal information about you with third parties such as our Delivery Partners, programme facilitators and assessors, funding or government bodies such as the Department for Education and Ofsted, our Data processors and any third parties which require us to share your personal data to fulfil our legal obligations, such as auditors.

All our third-party service providers are carefully selected, meet high data protection and security standards and are bound by an agreement to keep any information we share with them confidential. We only share the personal data with them that is necessary for the services they provide, and they will only process that data in accordance with our instructions. We will never share your data with any third party for their own marketing purposes.

7.1 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 UK data protection law.

8. Your rights

8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that apply):

- 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 us (see 'Contact us' below).

8.2 Your other rights regarding your data

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

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge 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
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office if you feel we have not used your information in the right way
- Claim compensation for damages caused by a breach of the data protection regulations

We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

- Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task
- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests
- Right to object to use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent

To exercise any of these rights, please contact us (see 'Contact us' below).

9. 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.

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

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

10. Contact us

The **Data Protection Officer** is Mr Patrick Aikman, Chiltern Learning Trust, c/o Redgrave Children and Young Peoples Centre, Redgrave Gardens, Luton, LU3 3QN.

Email: dpo@chilternlearningtrust.org

However, our **Data Protection Lead** has day-to-day responsibility for data protection issues at CTSH. If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact Claire Justin: cjustin@chilternlearningtrust.org