

# **Privacy Notice L.E.A.D. Professional Development/ Teaching School Hub**

### Document Management Information

<b>Applicable to:</b>	All staff in all Academies and Central Support Services including individuals employed by the Trust, contractors and agency staff. All Members and Trustees.
<b>Dissemination:</b>	The policy will be available to staff via the Trust's Policy Centre
<b>Implementation:</b>	Applicable to L.E.A.D. Professional Development Staff
<b>Training:</b>	On request
<b>Review Frequency:</b>	The policy will be reviewed every three years. The policy will also be reviewed earlier if needed in the light of new evidence/legislation/guidance
<b>Policy Author:</b>	Amanda Griffiths, Teaching School Hub Director
<b>Executive Policy Owner:</b>	Bobby Thandi, Deputy Chief Executive
<b>Approval Date:</b>	1 <sup>st</sup> September 2024
<b>Next Review Due:</b>	September 2025

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## 1. Introduction

- 1.1 Under data protection law, individuals have a right to be informed about how the Trust and its use any personal data that is held about them. We, L.E.A.D. Academy Trust, comply with this right by providing Privacy Notices to individuals where we are processing their personal data. L.E.A.D. Professional Development is a subsidiary company within L.E.A.D. Academy Trust. L.E.A.D. Professional Development encompasses, L.E.A.D. Teaching School Hub, The Witham St Hughs English Hub, L.E.A.D. Active and L.E.A.D. Academy Trust's Professional Development. All of these services provide professional development for teachers and leaders.

## 2. Document Purpose

- 2.1 The purpose of this Privacy Notice is to explain how the Trust collects, stores and uses personal data about individuals we engage with regards to the Trusts L.E.A.D. Professional Development.

## 3. Definitions

- 3.1 **Trust** means all Academies within the L.E.A.D. Academy Trust , as well as Head Office and central services operations including L.E.A.D. Professional Development.
- 3.2 **Executive Leadership Team** means the Chief Executive Officer ("CEO") and the direct line management reports of the CEO (the "Directors").

### Privacy Notice – Teaching School Hub

## 4. Data Controller and Processors

- 4.2 L.E.A.D. is the Data Controller for the purposes of data protection law and therefore will determine the purposes for which personal data is processed (the 'why' and the 'how'). Authorised 3rd parties, e.g. Bromcom, process and 'use' data on behalf of (under the supervision/control) the Trust and are therefore Data Processors.
- 4.3 The postal address of the Trust is:  
5a, The Ropewalk  
Nottingham  
NG15DU
- 4.4 The Trusts Data Protection Officer is Lee Jepson
- 4.5 The Trust will ensure that your personal data is processed fairly and lawfully, is accurate, is kept secure and is retained for no longer than is necessary.

## 5. The Categories of Personal Data L.E.A.D. Professional Development Holds

- 5.1 We process data relating to those we otherwise engage with. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:
- Personal information, including name, email address, your employer/school name, a booking contact (if different) and any details that you have specifically entered when booking a place on a course/event or making an enquiry.
  - Other information relating to Early Careers Teachers Programme and information required to register for courses/training offered through the Teaching School Hub/English Hub or lead provider which may include and not be limited to, date of birth, ethnicity, gender, education and work data, next of kin details and a photograph or qualifications.

## 6 The type of personal information we collect

We currently collect and/or process the following information:

- Personal identifiers, contacts, and characteristics (this includes names, contact information, data regarding gender, religion, or ethnicity)
- Employment records
- Teacher reference number
- Qualifications
- Assessment data and feedback

**See Appendix A for more details**

## 7 How we get the personal information and why we have it

We process personal data provided to us directly by you for the following purposes:

- As part of applications for National Professional Qualifications (NPQ)
- As part of early career framework-based induction
- As part of school-based initial teacher training (ITT)
- As part of the appropriate body services for early career teachers
- As part of continuous professional development programmes
- As part of the Witham St Hughs English Hub

## 8. We also receive personal information indirectly, from the following sources in the following scenarios:

- Schools: data is submitted from schools for the areas of Early Career Framework
- Lead Providers: data is submitted from lead providers to assist with some aspects of Early Career Framework and National Professional Qualifications
- Department for Education
- Local Authority data e.g. results and performance

## 9 We use your information, from both yourself and third parties, for the following reasons:

- To comply with statutory reporting to the Department for Education
- To monitor training and development
- To determine programme delivery e.g., number of cohorts
- Create user accounts for your learning
- To subscribe users to our service or publications, including event invites and product or services marketing.
- To provide us with feedback
- To comply with financial audits

## 10 Sharing your information

We may share this information with the following:

- Teaching Schools Hub delivery partners, e.g. Trusts.
- Lead Providers (see Appendix B)
- Appropriate Body Assessors
- Other departments within the Teaching School Hub

- Department for Education
- Local authorities
- Third party consultants\*
- \*We ensure that all third parties that we share your data with are compliant with GDPR regulations and have appropriate policies and procedures in place.

## 11. Our Lawful Basis for Using this Data

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing different types of information are:

- (a) Your consent. Consent can be withdrawn at any time. You can do this by contacting [admin@leadtshub.co.uk](mailto:admin@leadtshub.co.uk)
- (b) We have a contractual obligation.
- (c) We have a legal obligation.
- (d) We have a vital interest.
- (e) We need it to perform a public task.
- (f) We have a legitimate interest.

12. To see which data is held under which legal basis, please view our data asset register by contacting [Admin@leadtshub.co.uk](mailto:Admin@leadtshub.co.uk). 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. More detail is contained in the Trust's Data Protection Policy.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the Trust's use of your data.

## 13. Special Category Data

From time to time, we may process special category data, which under UK GDPR is defined as:

- Personal data revealing racial or ethnic origin.
- Personal data revealing political opinions.
- Personal data revealing religious or philosophical beliefs.
- Personal data revealing trade union membership.
- genetic data.
- biometric data (where used for identification purposes).
- Data concerning health.
- Data concerning a person's sexual orientation

If special category data is processed, then we will ensure that this is processed lawfully, fairly, and transparently complying with all the other principles and requirements of the UK GDPR, which also includes meeting one of the specific conditions in Article 9 of the UK GDPR.

### a. Collecting Information

- i. Whilst 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 will 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.

#### **14. How L.E.A.D. Stores the Data**

Your information is securely stored. We store all information in a cloud-based system/management information system/physical server at L.E.A.D. Academy Trust. Access to your data is restricted, with limited staff having access. Furthermore, where possible additional security methods are implemented, such as two-factor authentication.

##### **a. Data Sharing**

- i. We do not share personal information about you with any third party without your consent unless the law and our policies allow us to do so. We may share your booking details and CPD feedback with the DFE if we are asked to do so.

##### **b. Transferring Data Internationally**

- i. 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.

##### **c. CCTV**

- i. At the site of the L.E.A.D. Professional Development site CCTV is operated. This is considered necessary to protect staff, students' and visitor's safety and/or Trust property.

##### **d. Your Rights**

- i. You have the right to:

- Your right of access - You have the right to ask us for copies of your personal information. You can do this by submitting a Subject Access Request (SAR).
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

If you make a request, we have one month to respond to you. If the request is deemed complex, we may extend the deadline by up to a further two months; you will be informed promptly if this is the case.

1. Let you know whether any automated decision-making is being applied to the data, and any consequences of this.
  2. Give you a copy of the information in an intelligible form.
  3. Respond without delay and within one month of receipt of the request.
- ii. More information regarding Subject Access Requests is detailed in the Trust Data Protection Policy, this can be found on the Trusts website.

**e. Your other rights regarding your data**

- i. Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:
1. Object to the use of your personal data if it would cause, or is causing, damage or distress.
  2. Prevent your data being used to send direct marketing.
  3. 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).
  4. In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- ii. To exercise any of these rights, please email

**f. Complaints**

- i. 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 the DPO in the first instance
- ii. Alternatively, you can make a complaint to the Information Commissioner's Office:
1. Report a concern online at <https://ico.org.uk/concerns>
  2. Call 0303 123 1113.
  3. Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

**g. Contact Details – Data Protection Officer (DPO)**

- i. If you have any questions, concerns or would like more information about anything mentioned in this Privacy Notice please contact our DPO, details below:
1. Data Protection Officer, Lee Jepson : [leejepson@leaditservices.co.uk](mailto:leejepson@leaditservices.co.uk)

## Appendix A

### Initial Teacher Training:

- Applicant online forms, including a wide range of personal data equivalent to applying for a job
- Trainee performance data across the year
- Feedback from schools on progress of trainees
- Welfare data is shared between the training provider and schools, and schools would share concerns about performance and welfare back to the training provider

### Early Career Framework:

- Names and contact details for programme members and support, including Early Career Teachers, Mentors and Senior Leader responsible
- Engagement data for programme members, including attendance at seminars, completion of online learning tasks
- Survey data, including views or programme members on their experience of programme
- Factors effecting ECTs, including part time / full time status, interruptions to programme participation due to ill health / absence from work
- ECT and Mentor Teacher Reference Number

### Appropriate Body:

- Names and contact details for Early Career Teachers
- Their employment details (e.g., subject) and employment status (part time, temporary contract etc)
- Mentor and school ECT Lead contact details
- Performance-related documents relating to ECT, including lesson observation notes, termly reports completed by mentors and end of year Assessment Report
- Cause for concern notices where ECTs performance is below expectation and at risk of not completing induction
- Interruptions to programme participation due to ill health / absence from work
- ECT Teacher Reference Number

### National Professional Qualifications:

- Names and contact details of programme members
- Details of career pathway
- Role details
- Application statement and submission, outlining achievements
- Engagement data for programme members, including attendance at seminars, completion of online learning tasks
- Survey data, including views or programme members on their experience of programme
- Programme member Teacher Reference Number

**General contact data:** TSHs collect general contact detail on school leaders and staff in school that engage with TSHs; these contacts are used for marketing purposes.