

Privacy Notice

How we use Information Provided by those Engaging with Thames West Language Hub Programme

Under data protection law, individuals have a right to be informed about how the Trust uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals participating in courses or services provided by Thames West Language Hub (based at Ada Lovelace CofE High School part of Twyford Church of England Academies Trust).

Twyford Church of England Academies Trust is the 'Data controller' for the purposes of data protection law.

We have appointed Grow Education Partners Ltd as our data protection officer (DPO) and the responsible contact is Claire Mehegan (see 'Contact us' below).

1. The personal data we collect and hold

We process the personal data of those engaging with Thames West Language Hub programmes at expression of interest, application, enrolment, programme and completion stages. Personal data that we may collect about you during this process, and subsequently use, store and share (when appropriate) may include, but is not limited to:

- Personal information (such as name, date of birth);
- Contact details and preferences (such as telephone number, email address, postal address);
- Your school information - Name of your current school, school URN, school contact number and address;
- LEA area, school setting type, school phase, school specialism, number of pupils on the roll, percentage of free school meal pupils;
- Invoice information – who is paying for the course (if applicable), their contact name, email address, telephone number and address and payment details;
- Marketing information: how you heard about our course and whether we can contact
- Closed-circuit television (CCTV) images;
- Dietary information;
- Protected characteristics (such as race, ethnicity, religious beliefs, sexual orientation)
- Relevant Medical Information (such as disability and access requirements).

Special category data that we may collect about you if you enrol on one of our programmes:

- Medical and health information
- Ethnicity
- DBS criminal record checks information

A full breakdown of the information we collect can be found in the record of data processing which can be requested from Richard Lane, Director of Finance & Operations (email rlane@twyfordacademies.org.uk , phone 020 3301 3189).

2. Why we collect and use this data

The purpose of collecting and processing this data includes but is not limited to:

- Contact you with information about the programmes that we offer;
- Enrol you on to the programme you have selected to undertake;
- Provide reasonable adjustments and meet our obligations under the Equality Act 2010;
- Carry out research for quality assurance and standards of our programmes;
- Carry out research to improve our programmes;
- Meet your needs in terms of any special requirements or medical/health requirements during your programme of study;
- Comply with our obligations set out by the DfE, regulators and other associated bodies;
- Fulfilling our contractual and legal obligations;
- To fulfil our safeguarding obligations towards pupils;
- Enabling equalities monitoring;
- Ensuring that appropriate access arrangements can be provided for participants that require them.

3. Our lawful basis for using this data

This section contains information about the legal basis that we are relying on when handling your information. These are defined under data protection legislation and for personally identifiable information are:

- You have given consent for one or more specific purposes
- Processing is necessary to fulfil a contract or to take specific steps before entering into a contract
- Processing is necessary to comply with the school's legal obligations
- Processing is necessary to protect your vital interests
- Processing is necessary for tasks in the public interest or exercise of authority vested in the controller (the provision of education).

When we process special category information, which is deemed to be more sensitive, the following lawful basis are used:

- You have given explicit consent;
- It is necessary to fulfil the school's obligations or your obligations;
- It is necessary to protect your vital interests;
- Processing is carried out by a foundation or not-for-profit organisation (includes religious, political or philosophical organisations and trade unions);
- Reasons of public interest in the area of public health.

Where we have obtained consent to use personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

4. Collecting this information

We collect information directly from you when you submit an expression of interest form or an application form or at other times. While the majority of information we collect about you is mandatory, some information can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

5. How we store this data

Personal data we collect as part of the course application and administration process is stored in line with our Data Protection Policy. When it is no longer required, we will delete your information in accordance with our Data Retention Policy. The Data Retention Policy can be requested from Richard Lane, Director of Finance & Operations (email rlane@twyfordacademies.org.uk , phone 020 3301 3189).

6. Unsuccessful Candidates

If your course application is unsuccessful, we will hold your data on file for 6 months after the end of the course recruitment process.

At the end of that period, your data is deleted or destroyed.

7. Who we share data with

In order for us to legally, effectively and efficiently function we are required to share data with appropriate third parties, including but not limited to

- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as partner schools, auditors, professional advisors and consultants, DBS services, and software suppliers;
- The Department for Education.

8. Transferring data internationally

We may send your information to other countries where:

- we or a company we work with store information on computer servers based overseas; or
- we communicate with you when you are overseas.

We conduct due diligence on the companies we share data with and note whether they process data in the UK, EEA (which means the European Union, Liechtenstein, Norway and Iceland) or outside of the EEA.

The UK and countries in the EEA are obliged to adhere to the requirements of the GDPR and have equivalent legislation which confer the same level of protection to your personal data.

From organisations who process data outside the UK and EEA we will assess the circumstances of how this occurs and ensure there is no undue risk.

Additionally, we will assess if there are adequate legal provisions in place to transfer data outside of the UK.

9. Data Protection Rights

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- 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
- NOT provide information where it compromises the privacy of others
- 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.

In most cases, we will respond to subject access requests within 1 month, as required under data protection legislation. However, we are able to extend this period by up to 2 months for complex requests or exceptional circumstances.

Your Other Rights regarding your Data:

- Withdraw your consent to processing at any time (This only relates to data for which the school relies on consent as a lawful basis for processing)
- Ask us to rectify, erase or restrict processing of your personal data, or object to the processing of it in certain circumstances and where sufficient supporting evidence is supplied
- Prevent the use of your personal data for direct marketing
- Challenge processing which has been justified on the basis of public interest, official authority or legitimate interests.
- Request a copy of agreements under which your personal data is transferred outside of the United Kingdom.
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect you)
- Request a cease to any processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Submit a complaint to the ICO
- Ask for your personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances).

If you would like to exercise any of the rights or requests listed above, please contact Richard Lane, Director of Finance & Operations (email: rlane@twyfordacademies.org.uk, phone: 020 3301 3189, address: Twyford C of E Academies Trust, Twyford Crescent, London W3 9PP).

The School will comply with the data protection legislation in regard to dealing with all data requests submitted in any format, individuals are asked to preferably submit their request in written format to assist with comprehension.

We reserve the right to verify the requesters identification by asking for Photo ID. If this proves insufficient then further ID may be required.

10. Data Protection Breaches

If you suspect that your or someone else's data has been subject to unauthorised or unlawful processing, accidental loss, destruction or damage, we ask that you contact Richard Lane, Director of Finance & Operations (email: rlane@twyfordacademies.org.uk, phone: 020 3301 3189) and advise us without undue delay.

11. 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.

To make a complaint, please contact our independent data protection officer Claire Mehegan at the London Diocesan Board for Schools (claire.mehegan@london.anglican.org).

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

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

12. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact either our School Data Protection Lead, Richard Lane, Director of Finance & Operations (email: rlane@twyfordacademies.org.uk, phone: 020 3301 3189) or our independent Data Protection Officer, Claire Mehegan at the London Diocesan Board for Schools (claire.mehegan@london.anglican.org).