
Privacy Notice for Harris Federation Teaching School Alliance (HFTSA)

(Applicants and participants)

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1. Introduction

- 1.1 Under data protection law, individuals have a right to be informed about how Harris Federation use any personal data that is held about them. Harris Federation, complies with this right by providing **Privacy Notices** to individuals where it processes their personal data.
- 1.2 The Federation takes great care in ensuring a safe and secure application and professional development experience. The information you submit to the Federation via the Harris Federation Teaching School Alliance (HFTSA) website and social media channels is for the sole purpose of training opportunities with HFTSA and is only used for the purposes set out in this policy.

2. Document purpose

- 2.1 The purpose of this Privacy Notice is to explain how we, Harris Federation, collect, store and use personal data about individuals (programme applicants and participants), who are applying to undertake professional development.

3. Definitions

- 3.1 **Harris Federation Teaching School Alliance (HFTSA)** is part of the Harris Federation. It offers professional development opportunities for teachers, leaders and support staff working in schools and academies. HFTSA offers a range of professional development opportunities including the National Professional qualifications: NPQML, NPQSL, NPQH and NPQEL.
- 3.2 An **applicant** is deemed to be an individual seeking a place on one of HFTSA's professional development programmes, who may register interest in a programme(s), or complete an electronic form(s) as part of the application process. Applicants are required to complete mandatory requests for information as part of this process, and will remain an applicant until the formal commencement of the professional development programme.
- 3.3 A **participant** is deemed to be an individual who has successfully enrolled on one of HFTSA's professional development programmes e.g. the National Professional qualifications: NPQML, NPQSL, NPQH and NPQEL .

4. Data controller and processors

- 4.1 The Harris Federation is the **Data Controller** for the purposes of data protection law and will therefore determine the purposes for which personal data is processed (the 'why' and the 'how'). Our postal address is:

Harris Federation
4th Floor Norfolk House
Wellesley Road, Croydon
CR0 1LH

- 4.2 HFTSA, our academies and any authorised third parties e.g. Ofsted, the Department for Education and its quality assurance partner Serco, process and 'use' data on behalf of (under the supervision/control) the Federation and are therefore **Data Processors**.
- 4.3 Harris Federation 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 we hold

- 5.1 We process data relating to those we employ, or otherwise engage, to work or train at our academies. The nature of the personal data we collect depends on the programme you are applying for and the stage of the application process or training you reach.
- 5.2 Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not limited to:
- **Personal information**, including name, contact details, date of birth, email address and other personally identifiable data, which is required in order to process your training application.
 - **Characteristics**, such as race, ethnicity, nationality and sexual orientation.
 - **Qualifications and employment records**, including academic qualifications, work history, job titles, training records and professional memberships.
 - **Assessment and performance data**, such as assessment outcomes and data. This information is shared with external bodies such as the DfE and its quality assurance partner Serco etc. as required.
 - **Other**, including a copy of your national identity card or driving licence and passport type photograph.

6. Why we use this data

- 6.1 The purpose of processing induction data is to help the Federation and its academies select suitable participants for our professional development programmes. The personal information is used for various reasons, including to:
- facilitate our safeguarding obligations towards students;
 - enable ethnicity and disability monitoring;
 - fulfil contractual or statutory obligations with any third parties;
 - to answer any enquiries you may have during the application and induction processes;
 - to advise you of Federation news, updates, events, reports and other information. Where we do so, you will be able to unsubscribe from such communications.

7. Our lawful basis for using this data

- 7.1 We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:
- process your application to a professional development programme with HFTSA;
 - fulfil a contract we have entered into with you;
 - comply with any legal obligation, employment, social security and social protection law.
- 7.2 We may also use personal information about you where:
- you have given us consent to use it in a certain way e.g. safeguarding checks, reference requests and marketing.
- 7.3 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.
- 7.4 Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the Federation's use of your data.

8. Collecting this information

- 8.1 The personal information we collect about you comes primarily from applications or other forms you submit to Harris Federation, HFTSA and/or via a third party application process.
- 8.2 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. However, failure to provide some of the requested information may result in our being unable to carry out our application checks correctly and therefore impact on any subsequent training if statutory.
- 8.3 We will try to ensure that all information we hold about you is accurate, complete and up to date, but we expect you to help us in this regard by promptly notifying us if there are any changes to your personal information.

9. How we store this data

- 9.1 HFTSA, on behalf of the Federation, creates and maintains an individual personnel file for each applicant for as long as they remain on a programme. It is retained throughout the programme and beyond in the case of any delay to assessment, interruption or mitigating circumstances. The information contained in this file is kept secure and is only used for purposes directly relevant to your professional development, as appropriate.
- 9.2 Personal data will not be retained by the Federation for longer than is necessary in relation to the purpose for which it was collected. Lengths of data retention will vary depending on whether a participant successfully completes the training/programme, withdraws or takes an intentional break during training. Assessment data, for example, is retained for ongoing reporting purposes.
- 9.3 Once your association with the Federation has ended, we will retain this file and delete the information in it in accordance with our **Records Retention Policy**, which can be found on HarrisNet.

10. Data sharing

- 10.1 We will only share personal information about you with trusted external service providers (third parties) where the law and our policies allow us to do so e.g. safeguarding related information, or where we have your consent.
- 10.2 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.
- 10.3 We will never share your data with any third party for their own marketing purposes and we may release personal information to regulatory or law enforcement agencies, if they require us to do so.

11. Data usage

- 11.1 When you visit the HFTSA website (www.harristeachingschool.com) we may automatically collect information including:
 - **Information about your visit**, including the areas users access most frequently and which services users access the most (we only use such data in the aggregate form). This information helps us determine what is most beneficial for our users and how we can continually improve our online services to create a better overall experience for our users.

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- **Marketing profiling** to help us identify programmes which may be of interest to you. The information collected is stored and is used for aggregated and statistical reporting, and is not shared with anybody else.

11.2 Any information collected during the website records will be erased after six months, and any personally identifiable data entered will be marked and blanked out. This information cannot be used to identify you as an individual and none of the aggregate information collected will be shared outside of HFTSA.

11.3 If you receive emails from us we may use certain analytics tools to capture data such as when you open our email or click on any links or banners our email contains. This data helps us to gauge the effectiveness of our communications and marketing campaigns.

12. Cookies

12.1 Cookies are small text files that are placed on your electronic device to help our website provide a better user experience. Cookies are stored on your individual device and you have full control over their use. You may deactivate or restrict the transmission of cookies by changing the settings of your web browser. Cookies that are already stored may be deleted at any time. To find out more about cookies and how to manage or delete them, visit www.aboutcookies.org.uk.

12.2 If you choose to disable cookies, you may not be able to use all the features on our website. For more information please see our **Cookie, Tracking and Website Analytics Policy**.

13. Expression of Interest form (EOI)

13.1 As part the application process to a professional development programme, you will have the option of submitting your EOI via our website, or one of our partner organisations. EOIs will only be considered as a supporting document in an application for a professional development programme.

13.2 Your EOI will be stored securely and will only be accessible by the HFTSA team or selected individuals within our academies across the Federation.

14. Transferring data internationally

14.1 We will not as a rule transfer any of your data to any third party outside the European Economic Area (EEA). If such a situation did arise where this became a requirement we will give you the opportunity to withhold your consent to such a transfer.

14.2 If we do transfer your personal data to a third party outside the EEA, we will only do so if they have been deemed to provide an adequate level of protection for personal data by the European Commission.

15. Photographs and media

15.1 As part of Federation training activities, HFTSA may take photographs and allow external organisations to take photographs or film participants within our Academies. Participants will be made aware that this is happening and the context in which the photograph will be used.

15.2 The HFTSA will take photographs for its own use. Usually these will be unnamed and will generally be for internal HFTSA use, but may also include photographs for publication, such as:

- Photographs included in an HFTSA prospectus, brochure or newsletter.
- Photographs to be used on display boards, which can be seen by visitors to the HFTSA activity.

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- Photographs posted on the HFTSA official website, Twitter and Facebook sites. Such sites can be accessed by the public and will therefore be closely monitored by HFTSA staff to ensure they are appropriate.

15.3 When a photograph intended for publication is taken, participants will be informed that a photograph is being taken and told what it is for so they can object if they so wish.

15.4 Named photographs will be used for internal use where there is a clear lawful basis for doing so e.g. ID photographs, which will be shared with our partner schools for safeguarding, access and identification purposes.

15.5 For all other purposes, if HFTSA wants to use named photographs it will obtain specific participant consent first e.g. consent will be sought if the intention is to use a participant's photograph on an external third-party social media site, such as LinkedIn.

16. CCTV

16.1 At Federation Head Office and at our academies CCTV is operated on site. This is considered necessary to protect staff, trainees and students' safety and/or Federation property.

17. Other websites

17.1 Please note that clicking on links and banner advertisements may result in your transferral to another website where data privacy practices may be different to that of the Harris Federation. Visitors should consult the other websites' privacy policies as we are not responsible for, and have no control over, information that is submitted to or collected by these third parties.

18. Your rights - how to access personal information we hold about you

18.1 Under data protection laws, individuals have a right to ask the Federation (via HFTSA) for a copy of the information we hold about you. As part of this process we may ask you to verify your identity and ask for more specific information about your request. Where we are legally permitted to do so, we may refuse your request and will give you reasons for doing so.

18.2 Individuals also have other rights regarding how their personal data is used and kept safe. These include having the right to:

- object to the use of your personal data if it would cause, or is causing, damage or distress;
- prevent your data being used to send direct marketing;
- 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);
- have inaccurate personal data corrected, deleted or destroyed, or restrict processing, in certain circumstances.

18.3 To exercise any of these rights, please contact the Harris Federation **Data Protection Officer (DPO)**. Contact details can be found in section 21.

19. Equal Opportunities

19.1 Harris Federation is an equal opportunities employer and an organisation committed to diversity. This means that all applicants and trainees will receive equal treatment and we will not discriminate on grounds of gender, marital status, race, ethnic origin, colour, nationality, national origin, disability, sexual orientation, religion or age.

19.2 As part of our commitment to equal opportunities we may from time-to-time use information provided by you for the purposes of diversity monitoring. All such information will be used on an anonymised basis.

20. Complaints

20.1 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.

20.2 Alternatively, you can make 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.

21. Contact details

21.1 If you have any questions, concerns or would like more information about anything mentioned in this Privacy Notice please contact our DPO, details below:

Data Protection Officer, Harris Federation
dpo@harrisfederation.org.uk

Harris Federation

