

## **Yorkshire Leadership Community Privacy Notice**



The Yorkshire Leadership Community (hereafter YLC) is a collaboration between several Yorkshire Teaching School Alliances (primary, secondary and special) in partnership with a number of regional Local Authorities, the Y & H Diversity Steering Group and the University of Leeds. Yorkshire Leadership Community is a subsidiary Red Kite Learning Trust (hereafter RKLT)

The Red Kite Learning Trust (RKLT) is the Data Controller of the personal information you provide to us. This means the RKLT determines the purposes for which, and the manner in which, any personal data relating to delegates, enquirers, contractors, employees and YLC partners.

In some cases, your data will be outsourced to a third party processor who provides a service to us. Where the YLC outsources data to a third party processor, the same data protection standards that the YLC upholds are imposed on the processor.

Mr David Noble is the Data Protection Officer. His role is to oversee and monitor the school's data protection procedures, and to ensure they are compliant with the GDPR. The Data Protection Officer can be contacted at: [DPO@rklt.co.uk](mailto:DPO@rklt.co.uk)

### **What is this Privacy Notice for?**

The notice sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the RKLT and the YLC. The aim of the notice is to give delegates, enquirers', contractors, employees and YLC partners an insight into how information about them is used by YLC.

## **Privacy Notice (How we use personal information)**

### **What information do we collect about you?**

We collect information about you when you register with us or place an order for products or services. We also collect information when you voluntarily complete customer surveys, provide feedback and use our online enquiry form. We also collect information on contractors and employees for the purposes of payments and legal processing of HMRC information. The information we collect on partners is used for communication and distributing information.

The categories of this information that we collect, process, hold and share include:

- Personal YLC delegate information (such as name, email address and workplace, DBS status for access to schools, photos, Teacher Reference Number TRN, date of birth, ethnicity, gender and disability)

- Contractor information (such as name, email address, premises address, phone number, DBS status, rates of pay, tax status)
- Employee information (such as name, email address, residence, contact number, DBS status, rates of pay, HMRC PAYE information, H&S records, divulged medical information, next of kin and absence information.)
- Enquirer information (such as name, email address, organisation, job title)
- Partner information (such as name, email address, organisation, job title, biographies, photos)

## **Why we collect and use this information**

We use delegate data to:

- Enable us to carry out specific functions for which we are responsible
- Evaluation with government departments if requested
- Email marketing if opted in – Via Mailchimp and Microsoft Outlook
- Derive statistics which inform decisions such as the funding of courses
- Assess performance of courses
- Attendance on courses
- Invoice for attendance

We use contractor and employee data to:

- Enable us to carry out specific functions for which we are responsible including safeguarding
- Sharing with required government departments if requested
- Produce annual accounts and PAYE/HMRC returns including payments
- Monitor performance

We use enquirer data to:

- Answer queries raised in enquiry
- Give information on our courses if consent has been given to receive this information

We use YLC partner data to:

- enable communication and distribute information about YLC

- provide on-line biographies of our partners on our website

## How will we use the information about you?

We collect information about you to process your order, manage your account and, if you agree, to email you about other products and services we think may be of interest to you. Registers and email addresses are kept for up to 7 years after last attendance on a course.

We use your information collected from the courses to personalise your repeat visits to our courses. YLC will not share your information for marketing purposes with external companies outside of the RKLIT unless required to do so in order for us to carry out specific functions for which we are responsible. In processing your order, we may send your details to, and also use information from your workplace to complete your course.

## Data sharing security

To be granted access to personal information, organisations must comply with GDPR strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

We will not without your express consent provide your personal information to any third parties for the purpose of direct marketing.

For more information on how the DfE collects and share data, follow the link below:

<https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>

To contact DfE: <https://www.gov.uk/contact-dfe>

NPQ participants must also refer to the document ***Information sharing for the purposes of the National Professional Qualification (NPQ) programme*** for information on;

- what data will be collected
- why data is being shared with DfE
- other opportunities to contribute to the evaluation
- what makes it lawful to collect and share the data with DfE.
- how this affects you
- security and confidentiality information
- contact details for further information

The document can be found here;

<https://www.yorksleadership.co.uk/privacy-policy/>

## Marketing

We would like to send you information about products and services of ours which may be of interest to you. If you have consented to receive marketing, you may opt out at a later date. You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please email [info@yorksleadership.co.uk](mailto:info@yorksleadership.co.uk) or use the unsubscribe link on the bottom of a e-newsletters.

## Mailchimp Privacy Notice

### Security

MailChimp participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S Privacy Shield Framework. We are committed to subjecting all Personal Information received from European Union (EU) member countries and Switzerland, respectively, in reliance on each Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Frameworks, and to view our certification, visit the U.S. Department of Commerce's Privacy Shield website: <https://www.privacyshield.gov/welcome>. A list of Privacy Shield participants is maintained by the Department of Commerce and is available at: <https://www.privacyshield.gov/list>.

### International transfers

MailChimp is responsible for the processing of Personal Information it receives under each Privacy Shield Framework and subsequently transfers to a third party acting as an agent on its behalf. We comply with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions. The European Commission (the "Commission") and the US Department of Commerce ("DOC") have agreed on a final EU-US "Privacy Shield" framework for use by companies seeking a legal basis for commercial transatlantic transfers of personal data. The Commission formally approved the "adequacy" of the Privacy Shield on 12 July 2016, and the DOC began accepting "self-certifications" from US organisations on 1 August 2016

## Our lawful basis for processing data

The lawful bases for processing are set out in Article 6 of the GDPR. At least one of these must apply whenever you process personal data:

- (a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
- (b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

(c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).

(d) Vital interests: the processing is necessary to protect someone's life.

(e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

(f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

We collect and use information under clause a – from registers and enquiries, b – from delegates buying into courses

## **Storing this information**

We hold delegate information for up to 7 years after the last attendance on a course. We hold employee and contractor information for tax purposes as per HMRC guidelines of 6 years after the current tax year. Enquiries, YLC partner information and photos are held for up to 7 years.

## **Requesting access to your personal data**

Under data protection legislation, all data subjects have the right to request access to information about them that we hold. To make a request for your personal information, contact [info@yorksleadership.co.uk](mailto:info@yorksleadership.co.uk)

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with the Headteacher or our Data Protection Officer: Mr David Noble at [DPO@rklt.co.uk](mailto:DPO@rklt.co.uk) in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## **Further information**

### **Other websites**

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

### **Data Protection Officer**

If you would like to discuss anything in this privacy notice, please contact our Data Protection Officer: Mr David Noble at [DPO@rklt.co.uk](mailto:DPO@rklt.co.uk)

Red Kite Learning Trust, Arthurs Ave, Harrogate HG2 0DZ, 01423 531127

### **Privacy Policy Changes**

Although most changes are likely to be minor, the Red Kite Learning Trust may change its Privacy Policy from time to time, and in the Red Kite Learning Trust's sole discretion.

### **Red Kite Learning Trust (RKLT)**

Red Kite Learning Trust is the data controller for Yorkshire Leadership Community. The RKLT can be contacted at:

Red Kite Learning Trust, Arthurs Ave, Harrogate HG2 0DZ, 01423 531127