



Privacy Notice HISP Learning Partnership

Facilitators

Table of Contents

1. Introduction	2
2. The personal data we hold	2
3. Why we use this data	2
3.1 Use of facilitators' personal data for marketing purposes	3
3.2 Use of facilitators' personal data in automated decision making and profiling.....	3
4. Our lawful basis for using this data.....	3
4.1 Our basis for using special category data.....	4
5. Collecting this data.....	4
6. How we store this data.....	5
7. Who we share data with.....	5
7.1 Transferring data internationally	6
8. Your rights	6
8.1 How to access personal information.....	6
9. Complaints.....	6
10. Contact us.....	7

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Privacy Notice – HISP Learning Partnership Facilitators

1. Introduction

Under UK data protection law, individuals have a right to be informed about how the HISP Multi Academy 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 the Trust's facilitators.

HISP also acts as a delivery partner for some of its delivery. As a delivery partner, some of our principal roles and responsibilities in training delivery is to:

- Select appropriately qualified and experienced facilitators to deliver sufficient high-quality training to meet the program objectives and participant needs
- Ensure facilitators attend central online induction and training delivered by leads
- Ensure sufficient facilitators are deployed to training events
- Provide all facilitators with development feedback at least once per cohort

HISP Multi Academy Trust is the 'data controller' for the purposes of UK data protection law.

Our Trust Data Protection Officer is Paul Goodwin (see 'Contact us' below).

2. The personal data we hold

The categories of facilitator information that we collect, hold, and share includes:

- Full name
- Contact details – email address (preferably a school email address) and contact number (preferably a school contact number)
- School name, URN, location, and Trust details
- Job title, phase of education and subject specialism area(s)
- Details of any other specialist areas of expertise

3. Why we use this data

We use your personal information to:

- Deploy sufficient facilitators to training events (e.g. taking into specific areas of expertise and or phase/subject specialism).
- Communicate directly with you via email (preferably) or telephone regarding facilitator deployment training events.
- Communicate directly with employing schools and or trusts regarding invoicing for payment for facilitators time.
- Enable us or delivery partners to contact you regarding central online induction and training sessions.
- Keep you informed of updates and to notify you of other relevant training opportunities to support you in your role as a facilitator.
- Assist you with your enquiries.

HISP Teaching School Hub

Privacy Notice – HISP Learning Partnership Facilitators

3.1 Use of facilitators' personal data for marketing purposes

Where consent has been given, we may send facilitators marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to them.

Consent can be withdrawn by 'opting out' of receiving these emails and/or texts 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 facilitators' 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

The main legal bases we rely on when we process personal information are as follows:

- It is necessary for us to perform a task which is in the public interest or to exercise our official duties as a Trust. This broad legal basis is applicable to almost all the processing we do involving personal data.
- It is necessary for compliance with a legal obligation. This is applicable where a specific law requires us to collect or share personal data (this usually involves pupil, employee or governor data). This will include sharing data with the Department for Education (DfE), Her Majesty's Revenue and Customs (HMRC) or HM Courts and Tribunal Service (e.g. following a court order).
- It is necessary for the performance of a contract. This will mainly be applicable when we enter into a contract with our employees, parents (for paid services) or with our service providers.
- The data subject has given their consent. Consent is not required for most of the processing we do, however, there are occasions when we ask for consent. For example, if we want to publish photographs or videos of pupils; collect pupil or employee fingerprints to provide them with access to our cashless catering or library systems; share data with other organisations or individuals where we are not legally required to share that data; send parents/carers electronic direct marketing or fundraising communications. Where we are processing your data with your consent, you have the right to withdraw that consent. If you change your mind, or if you are unhappy with our use of your personal data, please let us know by contacting the Trust office.
- The processing is necessary to protect the vital interests of the data subject or someone else. This is applicable where a person's life could be at risk and we need to share or make available information to help them. This could involve sharing serious allergy information with staff, paramedics or other medical professionals, or other information requested by the police or social services to assist them in their enquiries to protect that person.

HISP Teaching School Hub

Privacy Notice – HISP Learning Partnership Facilitators

- The processing is necessary for our legitimate interests or the legitimate interests of a third party. This is applicable where the processing is not required by law but is of clear benefit to the Trust or the data subject; there is limited privacy impact on individuals and the individual reasonably expects us to use their data in this way. This legal basis is not relied upon where the Trust is processing the data to perform its official tasks.

4.1 Our basis for using special category data

When we process ‘special category’ data, we must have another legal basis. Special category data is personal data which reveals a person’s racial or ethnic origin, political opinion, religious or philosophical beliefs, trade union membership, genetic data, biometric data (such as fingerprints), health, sex life or sexual orientation. The main legal bases we rely on when we process this type of data is as follows:

- The data subject has given explicit consent. This is usually applicable where we ask for health, dietary information or biometric data such as fingerprints.
- The processing is necessary for performing any right or obligation which is imposed on the Trust in relation to employment, social security and social protection law (e.g. safeguarding individuals at risk; protection against unlawful acts; prevention against fraud). This is usually applicable where we are performing our duties under employment related laws e.g. health and safety, equality or tax or where we have taken action to safeguard individuals at risk.
- It is necessary to protect the vital interests of any person where the data subject is physically or legally incapable of giving consent. This could be relied upon in situations where someone has become seriously ill on our premises and we are asked by medical practitioners (such as paramedics), to share information we know about that person’s health or allergies.
- The processing is necessary for the establishment, exercise or defence of legal claims. We may share or use special category data where legal action is being considered or underway.
- The processing is necessary in the substantial public interest. This may be relied upon in circumstances where our processing is necessary to safeguard children or others at risk or where we respond to requests from the Police or law enforcement bodies, to assist in an investigation to prevent or detect an unlawful act.
- The processing is necessary for the assessment of the working capacity of the employee. This will be applicable where an employee has been absent from work due to illness or injury, and we need to assess whether they are fit to return to work.

This list is not exhaustive.

5. Collecting this data

While the majority of information we collect is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information, we make it clear whether it must be provided (and if so, what the possible consequences are of not complying), or whether there is a choice.

Most of the data we hold will come from facilitators, but we may also hold data from:

HISP Teaching School Hub

Privacy Notice – HISP Learning Partnership Facilitators

- Other delivery partners
- Local authorities, schools and MATs
- Government departments or agencies
- Police forces, courts, tribunals

6. How we store this data

We keep personal information about facilitators while they are engaged with the program. We may also keep it beyond their engagement if this is necessary. Our record retention schedule sets out how long we keep information.

If you would like a copy of the school record retention schedule, please contact the Trust.

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

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

7. Who we share data with

We do not share information about facilitators with any third party without 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 facilitators with:

- Our Multi Academy Trust (HISP Multi Academy Trust)
- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Government departments or agencies
- Our regulator, Ofsted
- Financial organisations
- Our auditors
- Survey and research organisations
- Health authorities such as the NHS
- Security organisations
- Health and social welfare organisations such as the school nurse
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunal
- Schools or MAT's
- Delivery Partners

HISP Teaching School Hub

Privacy Notice – HISP Learning Partnership Facilitators

7.1 Transferring data internationally

We may share personal information about a facilitator with the following international third parties, where different data protection legislation applies:

- App or cloud server providers

Where we transfer your data to a third-party country or territory, we will do so in accordance with UK data protection law and on the basis of an adequacy regulation by the UK government.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

8. Your rights

8.1 How to access personal information

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

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

If you would like to make a request, 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

HISP Teaching School Hub

Privacy Notice – HISP Learning Partnership Facilitators

10. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact;

- Paul Goodwin, Data Protection Officer, HISP Multi Academy Trust, Winchester Road, Chandlers Ford, Hampshire, SO53 2DW. Email: info@hispmat.org