

## National Professional Qualifications (NPQ) - Privacy Notice

This privacy notice is provided by the National Society (Church of England and Church in Wales) for the Promotion of Education (operating as the Church of England Education Office) to explain what to expect when we collect and process your personal information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

### Data controller(s)

The data controller is:

National Society (Church of England and Church in Wales) for Promoting Education  
 (Operating as the Church of England Education Office and the Church of England Foundation for Educational Leadership)  
 Church House  
 Great Smith Street  
 London  
 SW1P 3AZ

For further information on the National Society please go to the following website:  
<https://www.churchofengland.org/about/leadership-and-governance/national-church-institutions>

For some elements of the information collected the Data Controller will be the Department of Education (DfE).

### 1. Why we collect and use your personal data

Personal information is collected for the following purpose/s:

- To administer the National Professional Qualification (NPQ) process
- To arrange the attendance of courses
- To quality assure the content delivery of the NPQ process
- To mark NPQ assignments.

### 2. The lawful basis for using your information

We collect and use personal data under the following lawful bases: Personal data

Data item	Reason for processing	Condition for processing
Alternative Email Address	To facilitate communications with the applicant/ participant	<b>UK GDPR Article 6(1)(b)</b> “processing is necessary...in order to take steps at the request of the data subject prior to entering into a contract” (agreeing to the terms and conditions of the NPQ course)
Current Position	Collected under the DfE requirements	<b>UK GDPR Article 6(1)(c)</b> “processing is necessary for compliance with a legal obligation to which the controller is subject and is shared

		and processed on the legal basis that the processing is necessary for the performance of a task in the public interest pursuant to Section 14 of the Education Act 2002. ”
Date of Birth	Collected under the DfE requirements	<b>UK GDPR Article 6(1)(c)</b> “processing is necessary for compliance with a legal obligation to which the controller is subject and is shared and processed on the legal basis that the processing is necessary for the performance of a task in the public interest pursuant to Section 14 of the Education Act 2002. ”
Employment status during course	In order to offer the applicant/participant an extended course duration if required	<b>UK GDPR Article 6(1)(b)</b> “processing is necessary...in order to take steps at the request of the data subject prior to entering into a contract” (agreeing to the terms and conditions of the NPQ course)
First Name	Used as an identifier	<b>UK GDPR Article 6(1)(b)</b> “processing is necessary...in order to take steps at the request of the data subject prior to entering into a contract” (agreeing to the terms and conditions of the NPQ course)
If not eligible for scholarship funding, please identify method of funding	To support the course funding process	<b>UK GDPR Article 6(1)(b)</b> “processing is necessary...in order to take steps at the request of the data subject prior to entering into a contract” (agreeing to the terms and conditions of the NPQ course)
Name preference (if applicable)	To facilitate communication with the applicant/participant	<b>UK GDPR Article 6(1)(b)</b> “processing is necessary...in order to take steps at the request of the data subject prior to entering into a contract” (agreeing to the terms and conditions of the NPQ course)
Personal Telephone Number	To facilitate communication with the applicant/participant	<b>UK GDPR Article 6(1)(b)</b> “processing is necessary...in order to take steps at the request of the data subject prior to entering into a contract” (agreeing to the terms and conditions of the NPQ course)
Previous Name (if applicable)	To identify if the applicant/participant has previously undertaken any courses so their records can be linked.	<b>UK GDPR Article 6(1)(b)</b> “processing is necessary...in order to take steps at the request of the data subject prior to entering into a contract” (agreeing to the terms and conditions of the NPQ course)
Primary Email Address	To facilitate communication with the applicant/participant	<b>UK GDPR Article 6(1)(b)</b> “processing is necessary...in order to take steps at the request of the data subject prior to entering into a contract” (agreeing to the terms and conditions of the NPQ course)
Surname	Used as an identifier	<b>UK GDPR Article 6(1)(b)</b> “processing is necessary...in order to take steps at the request of the data subject prior to entering into a contract” (agreeing to the terms and conditions of the NPQ course)

Teacher Reference Number (TRN)	Used as an identifier	<b>UK GDPR Article 6(1)(c)</b> “processing is necessary for compliance with a legal obligation to which the controller is subject and is shared and processed on the legal basis that the processing is necessary for the performance of a task in the public interest pursuant to Section 14 of the Education Act 2002.”
Title	To ensure that the applicant/participant is correctly addressed appropriately	<b>UK GDPR Article 6(1)(b)</b> “processing is necessary...in order to take steps at the request of the data subject prior to entering into a contract” (agreeing to the terms and conditions of the NPQ course)
Time in Current Role	We are interested in this to analyse in the future to build a profile of the type of leader who is completing each programme. This is not essential though.	<b>UK GDPR Article 6(1)(f)</b> “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.” See <i>Legitimate Interests section below</i> .
Which course are you applying for?	To ensure the applicant/participant is provided with the correct training	<b>UK GDPR Article 6(1)(b)</b> “processing is necessary...in order to take steps at the request of the data subject prior to entering into a contract” (agreeing to the terms and conditions of the NPQ course)
Which region are you in?	To confirm that they are based in England and to assign the applicant/participant to the relevant local regional group.	<b>UK GDPR Article 6(1)(b)</b> “processing is necessary...in order to take steps at the request of the data subject prior to entering into a contract” (agreeing to the terms and conditions of the NPQ course)
Work Telephone Number	To facilitate communication with the applicant/participant	<b>UK GDPR Article 6(1)(b)</b> “processing is necessary...in order to take steps at the request of the data subject prior to entering into a contract” (agreeing to the terms and conditions of the NPQ course)

### Special categories

Data item	Reason for processing	Condition for processing
Disability/Accessibility requirements	To ensure that the needs and requirements of the applicant/participant are met so that they can attend the course with no issues and are not discriminated against as a result.	<b>UK GDPR Article 6(1)(b)</b> “processing is necessary...in order to take steps at the request of the data subject prior to entering into a contract” (agreeing to the terms and conditions of the NPQ course)  <b>UK GDPR Article 9(2)(f)</b> “processing is necessary for the establishment, exercise or defence of legal claims...”
Dietary requirements	To ensure that when on the courses the applicant is not provided with any food containing any ingredients that will result in illness to the applicant/participant	<b>UK GDPR Article 6(1)(d)</b> “processing is necessary in order to protect the vital interests of the data subject.”  <b>UK GDPR Article 9(2)(c)</b> “processing is necessary to protect the vital interests of the data subject”

<p>Ethnicity</p>	<p>To take positive action to enable or encourage those with a protected characteristic/s which are disproportionately low in educational senior leadership positions</p>	<p><b>Public task (Article 6(1)(e))</b> We process ethnicity data in order to take positive action to enable or encourage those with a protected characteristic(s) which are disproportionately low in educational senior leadership positions to participate in accordance with the Equality Act 2010 (Chapter 2 Paragraph 158(1)(c) Positive Action.</p> <p><b>Substantial Public Interest (Article 9(2)(g))</b> We will process ethnic origin data in accordance with Schedule 1, Part 2 of the Data Protection Act 2018 paragraph 8(1)(a) and (b) and paragraph 8(2):</p> <p>Equality of opportunity or treatment for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained, <b>OR</b> Schedule 1, Part 2 of the Data Protection Act 2018 paragraph 9(1), for the purposes of promoting or maintaining diversity in the racial and ethnic origins of individuals who hold senior positions in schools.</p>
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### Legitimate Interests Assessment

Because we consider that we have a legitimate interest in processing your personal data, we have undertaken a Legitimate Interests Assessment which sets out why we consider such processing is justified.

<i>We have a specific purpose with a defined benefit.</i>	The data will be obtained for statistical purposes to ensure the positive development of future courses.
<i>The processing is necessary to achieve the defined benefit.</i>	The statistical data will deliver more tailored courses in the future, of which the data subject may benefit.
<i>The processing legitimately overrides the interests of the data subject and any risks to their rights or freedoms.</i>	With the controls and subsequent anonymisation of the data, the rights and freedoms of the data subject will be protected.

For a copy of the full Legitimate Interests Assessment, please contact Grace Loughran whose contact details are set out in section 7 below.

### **3. Who we share your information with:**

We will not share your data with any other third parties except where specified here. We will be sharing your information with:

- Department for Education
- External Assessment Providers (University of Roehampton, Marjon University & Leeds Trinity)
- Church of England Diocesan Education Teams
- Your data will be stored on a third-party system – Salesforce (Customer Relationship Management System)
- Your data will be stored on a third-party system – Blackboard (Learning Management System)

Recordings of coaching sessions will only be accessible by the National Society, for the purposes of quality assuring the content and delivery of those sessions.

### **4. Your personal data will not be sent to countries outside the UK/EEA.**

All applicant information will be retained on systems that are held within the UK/EEA that are compliant with the current UK/EU GDPR requirements.

### **5. How long do we keep your information?**

We will keep your data for 6 years.

### **6. Your rights**

You have the following rights regarding your personal data:

- The right to be informed about any data we hold about you;
- The right to request a copy of your personal data which we hold about you;
- The right to withdraw your consent at any time (if applicable);

- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for us to retain such data;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of your personal data (if applicable).

To exercise these rights, please contact the Data Protection Team using the contact information provided below. The NCIs Individual Rights Policy is available on request.

## 7. Complaints or concerns

If you have any queries regarding this processing activity, please contact, in the first instance, **Grace Loughran, Operations Manager via [grace.loughran@churchofengland.org](mailto:grace.loughran@churchofengland.org)**.

If you have any concerns or queries about how the National Society handle your personal data, please contact the Data Protection Officer at:

**[gdpr@churchofengland.org](mailto:gdpr@churchofengland.org)**

or online at: **<https://www.churchofengland.org/terms-and-conditions/national-church-institutions-data-protection>** or Tel: 020 7898 1030.

You have the right to make a complaint at any time to the Information Commissioner online at: **<https://ico.org.uk/make-a-complaint/your-personal-information-concerns/>** or by phone on 0303 123 1113 (local rate).