



Proud to
be part of the
Nene
Education
Trust

Privacy Notice

The Purpose of this Notice

This Statement describes how we collect and use personal data about you, in accordance with the UK General Data Protection Regulation (GDPR) the Data Protection Act 2018 and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK ('Data Protection Legislation'). Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

Under UK data protection law, individuals have a right to be informed about how 5 Wells uses any personal data held about them. We comply with this right by providing 'privacy notices' to individuals. This privacy notice explains how we collect, store and use personal data about those accessing our offer.

About Us

5 Wells Development Centre is a training and support delivery provider engaging with schools and other organisations predominantly within Northamptonshire. 5 Wells is the organisation responsible for the storage and processing of your personal information (or personal data). This means 5 Wells is called the Data Controller registered with Information Commissioners Office (ICO), registration number ZA185201. The Development Centre who are part of the Nene Education Trust and is located at Nene Business Centre.

Our postal address

5 Wells Development Centre
Nene Business Centre
Waterside House
Station Road, Irthlingborough
Northamptonshire NN9 5QF

Tel No: 01933 400549

Email us at enquiries@5Wells.org.uk

The personal data we hold about you upon booking training

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

-  Your name
-  Your school email address
-  The name of your school (address, email and telephone numbers)
-  Finance contact at school
-  Finance contact email address for invoicing purposes

We may also collect, use and store information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- 5W Any dietary requirements where catering is provided
- 5W Any disabilities that we would need to consider in order for you to access the training (for example, First Aid training)

Where we are acting in partnership with organisations such as Department for Education, Universities, Teaching School Hubs (for example)

The details that 5 Wells may access from the partnership may include, but are not limited to, the following:

- Your contact details and other information submitted during the application process.
- Medical information (where applicable) including information about any disabilities or health conditions you have, data about your gender.
- Information about previous qualifications
- Any communications you have with us, and any communications we generate about you

When do we collect information?

- 5W We collect information when you register a booking on our website or contact us to ask us to make a booking on your behalf for training delivered directly by 5 Wells.
- 5W Where we are acting in conjunction with Delivery Partner (such as Northamptonshire Teaching School Hub or London Metropolitan University) this information will come from third parties, such as the Department for Education.

Why we use this data

We use this data to:

- 5W Communicate details of annual events; updated and refresher training
- 5W Meet legal requirements and legitimate interests
- 5W Track how well the business as a whole is performing
- 5W Assess the quality of our services following evaluation of any training
- 5W Comply with our delivery partner contractual obligations
- 5W Record visitors to our site for safety purposes

The lawful basis for using this data

The lawful basis will be dependent upon the type of programme/training delivered and will either be contract, consent or legal obligation.

We collect and use personal information for the purposes of where:

- 5W you are entering or have entered into a contract with us
- 5W it is necessary to protect someone in an emergency
- 5W it is required by law
- 5W you have made your information publicly available
- 5W it is necessary for legal cases
- 5W it is necessary for archiving, research, or statistical purposes

Use of your personal information for refresher training notifications

When a certificate expires, we may contact you to advise that refresher training is available.

Our basis for using special category data

We only collect special category data when we have a lawful basis, as set out above, and one of the following conditions for processing as set out in data protection law:

- 5W We have obtained your explicit consent to use your personal data in a certain way
- 5W We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- 5W We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- 5W The data concerned has already been made manifestly public by you
- 5W We need to process it for the establishment or defence of legal claims
- 5W We need to process it for reasons of substantial public interest as defined in legislation
- 5W We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- 5W We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

Collecting this information

While the majority of information we collect about Development Centre delegates is mandatory, there is some information that 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.

Data Retention and Storage

We do not retain your personal data for longer than is required in order to provide you with relevant information or services unless you request us to do otherwise.

We keep personal information about delegates held securely electronically securely on site and retain your personal information for 30 days after ceasing any activity with us. If completing a programme of training (eg ECF or NPQ) your personal data will for the duration of the programme.

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

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

Our website is scanned on a regular basis for security holes and known vulnerabilities. The website is the only "client" which has access to the database upon which your data is stored and uses strong username and password methods. As such, access to data within the database is highly restricted and security is seen to be very robust.

Data sharing

Information will be shared dependent upon the type of programme/training delivered to our partners.

We do not share information about delegates 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 you:

-  Our auditors
-  Police forces, courts, tribunals

Third party disclosure

We do not sell, trade, or otherwise transfer to outside parties, your personally identifiable information.

Individual rights regarding your data

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

-  The right to be informed (Subject Access Request)
-  The right of access
-  The right to rectification
-  The right to erasure
-  The right to restrict processing
-  The right to data portability
-  The right to object

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

For further detail, please see the Nene Education Trust Data Protection Policy. To exercise any of these rights, please contact us (see 'Contact us' below).

Complaints

We take any complaints about the 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 Data Protection Officer, details below.

Alternatively, you can make a complaint to the Information Commissioners Office:

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

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer:

Angela Corbyn on 07775 436141; or email dpo@neneeducationtrust.org.uk; or leave a letter at our offices at the address above.

Nene Education Trust GDPR queries, please contact –

Victoria Brennan on 01933 400549 or email vbrennan@neneeducationtrust.org.uk