

Privacy Notice

Effective: 1 September 2021

Welcome to the Redhill College of Leadership and Development (RCLD) Privacy Notice

The Redhill College of Leadership and Development is a provider of Continuous Professional Development, as part of the Redhill Academy Trust. We provide training courses, networking and improvement services, in the primary, secondary and operational education sector. Training is delivered in person, virtually and via online resources, along with a wide range of supporting resources and articles via our Trust website www.redhillacademytrust.org.uk

In everything we do RCLD respects your privacy and is committed to protecting your personal data. RCLD complies with all UK GDPR requirements and adheres to the following policies of the Redhill Academy Trust, where appropriate.

- Data Protection Policy
- Data Acceptable Use Policy
- Data Retention Policy

The Redhill Academy Trust is the data controller for all the data processed by RCLD.

We do not knowingly collect data from children.

This privacy notice supplements the other privacy notices of the Redhill Academy Trust and its Academies and is not intended to override them.

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice explains how and why we process (collect, use, retain and share) the personal data of everyone who RCLD interacts with:

- our customers – whether buying for yourself or others;
- our learners - including those who purchase the courses themselves or who have been provided access to it by another e.g. their employer or organisation;
- those who interact with us through our websites;
- our suppliers and contractors;
- visitors to our premises.

It also explains all of your rights in relation to your personal data including how to contact us or the supervisory authorities in the event you have a complaint.

If you have any concerns about this notice or any questions about RCLD processing of data please contact ourselves or the Redhill Academy Trust Data Protection Officer on the details at the bottom of this document.

THE DATA WE COLLECT ABOUT YOU

We collect a variety of information about people who interact with us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

For our learners we need to collect your name, email address and if you require us to send a paper copy of your certificate we will need a postal address. Optionally, you can provide your phone number. We may also be required, to process photo ID and previous qualifications for verification purposes.

Learners will be asked to create an account with our booking provider and this requires you to provide a username and secure password.

For people who purchase a course from us (including those who purchase for others) we need to process your name; email address; telephone number and data that allows us to process your order such as courses and quantities required, billing/invoice address and payment details.

For people who supply us with goods and services, we need to collect and process your name, contact information and bank details or payment methods.

For people who visit our offices: we may collect your name and contact details. Our office operates CCTV for the prevention of crime so when visiting us your image will be stored in our CCTV system and held for a period of time detailed in the CCTV policy in place at the location you visited.

For those who sign up to our marketing information, will need to collect and process your name, email address and postal address.

Those who interact with us on social media RCLD do not take any data outside of social media platforms on which you make contact with us unless you have asked us to do so – for example when answering learner queries raised through Facebook or you have indicated through LinkedIn that you would like to receive communications from us. We do use your social media username or profile to re-tweet you for example but this remains within the social media platform itself.

For more information about our use of social media see section below.

WHEN IS YOUR PERSONAL DATA COLLECTED?

There are various points of contact when RCLD needs to process personal data. When you:

- purchase and/or take our training courses;
- contact us for help;
- create an account on our booking provider;
- subscribe to our service or publications;
- request marketing materials to be sent to you;
- contact us through social media platforms or request subscriptions through these services;
- are involved in one of our customer surveys or focus groups;
- provide us with feedback;

When we enter into a contract with our suppliers, contractors and advisers (including steps at your request before entering into a contract).

We use instant messaging systems where customers or learners ask us to do so or where we re-tweet or re-post information within social media platforms.

We collect limited data at the time of payment:

- If you pay us by BACS or Cheque we will securely record your account name, payment reference and amount against your order in our accounting systems.
- If we pay you by BACS (in the event of a refund or payment to a supplier) we will need to receive your account name, sort code, account number and payment amount.
- All payments by credit/debit card are handled securely by third party providers to ensure RCLD does not receive any sensitive payment data.

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when there is a lawful and legitimate reason for doing so.

We use your personal data for the following reasons:

- Where we need to perform the contract (including pre contract negotiations) for example when you buy or take one of our training courses or where we buy services or supplies to enable us to run our business.
- Where we need to comply with a legal or regulatory obligation for example where we retain data for HMRC reporting purposes.
- When you give us your consent for example when you subscribe to our newsletters, updates or marketing. As a learning provider RCLD is always looking to learn from our customers so where a customer has consented to be involved in market research or customer focus groups we will engage with them so that our range of courses is up to date including the views from the perspective of those who use them.

MARKETING AND PROMOTIONAL COMMUNICATIONS

As described above we do undertake marketing to subscribers; customers and those who have opted in. You have the right to opt out of receiving promotional communications at any time by:

- contacting us at office@RCLD.org.uk
- using the 'unsubscribe' link in our emails;

Where you have unsubscribed from our email updates or where you ask us to stop sending promotional or other offers this will not affect any other interaction you have with RCLD – for example we will continue to send course renewal reminders at the appropriate time.

We do not process data for any other party nor do we sell data to any third parties for direct marketing purposes.

WEBSITE AND THIRD-PARTY LINKS

Our website includes links to third-party websites, plug-ins and applications. If you access other websites using the links provided, the operators of these websites may collect information from you which will be used by them in accordance with their own privacy policies, which may differ from ours. Therefore, if you use these links to leave our Site and visit websites operated by third parties, we cannot be responsible for the protection and privacy of any information that you provide to them. Please check these policies before you submit any personal data to these websites.

SOCIAL MEDIA

Information or comments you post or disclose on RCLD's social media platforms (for example, Facebook, LinkedIn, Twitter, or other social media applications) is public and will be treated as such for the purposes of this notice and RCLD's use of that data. RCLD cannot control the use of information disclosed in such platforms. You should always take care and exercise caution when posting or disclosing information in public spaces, this includes personal information or data. Content posted in RCLD's social media pages, including advice and opinions, represents the views of the individuals who post that content and such individuals bear sole and exclusive responsibility for the posting of that content. RCLD does not necessarily endorse, support, verify, or agree with any content posted on our social media pages and forums.

WHO WE SHARE YOUR DATA WITH

It may be necessary to share your information with our contractors and sub-contractors so they can provide a service to you or to enable us to deliver our courses and other learning resources. The contractors and sub-contractors are contractually required to ensure that they adhere to the security requirements imposed by the Data Protection Act and/or the UK General Data Protection Regulation;

Our contractors and sub-contractors will not share your information with any other parties (except where expressly agreed in writing with RCLD) and will only be able to use the information when completing work on behalf of RCLD.

In certain circumstances we may also need to share your personal data if we are under a duty to disclose or share personal data in order to comply with any legal obligation.

SECURITY AND YOUR PERSONAL INFORMATION

We know how much data security matters to all our customers and everyone we interact with. With this in mind, we will treat your data with the utmost care and take all appropriate steps to protect it. The information that you provide is stored securely whether it be digital or physical.

Across all of our business we have appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We secure access to all transactional areas of our websites and apps using 'https' technology and all payment transactions are encrypted (using SSL technology) – payments are handled securely under contract by external providers such as PayPal/SagePay through our booking provider.

All our IT systems are hosted in secure facilities.

- Access to your personal data is password-protected, and any sensitive data is protected through appropriate use of encryption technologies.
- All systems are password protected which expect strong passwords and require regular changes.
- We continually maintain firewalls, malware and anti-virus software.
- We maintain and monitor systems which alert RCLD to any potential data attack.
- Any data which is accessed off site or on a mobile device is kept on devices which require secure password access and are kept locked when not in use and never left unattended.

- We monitor our systems for possible vulnerabilities and attacks, and we carry out random penetration testing to identify ways to further strengthen security.
- Any documentation retained in paper form is kept in our offices which are access controlled and secure at all times. All paper documents are access protected.
- Only relevant members of staff will have access to the information you provide to us.
- All members of staff receive appropriate data protection training at induction and it is refreshed annually to ensure each is aware of their data responsibilities. Further each is aware that any breach of our data protection policy could result in a breach of their contract of employment and could result in disciplinary action and potentially dismissal.
- Our offices are protected by security and CCTV in order to prevent any criminal offence or threat to data security.
- We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
- These measures and procedures are audited and reviewed regularly.

HOW LONG WILL YOU USE MY PERSONAL DATA FOR

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, this includes our obligation as a learning provider, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We currently:

- retain the learners' data for the lifetime of the learner so that the training records or certificates are available to them at any time in the future or if we are required to provide evidence of training in the event of a legal request.
- Retain the partner organisations data for the lifetime of the agreement.
- we retain limited financial information which includes personal data for 7 years to satisfy HMRC regulations.

YOUR RIGHTS

Access	The right to be provided with a copy of your personal information (the right of access).
Rectification	The right to require us to correct any mistakes in your personal information.
To be forgotten	The right to require us to delete your personal information—in certain situations.
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, eg if you contest the accuracy of the data.

Access The right to be provided with a copy of your personal information (the right of access).

Data Portability The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations.

To object The right to object:
--at any time to your personal information being processed for direct marketing (including profiling);
--in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests.

Not to be subject to automated individual decision making The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the UK General Data Protection Regulation

If you would like to exercise any of those rights, please email, call or write to us at Redhill College of Leadership and Development, The Redhill Academy, Redhill Road, Arnold, Nottingham NG5 8GX.

HOW TO COMPLAIN

We hope that we can resolve any query or concern you may raise about our use of your information in the first instance. However, if you are not happy with how your concern has been dealt with you can contact the Redhill Academy Trust Data Protection Officer at DPO@redhillacademytrust.org.uk

The UK GDPR also gives you the right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

CHANGES TO THIS PRIVACY POLICY

This privacy notice was published on 01/09/2021 and last updated on 22/09/2022.

We may change this privacy notice from time to time—when we do we will inform you via our website.

HOW TO CONTACT US

Please contact us or our Data Protection Officer by post, email or telephone if you have any questions about this privacy notice or the information we hold about you.

Redhill College of Leadership and Development

Data Protection Officer

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