

NPW Group Privacy Notice

This privacy notice explains how we collect, store and use personal data about individuals we employ or otherwise engage with.

Who we are?

The NPW Group comprises Newham Partnership Working (NPW) and The Education Space. Both Companies run and commission education support services. Each company is a separate legal entity and will jointly determine the purpose and means of processing of your personal data and therefore are joint controllers as defined in Article 26 of The UK General Data Protection Regulation (UK GDPR).

Our address is Boardman House (3rd Floor), 64 Broadway, London E15 1NT

Our data protection officer is contactable at dpo@theeducationspace.co.uk

What do we collect?

We process data relating to those we employ or otherwise engage with. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Name and contact details including telephone numbers and email addresses
- Date of birth, marital status and gender
- Role
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information
- Outcomes of any HR related matter e.g disciplinary, grievance procedures e.t.c
- Absence data
- Driving licence details
- Photographs
- CCTV footage
- Teacher reference number
- Details of governing board memberships including application and nomination details
- Details of attendance training courses and development activities attended

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This may include information about:

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Health, including any medical conditions, sickness records and disabilities

Further information regarding special category data is recorded within the Appropriate Policy Document which is available on request.

Why do we collect this data?

The purpose of processing this data is to allow us to operate, comply with any legal obligations and to provide services to education establishments and other organisations. This may include:

- Enabling you to be paid
- Facilitate safer recruitment practices as part of our safeguarding obligations towards pupils
- Support effective performance management
- Inform our HR recruitment and retention policies
- Enable ethnicity and disability monitoring
- To provide you with appropriate information about job opportunities or recruitment events that might be of interest to you
- Providing you with appropriate information about your duties as a governor
- To provide you with information, training and development opportunities that might be of interest to you
- The provision and administration of training courses
- To support organisations with disputes and grievance procedures

Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. One of the following will apply:

- To fulfil a contract we have entered into with you
- To comply with a legal obligation, for example the Equalities Act 2010
- You have given us consent to use your personal data in a certain way
- To protect your vital interests (or someone else's vital interests)
- We have legitimate interests in processing the personal data – for example, where you have applied for a job and we retain your application for use with queries and talent pooling

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap and there may be several grounds which justify our use of your data.

Who do we share your personal data with?

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- Central and Local Government – to meet our legal obligations to share certain information, such as safeguarding concerns and information about staff performance and dismissals
- The Department for Education
- Your family or representatives
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll
- Financial organisations such as the Student Loans Company, Teachers pension and Pension service providers
- Our auditors
- Trade unions and associations
- Health authorities
- Security organisations
- Health and social welfare organisations

- Professional advisers and consultants
- Police forces, courts, tribunals
- Professional bodies
- Employment and recruitment agencies
- Training delivery partners

How long do we keep your personal data?

Your personal data will be retained in line with our retention policy, details of which are available on request.

We will retain your information only for as long as is necessary for the purposes set out in this notice. We will use your information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your information to comply with the law), resolve disputes, and enforce our agreements.

Transferring data internationally

Where we transfer personal data to a country or territory outside the United Kingdom, we will do so in accordance with data protection law.

Your rights

How to access personal information we hold about you.

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

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

- 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
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our data protection officer.

Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

COVID-19 Pandemic

During the COVID19 pandemic we may also collect and hold additional information in relation to the unprecedented challenges we are all facing during the Coronavirus pandemic (COVID-19).

The NPW Group may seek to collect and process your personal data in response to the current pandemic, which is above and beyond what would ordinarily be collected from its staff and their dependents, to ensure their safety and well-being.

Such information will be limited to what is proportionate and necessary, taking into account the latest guidance issued by the Government and health professionals, in order to manage and contain the virus. It will enable the company to effectively fulfil our functions to keep people safe, put contingency plans into place to safeguard those vulnerable and aid continuity of working life.

Where the information is to be used to make organisational decisions, steps will be taken to anonymise the data and general statistics/numbers used, wherever possible.

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.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's 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:

dpo@theeducationspace.co.uk