



# Privacy Notice for School Staff

## About us

We are a charity registered with The Charity Commission in England and Wales under registration number 1147771, and with the Office of the Scottish Charity Regulator (OSCR) in Scotland under SC048774. We are also a company limited by guarantee in England and Wales under registration number 7986971. Our registered office is at 17th Floor, Millbank Tower, 21-24 Millbank, SW1P 4QP.

We will only use your personal data in accordance with this policy and will comply with current data protection laws at all times.

## Why are you receiving this privacy notice?

Your school is taking part in the Scholars Programme ('the Programme') run by The Brilliant Club. You are receiving this privacy notice because you have been designated as part of the team delivering the Programme in your school.

To deliver and evaluate the Programme, we will need some personal data about you. This privacy notice describes how we will collect and use this personal data.

This privacy information is valid for the academic year within which it is given.

Note that a separate privacy notice for pupils and their parents/guardians will be shared with parents/guardians as part of the consent form sent to them for their data collection.

## Why are we collecting personal data?

In order to effectively run the Programme within your school, we will need to collect certain information from you in order to facilitate the arrangements and the communication between us and to process and evaluate, improve and promote the Programme.

Collecting the information will allow us to register pupils and enable the safe and effective administration of the Programme.

## What personal data about school staff is being collected?

The Brilliant Club will collect, store, and use the following categories of personal information about you.

From each participating school, the following will be collected:

- The Headteacher name and contact details
- Name, job title and contact details of the school's key contact
- Name, job title and contact details of the school's SLT contact (if not the key contact above)
- Name, job title and contact details of any staff accompanying pupils on trips
- Name Job title and contact details of the school's safeguarding lead
- Name, Job title and contact details of the school's data manager
- Name, Job title and contact details of the school's finance contact
- Prayer room requirements may be taken should any of your staff require these resources while accompanying pupils on trips.
- Dietary / Allergy information may be obtained from staff if The Brilliant Club are providing food on trips

## Who is responsible for deciding how your information is processed?

The Brilliant Club is an independent controller of the data collected for the Programme. We decide how and what data will be collected and used.

## What do we do with the information about you?

The data we collect from school about the people listed above will be used for all future communications between the school, and to collect pupil level data and schedule tutoring sessions for individual pupils. It will also be used to arrange trips for the pupils.

Outcomes from the Programme will be used in reports but no individuals will be referred to in these reports.

No decisions are taken about individuals as part of the programme and there is no automated processing of your personal data.

## What is the legal basis for these activities?

To make the use of your data lawful, The Brilliant Club has identified specific grounds, known as legal basis, for its processing. The legal basis available depends on the type of organisation so we have listed two below.

The Brilliant Club has identified the following legal bases:

### **GDPR Article 6(1)(b) which states:**

Contract: that the processing is necessary to enter into a new contract or to work under an existing contract

### **GDPR Article 6(1)(f) which states:**

Legitimate interests: the processing is necessary for your (or a third party's) legitimate interests unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Certain categories of personal data are more sensitive than others. This information is known as 'sensitive personal data' or special category personal data'. This includes things like health information, race, religious beliefs and political opinions.

We only collect special category personal data where it is necessary to achieve a certain purpose and we have a legal basis for doing so. For example, we collect information relating to the ethnicity and disability of our programme participants. We do so, in order to manage and administer our equal opportunities reporting, as well as to ensure that where applicable, applicants and participants are afforded any reasonable adjustments they may require.

Where we will collect special category data (prayer room requirements and allergy information) this will be on the additional ground of being obtained by gaining explicit consent from the staff member.

We have carried out a legitimate interest assessment, which evidences that the information obtained is necessary for The Brilliant Club's core business purpose (administering and delivering the Programme and evaluating the outcomes of the Programme to improve it for future users).

The collection of data also has broader societal benefits as we use the evaluations to prepare impact reports of the challenges facing the families and schools that we work with to bring change and improve the access to higher education. This evaluation cannot be done without processing personal data but processing does not override the data subject's interests.

## **How will your personal data be collected?**

Your personal data will be collected via a school registration form and also via the information you provide to us subsequently in terms of the additional personnel that we will need to deal with in order to ensure the safe administration of the project.

## **Who will personal data be shared with?**

We will share your data with parents and carers, the tutor that is allocated to your school and necessary information will be shared with a partner university in arranging trips. No individual will be named in any report following this Programme and all data will be anonymised and used in aggregate.

After the initial registration process, all data sharing between The Brilliant Club and the School and pupils should be done via the secure Hub.

## **How is the security of your data maintained?**

The Brilliant Club have put in place appropriate measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way,

altered or disclosed. We have a Cyber Essentials accreditation and we are also ISO 27001 accredited. This means that we undergo annual external audits where we are required to demonstrate that the security of the processes and procedures in place meet a set international standard.

In addition, we limit access to your personal information within our internal systems to those who have a business need to know.

## How long will your personal data be kept?

We will retain your personal data only for as long as is necessary for achieving the purpose for which we collected it.

Where we have obtained your consent to process your personal data, we will do so in line with our retention policy. Upon expiry of that period, we will either delete/anonymise your data or seek further consent from you to keep it for longer. Where you do not agree to this, we will stop using your data and ensure it is anonymised so that you can no longer be identified.

## Is personal data being transferred outside of the European Economic Areas (EEA)?

Most of the data we process is stored in the UK. However, we may transfer some of the information you provide to us to organisations outside of the UK and the European Economic Area ('EEA'). For example, this happens when we work with organisations that provide us with a software or an application that we use to administer our Programmes.

When we do this, we always ensure that the recipient organisation provides the same protections for your data that are available in the UK and EEA.

## What rights do I have over my personal data?

Schools and school staff can withdraw from the Programme and/or from their data being processed at any time. Doing so however may mean that we are unable to safely and effectively administer the programme.

Should you/your school withdraw from the programme and evaluation, The Brilliant Club will still use the data you have provided up to that point unless you indicate otherwise.

Under data protection legislation, you have the rights:

- to be informed about which of your personal data we process
- to receive a copy of your personal data;
- to tell us to rectify your data where it is inaccurate or incomplete;

- to have your personal data erased in certain circumstances.
- to restrict processing of your personal data;
- to obtain and reuse your personal – this is also known as data portability;
- to object to the processing of your personal data in certain circumstances;
- not to be subjected to solely automated decision making and profiling;

Please contact the Data Protection Officer at Brilliant Club using [dpo@thebrilliantclub.org](mailto:dpo@thebrilliantclub.org) if at any time you wish to exercise any of your above rights.

## Who can I contact about this project?

For day-to-day queries about the Programme, please use the details of your named Brilliant Club contact that have been provided to you.

If you wish to complain about this privacy notice or any of the procedures set out within it please contact our **Data Protection Officer at [dpo@thebrilliantclub.org](mailto:dpo@thebrilliantclub.org)**

If you believe that your data protection rights have not been adhered to, you also have the right to raise concerns with the Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/make-a-complaint/>.

## Updates

We will update this privacy statement from time to time. If we make any material changes, we will notify you.

The date when this privacy notice was last updated is shown in the footer at the bottom of this document.