



Bright Futures Training

CPD Delegates PRIVACY POLICY

CPD Delegates

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Introduction

This policy explains the practices employed by Bright Futures Training in collecting and using CPD delegate information and the ways this can be influenced by participants on the course.

Scope of Policy

This policy aims to ensure that the processing of information relating to CPD delegates, including the obtaining, holding, use or disclosure of such information is done in accordance with General Data Protection Regulation and Data Protection Act 2018.

Data that is collected

The categories of information we collect, process, hold and share in order to carry out the programme include:

- Personal information including data such as name, school name, role, type of organisation, school address, school telephone number
- Attendance information such as sessions attended, number of absences (absence reasons for the purpose of Ambitions Institute programmes)
- Disability and access requirements
- Dietary requirements
- Evaluation information detailing feedback on training sessions

The purposes for which the data is collected

We will use your data to help provide a better experience during the CPD programme.

- to support CPD development
- to monitor and report on the impact of CPD
- to assess the quality of our services
- to report on our Key Performance Indicators to DfE via a secure portal
- to charge for any CPD and invoice schools/delegates
- to seek consent for the promotion of other courses which may be relevant to your professional development

At Bright Futures Training we take your data very seriously. We collect this data to enable us to process your course application. We will NOT share this information with any other third parties other than when we share appropriate data with course providers to ensure they are able to meet the requirements of their CPD programme delivery.

Sharing with third parties

- We will anonymise participation rates and evaluation analysis with the Department for Education (DfE) and course providers.
- Within the Trust we will share Bright Futures Trust School data with your school.
- Our servers, CRM system and email accounts which are provided by third parties and are subject to contractual conditions to keep your data safe

Why we share delegate information

We do not share information about our delegates with anyone without consent unless the law and our

policies allow us to do so.

In all of the above situations we will only share that information that is necessary to ensure the maximum impact of our training programmes and no other information.

The lawful basis on which we process this information

We process this information under Article 6 and 9 of the GDPR (May 2018):

- Processing is necessary for compliance with a legal obligation to which the controller is subject
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.
- Equal opportunities monitoring: we collect information concerning health and disabilities in order to ensure compliance with the Equalities Act (2010) to ensure we meet our duty to make reasonable adjustments for disabled people

Marketing data

We use comments, opinions, feedback and photographic data from our CPD programme participants to support the evaluation and marketing of our courses. In addition, we retain your non personal data on our mailing list to advertise courses that we feel are suitable for your future development. We process this information when you have provided us with your consent via our booking form. You can withdraw such consent at any time.

Collecting this information

We collect the aforementioned data to enable us to process your course application.

Storing this information

Once we have received delegate data we will ensure that it is treated with the utmost respect and in accordance with the data protection principles and any applicable regulations. Data will be stored on our secure (two factor authentication password protected) cloud based servers connected to UK and European based data centres. Should any printed information be held, this will be kept in a locked filing cabinets in a secure building that requires key card access. We follow strict security procedures in order that the data we collect is stored and disclosed appropriately and securely. We will only keep your information for the duration of the CPD and evaluation period unless you agree to be on our CPD mailing list

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact our Data Protection Officer via dataprotection@bright-futures.co.uk.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed;

- and
- Raise a complaint with the Information Commissioner's Office or seek judicial remedy in certain circumstances

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with our Data Protection Officer in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Further information

If you would like to discuss anything in this privacy notice, please contact:

Anna Sharpley
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