

CHURCH OF ENGLAND & CHURCH IN WALES

Archbishops' Young Leaders Award (AYLA) Privacy Notice

This privacy notice is provided by the National Society (Church of England and Church in Wales) for the Promotion of Education (operating as the Church of England Education Office) to explain what to expect when we collect and process your personal information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Data controller

The data controller is:

National Society (Church of England and Church in Wales) for Promoting Education (Operating as the Church of England Education Office)
Church House, Great Smith Street
London, SW1P 3AZ

For further information on the National Society please visit: https://www.churchofengland.org/about/leadership-and-governance/national-church-institutions

1. Why we collect and use your personal data

The National Society is collecting your personal data to provide the Archbishops' Young Leaders Award (AYLA) (formerly known as Archbishop of York's Young Leaders Award) to schools across England and Wales. To facilitate the AYLA programme and delivery we must collect certain personal information, which means information that could identify teachers and pupils.

We will only collect information that is adequate, relevant, and necessary for the provision of the AYLA, including enabling schools to deliver the AYLA, sharing our resources, supporting schools through the AYLA, advocating on behalf of young people, and marketing to promote the activities of the AYLA. Without this information, the National Society would be unable to offer the AYLA programme to schools.

2. The lawful basis for using your information

We collect and use personal data under the following lawful bases:

Data item	Reason for processing	Condition for processing
First Name	Used as an identifier to manage and administer the AYLA programme. This enables us to fulfil our side of the contract we have with the school to deliver the YLA and support staff throughout.	UK GDPR Article 6(1)(f) "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party" (signing up to deliver the AYLA) – See the Legitimate Interests section below. UK GDPR Article 6(1)(b) "processing is necessaryin order to take steps at the request of the data subject prior to entering into a contract" (signing up to deliver the AYLA)

Email Address	Used to manage and administer the	UK GDPR Article 6(1)(f) "processing is
Linuit Addless	AYLA programme. This enables us to fulfil our side of the contract we have with the school to deliver the YLA and support staff throughout.	necessary for the purposes of the legitimate interests pursued by the controller or by a third party" (signing up to deliver the AYLA) – See the Legitimate Interests section below.
		UK GDPR Article 6(1)(b) "processing is necessaryin order to take steps at the request of the data subject prior to entering into a contract" (signing up to deliver the AYLA)
Last name	Used as an identifier to manage and administer the AYLA programme. This enables us to fulfil our side of the contract we have with the school to deliver the YLA and support staff throughout.	UK GDPR Article 6(1)(f) "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party" (signing up to deliver the AYLA) – See the Legitimate Interests section below.
		UK GDPR Article 6(1)(b) "processing is necessaryin order to take steps at the request of the data subject prior to entering into a contract" (signing up to deliver the AYLA)
Images & Videos	Images and videos of teachers and pupils may form part of the evidence that schools upload to Schoology. We expect these images and videos are provided to us with the consent of the persons within the photos, including the child and their parent or guardian, and in line with the school's photography and filming policy.	UK GDPR Article 6(1)(c) "the data subject has given consent to the processing of his or her personal data for one or more specific purposes"
	AYLA will also seek consent directly from data subjects to use these images or videos for marketing purposes to promote the AYLA.	
Organisation or School name	Used as an identifier to manage and administer the AYLA programme. This enables us to fulfil our side of the contract we have with the school to deliver the YLA and support staff throughout.	UK GDPR Article 6(1)(f) "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party" (signing up to deliver the AYLA) – See the Legitimate Interests section below.
		UK GDPR Article 6(1)(b) "processing is necessaryin order to take steps at the request of the data subject prior to entering into a contract" (signing up to deliver the AYLA)
Role at organisation	Used as an identifier to manage and administer the AYLA programme. This enables us to fulfil our side of the contract we have with the school to deliver the YLA and support staff	UK GDPR Article 6(1)(f) "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party" (signing up to deliver the AYLA) – See the Legitimate Interests section below.
	throughout.	UK GDPR Article 6(1)(b) "processing is necessaryin order to take steps at the request of the data subject prior to entering into a contract" (signing up to deliver the AYLA)

School Year Group & Number of Pupils	School Year Group and Number of pupils are required to facilitate access to the correct course on the Schoology platform.	UK GDPR Article 6(1)(f) "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party" (signing up to deliver the AYLA) – See the Legitimate Interests section below. UK GDPR Article 6(1)(b) "processing is
		necessaryin order to take steps at the request of the data subject prior to entering into a contract" (signing up to deliver the AYLA)
Telephone Number	Used to manage and administer the AYLA programme. This enables us to fulfil our side of the contract we have with the school to deliver the YLA and support staff throughout.	UK GDPR Article 6(1)(f) "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party" (signing up to deliver the AYLA) – See the Legitimate Interests section below.
		UK GDPR Article 6(1)(b) "processing is necessaryin order to take steps at the request of the data subject prior to entering into a contract" (signing up to deliver the AYLA)
Pupil data, which may include names, ages, schools, school email	Pupil name (and school email address if in Key Stage 4/over 16) is used to facilitate access to the Schoology Platform. Pupils may be named in evidence	UK GDPR Article 6(1)(f) "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party" (signing up to deliver the AYLA) – See the Legitimate Interests section below.
addresses, and classes of pupils participating in the Award.	schools upload to Schoology, or their names are provided to AYLA for the creation of certificates. This enables us to fulfil our side of the contract delivering the AYLA and congratulate the pupils' success.	UK GDPR Article 6(1)(b) "processing is necessaryin order to take steps at the request of the data subject prior to entering into a contract" (signing up to deliver the AYLA)

<u>Legitimate Interest Assessment</u>

Because we consider that we have a legitimate interest in processing your personal data, we have undertaken a Legitimate Interests Assessment which sets out why we consider such processing justified.

We have a specific purpose with a defined benefit	The data we are processing allows us to facilitate the delivery and support of the AYLA product to customers (schools) who wish to participate in the Archbishops' Young Leaders Award (AYLA).
The processing is necessary to achieve the defined benefit.	If the processing couldn't go ahead, the AYLA product could not be delivered to customers.
The processing legitimately overrides the interests of the data subject and any risks to their rights or freedoms.	While this data is necessary, we have safeguards in place, including erasure of sensitive information when it's no longer needed, to ensure the rights and freedoms of the data subject will be protected.

For a copy of the full Legitimate Interests Assessment, please contact us using the details in section 7.

3. Who we share your information with:

We will not share your personal data with any other third parties except where specified here. We will be sharing your information with:

- 'Hubspot' and 'Work Etc' software programs used by the AYLA to administer and manage the AYLA programme and delivery.
- 'Schoology' software platform used to deliver the AYLA to schools.
- 'Zoom', 'Eventbrite', and 'Google Forms' used to host forms that potential and existing customers may complete to obtain free resources or sign up to deliver the AYLA.

4. Your personal data will not be sent to countries outside the UK/EEA.

Your personal data be retained on systems that are held within the UK/EEA that are compliant with the current UK/EU GDPR requirements.

5. How long do we keep your information?

We will keep your data for 3 years after AYLA completion date to ensure you can access historical information (including past certificates or results) should you require it.

6. Your rights

You have the following rights regarding your personal data:

- The right to be informed about any data we hold about you;
- The right to request a copy of your personal data which we hold about you;
- The right to withdraw your consent at any time (if applicable);
- The right to request that we correct any personal data if it is found to be inaccurate or out of date:
- The right to request your personal data is erased where it is no longer necessary for us to retain such data;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of your personal data (if applicable).

To exercise these rights, please contact the Data Protection Team using the contact information provided below. The NCIs Individual Rights Policy is available on request.

7. Concerns or Complaints

If you have any queries regarding this processing activity, please contact, in the first instance, **Grace Loughran, Operations Manager via grace.loughran@churchofengland.org.**

If you have any concerns or queries about how the National Society handle your personal data, please contact the Data Protection Officer at:

gdpr@churchofengland.org

or online at: https://www.churchofengland.org/terms-and-conditions/national-churchinstitutions-data-protection or Tel: 020 7898 1030.

You have the right to make a complaint at any time to the Information Commissioner online at: https://ico.org.uk/make-a-complaint/your-personal-information-concerns/ or by phone on 0303 123 1113 (local rate).