

# National Professional Qualifications (NPQ) Equity, Diversity, and Inclusion Research Project Privacy Notice

This privacy notice is provided by the National Society (Church of England and Church in Wales) for the Promotion of Education 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 the Promotion of Education**  
Church House  
Great Smith Street  
London, SW1P 3AZ

For further information on the National Society please go to the following website:

<https://www.churchofengland.org/about/leadership-and-governance/national-church-institutions>

## 1. Why we collect and use your personal data

Personal information is collected ensure the NPQ programmes are recruiting a more representative group of diverse school leaders, to support the National Society’s aim of increasing diversity in the education sector.

## 2. The lawful basis for using your information

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

### Personal data

Data item	Reason for processing	Condition for processing
The NPQ Course you are currently enrolled in.	Collected for data analysis to determine the spread of diversity within a particular course vs across all courses.	<b>UK GDPR Article 6(1)(c)</b> “the data subject has given consent to the processing of his or her personal data for one or more specific purposes”
What is your sex?	Collected for data analysis.	<b>UK GDPR Article 6(1)(c)</b> “the data subject has given consent to the processing of his or her personal data for one or more specific purposes”

**Special Category data**

Data item	Reason for processing	Condition for processing
Is the gender you identify with the same as your sex registered at birth?	Collected for data analysis.	<b>UK GDPR Article 6(1)(a)</b> “the data subject has given consent to the processing of his or her personal data for one or more specific purposes”
What is your ethnic group?	Collected for data analysis.	<p><b>UK GDPR Article 6(1)(a)</b> “the data subject has given consent to the processing of his or her personal data for one or more specific purposes”</p> <p><b>Public task (Article 6(1)(e)</b> – We process ethnicity data to take positive action to enable or encourage those with a protected characteristic which are disproportionately low in educational senior leadership positions to participate in accordance with the Equality Act 2010 (Chapter 2 Paragraph 158(1)(c) Positive Action).</p> <p><b>Substantial Public Interest</b> – Article 9(2)(g) – We will process ethnic origin data in accordance with Schedule 1, Part 2 of the Data Protection Act 2018 paragraph 8(1)(a) and (b) and paragraph 8(2):</p> <p>Equality of opportunity or treatment for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained, <b>OR</b> Schedule 1, Part 2 of the Data Protection Act 2018 paragraph 9(1), for the purposes of promoting or maintaining diversity in the racial and ethnic origins of individuals who hold senior positions in schools.</p>
What is your religion?	Collected for data analysis.	<p><b>UK GDPR Article 6(1)(a)</b> “the data subject has given consent to the processing of his or her personal data for one or more specific purposes”.</p> <p><b>Substantial Public Interest</b> – Article 9(2)(g) – We will process religious beliefs data in accordance with Schedule 1, Part 2 of the Data Protection Act 2018 paragraph 8(1)(a) and (b) and paragraph 8(2):</p> <p>Equality of opportunity or treatment for the purposes of identifying or keeping under review the existence or absence of equality of</p>

		<p>opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained.</p>
<p>Do you have any physical or mental health conditions or illnesses lasting or expected to last 12 months or more?</p>	<p>Collected for data analysis.</p>	<p><b>UK GDPR Article 6(1)(a)</b> “the data subject has given consent to the processing of his or her personal data for one or more specific purposes”.</p> <p><b>Substantial Public Interest</b> – Article 9(2)(g) – We will process physical and mental health data in accordance with Schedule 1, Part 2 of the Data Protection Act 2018 paragraph 8(1)(a) and (b) and paragraph 8(2):</p> <p>Equality of opportunity or treatment for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained.</p>
<p>Which of the following best describes your sexual orientation?</p>	<p>Collected for data analysis.</p>	<p><b>UK GDPR Article 6(1)(a)</b> “the data subject has given consent to the processing of his or her personal data for one or more specific purposes”.</p> <p><b>Public task (Article 6(1)(e))</b> – We process sexual orientation data to take positive action to enable or encourage those with a protected characteristic which are disproportionately low in educational senior leadership positions to participate in accordance with the Equality Act 2010 (Chapter 2 Paragraph 158(1)(c) Positive Action).</p>

### 3. Who we share your information with:

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

- Your data will be collected by a third-party data processor, FormAssembly.

Anonymised national statistics may be published on the Church of England Foundation for Educational Leadership (CEFEL) website, accessible here: <https://www.cefel.org.uk/>. Any data published on this website will be thoroughly vetted to ensure no participants can be identified.

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

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

Anonymised national statistics may be published on the CEFEL website, accessible here: <https://www.cefel.org.uk/>, and so may be accessed by persons outside of the UK.

## 5. How long do we keep your information?

We will keep your data for 5 years, to allow us to compare survey responses year-on-year for the life of our contract with the Department for Education to provide NPQs.

## 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).

Please note: as your personal data is anonymised at the point of collection, you will be unable to withdraw or renew your consent. Please consider this before completing the survey.

To exercise these rights, please contact the Data Protection Team using the contact information provided in section 7 below and quote your Participant ID number. The NCIs Individual Rights Policy is available on request.

## 7. Complaints or concerns

If you have any queries regarding this processing activity, please contact, in the first instance, **Grace Loughran, Operations Manager, [grace.loughran@churchofengland.org](mailto: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](mailto:gdpr@churchofengland.org)
- online via the following link: <https://www.churchofengland.org/terms-and-conditions/national-church-institutions-data-protection> or
- by telephone: 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 telephone on 030 3123 1113 (local rate).