

The Church of England Foundation of Educational Leadership (CEFEL) Programmes - 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 Foundation for Educational Leadership (CEFEL) and 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(s)

The data controller is:

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

For further information about 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

CEFEL believes that the most effective way to grow as a leader is to collaborate with and be challenged by other leaders who share your commitment to excellence. CEFEL’s programmes bring leaders together to support and inspire each other and the data we collect is used to facilitate these programmes, including registration, programme participation, and associated events.

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
Applicant Name	Used as an identifier so we can facilitate your participation in CEFEL programmes.	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 a CEFEL programme) – See the Legitimate Interests section below.
Applicant’s Email Address	To facilitate communications with you	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 a CEFEL programme) – See the Legitimate Interests section below.
Applicant’s Phone Number	To facilitate communications with you Or, if you consent, used to add you to a programme group chat	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 a CEFEL programme) – See the Legitimate Interests section below. UK GDPR Article 6(1)(a) “the data subject has given consent to the processing of his or her personal data for one or more specific purposes” (consenting to join a programme group chat).

Applicant's School Name	To facilitate participation in the network and issue the correct invoices.	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 a CEFEL programme) – See the Legitimate Interests section below.
Headteacher's Name	Used to verify programme registration	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 a CEFEL programme) – See the Legitimate Interests section below.
Headteacher's Email address	Used to verify programme registration	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 a CEFEL programme) – See the Legitimate Interests section below.

Special categories

Data item	Reason for processing	Condition for processing
Accessibility requirements	To ensure that the needs and requirements of programme participants are met so that they can attend training and events with no issues and are not discriminated against as a result.	UK GDPR Article 6(1)(d) "processing is necessary in order to protect the vital interests of the data subject." UK GDPR Article 9(2)(c) "processing is necessary to protect the vital interests of the data subject"
Dietary requirements	To ensure that when at face-to-face events, the participant is not provided with any food containing any ingredients that will result in illness to the participant.	UK GDPR Article 6(1)(d) "processing is necessary in order to protect the vital interests of the data subject." UK GDPR Article 9(2)(c) "processing is necessary to protect the vital interests of the data subject"
Applicant's Ethnicity	Certain CEFEL programmes are intended for leaders from UKME / GHM backgrounds, and so this data is required to ensure programme suitability.	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 a CEFEL programme) – See the Legitimate Interests section below.

Legitimate Interest Assessment

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 collect and process is used to facilitate a person's application to one of our CEFEL Programmes. Some programmes (like the Leaders Like Us programme) are intended for participants with a UKME/GMH background, and so collecting and processing of special category data (ethnicity) is required.
The processing is necessary to achieve the defined benefit.	Without processing the personal and special category data, the CEFEL team are unable to process a person's application nor facilitate their participation in a programme.
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.

- FormAssembly – third-party data processor for capturing form responses.
- Brevo (formerly Send in Blue – third-party data processor for sending out marketing emails including newsletters.
- Some programmes will involve a mentorship opportunity (e.g. Leaders Like Us), and so your name and contact information will be provided to your assigned mentor.
- Some programmes have a dedicated group chat facilitated by the CEFEL team. These group chats are hosted on the WhatsApp messaging platform, and WhatsApp collects users personal information including name and phone numbers. If you consent to joining the group chat, your name and phone number will be visible to other chat participants.

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.

5. How long do we keep your information?

We will keep your data for 1 year after your programme participation concludes.

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. Complaints or concerns

If you have any queries regarding this processing activity, please contact, in the first instance, **Lisa Osborne, Governance Support Officer via lisa.osborne@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-church-institutions-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).