



## OTSA/OTSH Privacy Notice

### Introduction

Under UK data protection law, individuals have a right to be informed about how organisations use any personal data that they hold about them. We comply with this right by providing privacy notices to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals we engage with regarding activities of OTSA and OTSH.

### Name and contact details of the organisations

OTSA and OTSH are part of the River Learning Trust. The River Learning Trust is an exempt charity and a company limited by guarantee, registered in England and Wales.

Registered Company Number 7966500.

Registered Office: c/o Gosford Hill School, Oxford Road, Kidlington, Oxfordshire, OX5 2NT

The OTSA and OTSH registered addresses are:

#### OTSA

% King Alfred's School  
Portway  
Wantage  
OX12 9BY  
01865 647 999

[info@otsa.org.uk](mailto:info@otsa.org.uk)

#### OTSH

% The Cherwell School  
Marston Ferry Road  
Oxford  
OX2 7EE  
01865 647 999

[info@otsh.org.uk](mailto:info@otsh.org.uk)

OTSA/OTSH is the 'Data Controller' for the purposes of data protection law. We work with a variety of other organisations in the course of our work who are described as 'Data Processors' for the purposes of data protection law.

### The personal data we hold

We process data relating to individuals with whom we engage in relation to our activities which include:

- Initial Teacher Training
- Appropriate Body
- Early Career Framework
- National Professional Qualifications
- Professional Development
- Recruitment & Retention

Appendix A details the information that is collected for each of these activities.

This data will usually be supplied by you, however we may also use data, such as your job title and email address, that is publicly available on school websites and social media accounts belonging to you, e.g. your LinkedIn profile.

### **Why we use this data**

The purpose of processing this data is to allow OTSA/OTSH to undertake our role as:

- A provider of Initial Teacher Training
- An Appropriate Body for ECT Induction
- A delivery partner of the Early Career Framework
- A delivery partner of National Professional Qualifications
- A provider of professional development for people working in schools
- A provider of recruitment and retention services to schools

We also use information provided to us by individuals and third parties to allow us to:

- Comply with statutory reporting to the Department for Education
- Monitor the impact of our delivery

### **Our lawful basis for using this data**

OTSA/OTSH carries out its work in the public interest, also known as 'Public Task'. OTSA/OTSH operates under the statutory frameworks of English educational legislation, and specifically the Education Act 2011.

OTSA/OTSH's activities are underpinned by the principals and proposals in the November 2010 White Paper, The Importance of Teaching, and the March 2022 White Paper, Opportunity for All, which state the government's intention to develop a national network of schools to deliver Initial Teacher Training, Appropriate Body Services, the Early Career Framework, National Professional Qualifications and other professional development with the aim of improving the recruitment and retention of teachers in England.

### **How we store this data**

Like most organisations, we use 3rd parties to provide services to our customers and to store data. A list of the 3rd parties who process personal data is listed below. Personal data is stored securely using cloud-based systems. Access to your data is restricted with only OTSA/OTSH staff having access. Where additional security methods such as two-factor authentication are available these are implemented. We will retain your personal data for as long as it is necessary to fulfil the purposes for which it was collected and will securely dispose of your data when we no longer need it.

The data storage systems we use are Google Drive, ECT Manager, Insightly CRM, Eventbrite and jobboard.io.

Our data storage systems are based in the UK, EEA and USA. We ensure that in cases where data is stored on servers in the USA that the 3rd party complies with the EU Standard Contractual Clauses (SCCs) and the UK International Data Transfer Addendum (IDTA) which allow us to lawfully transfer data to the USA. We conduct thorough reviews of all our 3rd parties, including data protection agreements, where possible to ensure that every possible safeguard is in place and that the data is secure.

## **Data sharing**

We do not share information about you with any third party without your consent unless the law requires us to do so. Where it is legally required, or necessary (and it complies with UK data protection law) we will share personal information about you with third parties, such as the Department for Education, Teacher Regulation Agency and professional development delivery partners.

## **Automated decision making and profiling**

We do not use automated decision making or profiling when processing your data.

## **Our websites**

Our websites use cookies to capture data about the number of visitors to the pages on each website. We use this data to measure the effectiveness of our website and to provide engagement data to the DfE when required by them. You can block cookies by activating a setting on our cookie banner allowing you to refuse cookies. You can also delete cookies through your browser settings. If you turn off cookies, you can continue to use our websites and browse its pages.

## **Marketing**

In order to fulfil our public interest task, specifically providing professional development for people working in schools, we will use your data to send you information about professional development opportunities that may be of interest to you. We will send you emails or telephone you with information that is specific to opportunities offered by OTSA/OTSH. We do not sell your data or share it with other organisations for marketing purposes.

Our marketing messages are sent using Insightly or Gmail. You may opt out of receiving marketing emails at any time by clicking on the unsubscribe link, or by contacting us directly.

There will be occasions when we send administrative messages, these messages are not deemed to be marketing and cannot be opted out of.

Marketing and administration emails that you receive from OTSA will contain a tracking pixel. This pixel lets us know things such as how many emails have been opened and how many items in the email have been clicked on. The pixel also lets us know if an email has not been delivered so that we are able to update our records and keep them current.

When we analyse the data we do so from an aggregated perspective, meaning that we report upon an overall number of open rates and click rates.

## **Your rights**

Individuals have a right to make a 'subject access request' to gain access to personal information that OTSA/OTSH holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are storing and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with

- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

If you wish to make a subject access request contact OTSA/H by email or by telephone (contact details are at the beginning of this privacy statement).

Individuals have the right to object to the processing of their personal data under the terms of our legal basis of 'public task', although this is not an absolute right. An individual must give specific reasons why they are objecting to the processing of their data.

If you wish to object to the processing of your data by OTSA/OTSH contact OTSA/OTSH by email or by telephone (contact details are at the beginning of this privacy statement).

Individuals have an absolute right to stop their data being used for direct marketing at any time.

If you wish OTSA/OTSH to stop using your data for direct marketing you may unsubscribe using the link in marketing emails or contact OTSA/OTSH by email or by telephone (contact details are at the beginning of this privacy statement).

### **Data Breaches**

Should a breach of your data occur that is likely to result in the harm to the rights and freedoms of an individual or group of individuals we will notify those involved within 72 hours along with the ICO, where applicable.

### **Data Protection Officer**

OTSA/OTSH are part of the River Learning Trust. The Data Protection Officer for the River Learning Trust is Louise Askew. She can be contacted on [laskew@riverlearningtrust.org](mailto:laskew@riverlearningtrust.org).

### **Complaints**

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact the Director of OTSA/OTSH.

- [info@otsa.org.uk](mailto:info@otsa.org.uk)

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## Appendix A

### **Initial Teacher Training:**

#### Trainee Teachers:

- Names and contact details
- Phase and subject/s trained to teach
- Year in which ITT began
- Teacher Reference Number
- Employment record
- Professional Development record

#### Mentors, senior links, headteachers:

- Names and contact details
- Phase and subject/s trained to teach, as appropriate
- Employment record
- Professional Development record

#### Visiting tutors and subject tutors:

- Names and contact details
- DBS certificate numbers
- Phase and subject/s trained to teach, as appropriate
- Areas of expertise
- Application form
- Social media profile names
- Employment record
- Professional Development record

### **Appropriate Body:**

#### Early Career Teachers:

- Names and contact details
- Date of birth
- Teacher Reference Number
- ITT Provider
- ITT Phase
- Date QTS awarded
- Name of employing organisation
- Employment record
- Job title
- Nature of contract with employing organisation
- Name of previous schools at which NQT induction was served
- Start date of induction
- Professional development record
- Lesson observation forms
- Meeting notes and actions forms
- Teacher standards evidence forms
- Professional review forms
- Assessment forms
- Personal support plans
- Records of emails and telephone communications

- Records of meetings and quality assurance visits

We will also collect, store and use information about ECTs that falls into "special categories" of more sensitive personal data. This includes information about:

- Ethnicity
- Trade union membership
- Health, including medical conditions and number of days absence during induction

Mentors, induction tutors, lead induction tutors and headteachers:

- Names and contact details
- Phase and subject/s trained to teach, as appropriate
- Employment record
- Professional Development record

ECT Induction Leaders:

- Names and contact details
- DBS certificate numbers
- Phase and subject/s trained to teach, as appropriate
- Areas of expertise
- Application form
- Social media profile names
- Employment record
- Professional Development record

### **Early Career Framework:**

Early Career Teachers:

- Names and contact details
- Job title
- Teacher Reference Number
- Programme engagement data, including attendance at training sessions and completion of online learning tasks
- Survey data about the ECF programme
- Factors affecting participation in the ECF programme, including part time / full time status, interruptions to participation due to ill health / absence from work
- Special requirements (such as accessibility needs)
- Dietary requirements
- Employment record
- Professional Development record

Mentors:

- Names and contact details
- Job title
- Teacher Reference Number
- Programme engagement data, including attendance at training sessions and completion of online learning tasks
- Survey data about the ECF programme
- Factors affecting participation in the ECF programme, including part time / full time status, interruptions to participation due to ill health / absence from work
- Special requirements (such as accessibility needs)

- Dietary requirements
- Phase and subject/s trained to teach, as appropriate
- Employment record
- Professional Development record

Induction tutors, lead induction tutors and headteachers:

- Names and contact details
- Employment record
- Professional Development record

ECF Facilitators

- Names and contact details
- DBS certificate numbers
- Phase and subject/s trained to teach, as appropriate
- Areas of expertise
- Application form
- Social media profile names
- Employment record
- Professional Development record

### **National Professional Qualifications:**

Programme Participants:

- Names and contact details
- Job title
- Teacher Reference Number
- Programme engagement data, including attendance at training sessions and completion of online learning tasks
- Survey data about the NPQ programme
- Factors affecting participation in the NPQ programme, including part time / full time status, interruptions to participation due to ill health / absence from work
- Special requirements (such as accessibility needs)
- Dietary requirements
- Application form
- Employment record
- Professional Development record

NPQ Facilitators:

- Names and contact details
- DBS certificate numbers
- Phase and subject/s trained to teach, as appropriate
- Areas of expertise
- Application form
- Social media profile names
- Employment record
- Professional Development record

### **Professional Development**

Participants:

- Names and contact details
- Job title
- Phase and subject/s trained to teach, as appropriate
- Special requirements (such as accessibility needs)
- Dietary requirements
- Evaluation forms
- Employment record
- Professional Development record

Facilitators:

- Names and contact details
- DBS certificate numbers
- Phase and subject/s trained to teach, as appropriate
- Areas of expertise
- Designations, e.g. NLE, SLE status
- Application form
- Social media profile names
- Employment record
- Professional Development record

**Recruitment & Retention**

Employers:

- Names and contact details

Job applicants:

- Names and contact details
- Biography
- Photo
- Curriculum Vitae
- Social media profile names
- Employment history
- Educational history
- Certificates
- Areas of expertise
- Attendance at recruitment events

**General contact data:**

Teaching School Hubs collect and process contact details for early years providers, including nursery schools, day nurseries, independent nurseries and childminders as well as contact details for school leaders, teachers, support staff and governors; these details are used to contact people about appropriate professional development opportunities.

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