



## **CSSC privacy notice**

Jennifer McIlwaine  
Corporate Services Officer  
Email: [Jennifer.McIlwaine@csscni.org.uk](mailto:Jennifer.McIlwaine@csscni.org.uk)  
Tel: 028 9531 3037

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## **Controlled Schools' Support Council**

### **Privacy notice**

#### Introduction

Your privacy is important to us and the Controlled Schools' Support Council (CSSC) will process your personal data in line with the requirements of the Data Protection Act 2018 - General Data Protection Regulation (GDPR) from 25 May 2018.

CSSC does not fall into any category that obliges them to appoint a Data Protection Officer. However, CSSC's Corporate Services Officer is the main point of contact for GDPR.

Individuals have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO's details are as follows:

The Information Commissioner's Office – Northern Ireland  
3rd Floor  
14 Cromac Place  
Belfast  
BT7 2JB

Telephone: 028 9027 8757 / 0303 123 1114

Email: [ni@ico.org.uk](mailto:ni@ico.org.uk)

<https://ico.org.uk/>

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## **1. What is the Controlled Schools' Support Council?**

The Controlled Schools' Support Council (CSSC) is the advocacy body for Northern Ireland's 558 controlled schools.

CSSC is a Third Sector Voluntary Organisation, and a Company Limited by Guarantee. CSSC is classified by the Department of Finance as a non-profit institution and part of the private sector. The Organisation is recognised as a charitable organisation by the Charities Commission for Northern Ireland but has not yet been called forward for formal registration.

CSSC is located at Stranmillis University College.

The address and contact details for this office can be found at point 20 of this Privacy Notice.

## **2. What does CSSC do?**

CSSC supports controlled schools, which are open to all faiths and none, in providing high quality education for children and young people to enable them to learn, develop and grow together, within the ethos of non-denominational Christian values and principles.

Its functions include:

- providing a representational and advocacy role for controlled schools, including advice and support in responding to consultation exercises in respect of education policies, initiatives and schemes and in regard to relationships with the Department, the Education Authority and other Departments
- working with schools within the sector to develop and maintain its collective ethos, including, where appropriate, a role in identifying, encouraging and nominating governors and ensuring that ethos is part of employment considerations
- working with the Education Authority to raise educational standards; participating in the planning of the schools estate; assessing ongoing provision within the sector
- participating in area-based planning coordinated by DE and the Education Authority, including membership of the Department's area planning steering group
- engaging, where appropriate, in strategic planning processes, including community planning and
- building cooperation and engaging with other sectors on matters of mutual interest, including the promotion of tolerance and understanding

CSSC does not employ teachers who work in controlled schools

CSSC is core funded by the Department of Education (DE) and has the capacity to seek funding from other sources.

### **3. Scope**

This privacy notice describes how CSSC collects and uses personal information about data subjects. Specific privacy notices are available upon request.

#### **4. GDPR lawful basis for processing personal data**

The lawful bases for processing are set out in Article 6 of the GDPR. At least one of these must apply whenever an organisation processes personal data:

- (a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
- (b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- (c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).
- (d) Vital interests: the processing is necessary to protect someone's life.
- (e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- (f) Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks).

Processing carried out by CSSC is most likely to fall under c and/or f above.

#### **5. Consent**

There may be occasions when consent is the only legal basis we have to process your personal data. When this occurs, we will seek your consent at the time we gather your personal data. You will normally be asked to provide a signature or indicate consent by ticking a box, but this will only be carried out after a full explanation has been provided and you are clear as to what you are consenting to.

Consent is a core principle of data protection law and GDPR sets a high standard for this. It must be a freely given, specific, informed and unambiguous indication of the data subject's wishes, by a statement or by a clear affirmative action, which signifies agreement to the processing of personal data relating to the individual.

#### **6. Why does CSSC collect and use this information?**

CSSC collects and uses personal data to:

- pursue the organisation's objectives
- provide a service

- comply with legal and statutory obligations
- contact you
- update your records
- establish your needs and provide you with assistance
- prevent and detect fraud and corruption in the use of public money
- obtain your opinion about our services
- inform you of other services
- for research
- administer our contract with you

## **7. Description of the personal data processed by CSSC**

The personal data processed by CSSC relates to

- Pupils
- Other young people
- Parents/Guardians
- Representatives
- Teachers
- School Governors
- Employees and Board Members
- Customers and clients
- Suppliers and service providers
- Advisers, consultants and other professional experts
- Complainants and enquirers.

The categories of personal data processed by CSSC include

- Personal details
- Contact details
- Family, lifestyle and social circumstances
- Financial details
- Employment and education details
- Goods or services provided
- Details in relation to school inspections carried out by the Education Training Inspectorate (ETI)
- Offences (including alleged offences)
- Photographic/video
- Website

In addition, the following Special Category Personal Data (formerly known as Sensitive Personal Data) may be processed

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Health
- Sexual orientation.

We will only process Special Category Personal Data, where it is necessary and for the original purpose for which it was obtained, in line with the requirements of the GDPR.

#### **8. How does CSSC obtain personal data?**

In order to carry out our functions and respond to queries from data subjects on education issues we may obtain information from:

- Data subjects and/or their representatives
- Application forms completed by data subjects or their representatives
- Correspondence from data subjects or their representatives
- Educational organisations and examining bodies
- Other Northern Ireland government departments and organisations working as their agents
- Non Departmental Public Bodies/Arm's Length Bodies/Sectoral Bodies
- Central government
- European Union organisations
- Current, past and prospective employees/employers
- Suppliers and service providers
- Financial organisations such as banks and building societies
- Taxation authorities such as HM Revenue & Customs
- Courts, tribunals and parties to litigation
- Police forces
- The courts on production of a valid court order
- Publicly accessible sources
- Social media and other public platforms, including the CSSC website
- Events
- Research

#### **9. Cookies and similar technologies**

The CSSC website uses various technologies to collect and store information when you visit a Google service, and this may include using cookies or similar technologies to identify your browser or device.

Our Google Analytics product helps us analyse the traffic to our website. Google Analytics information is linked, by the Google Analytics customer or by Google, using Google technology, with information about visits to multiple sites.

Google Analytics stores information about what pages you visit, how long you are on the website, how you got here and what you click on. Through this, we cannot identify who you are and do not collect or store your personal details such as your name or address.

CSSC is active on Twitter and Twitter analytics are used to inform audience insights.

CSSC has no control over the use of cookies on third party sites. For more information on the privacy policies for the social media sites please click on the relevant links below:

- [Twitter](#)
- [Google](#)

## **10. Events and research**

CSSC's privacy notice for events is available separately.

CSSC-led research is commissioned as and when required for the purposes of producing reports which are used to underpin CSSC's programme of work and activities. Research responses are kept confidential and where necessary are suitably anonymised unless explicit permission is given.

## **11. Who does CSSC share your personal data with?**

CSSC sometimes needs to share the personal data we process with the data subject and also with other organisations. Where this is necessary or required we will comply with the GDPR and we will only share the information that we have to, in order to carry out a specific role or function, which the law allows us to.

CSSC may have to share data subject information with third parties, including third-party service providers and other bodies such as

- CSSC's member schools
- Education Authority
- The Department of Education Northern Ireland
- Other Northern Ireland government departments and organisations working as their agents
- Companies House
- PSNI
- Information Commissioner's Office
- Suppliers and service providers such as appointed internal and external auditors, solicitors, website hosts and marketing/research software companies that carry out mailing or research commissioned by CSSC
- HMRC
- Tribunals and parties to litigation or for the prevention/detection of crime or fraud
- Financial organisations such as banks
- Photographers

## **12. Transfer of personal data to other countries**

If it is ever necessary for CSSC to transfer your personal data overseas to be processed, any transfers made will be in full compliance with all aspects of the GDPR.

## **13. How long does CSSC keep your personal data for?**

CSSC will only retain personal data for as long as it is required, for the purpose(s) for which it was obtained and in line with CSSC's approved Information Asset and Document Retention Policy which can be requested from Corporate Services. This gives more information about how long CSSC keeps personal information.



CSSC does not store personal information indefinitely. Data is only stored for as long as is necessary to complete the task for which it was originally collected including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, CSSC considers:

- the amount, nature, and sensitivity of the personal information
- the potential risk of harm from unauthorised use or disclosure of employee personal information
- the applicable legal requirements and those of their funder/s
- the purposes for which they process employee personal information and whether those purposes can be achieved through other means

In some circumstances, CSSC may anonymise data subject information so that it can no longer be associated with them, in which case CSSC may use such information without further notice.

#### **14. Data Security**

CSSC has put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, CSSC limits access to personal information to those employees, agents, contractors and other third parties who have a need to know. They will only process personal information on CSSC instructions and they are subject to a duty of confidentiality.

CSSC has put in place procedures to deal with any suspected data security breach and will notify data subjects and any applicable regulator (currently the Information Commissioner's Office) of a suspected breach where there is a legal requirement to do so.

#### **15. Your rights under the Data Protection Act 2018 – GDPR**

Under GDPR, individuals have the right to obtain confirmation that your personal data is being processed and request access to your personal data. To make a request for personal information, contact CSSC's Corporate Services Officer.

CSSC may need to request specific information from you to help confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

You have the right to

- **Request access** to personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information that CSSC holds about you and to check that it is being lawfully processed. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, CSSC may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, CSSC may refuse to comply with the request in such circumstances.
- **Request correction** of the personal information that CSSC holds about you. This

enables you to have any incomplete or inaccurate information CSSC holds about you corrected.

- **Request erasure** of your personal information. This enables you to ask CSSC to delete or remove personal information where there is no good reason for the organisations to continue to process it. You also have the right to ask CSSC to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where CSSC is relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where CSSC is processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask CSSC to suspend the processing of personal information about you, for example if you want CSSC to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If a data subject wishes to exercise any of these rights, please contact the Corporate Services Officer.

A copy of CSSC's Data Protection policy is available on request from the Corporate Services Officer.

The web link below will take you to the ICO website where you will find more information about your Rights under GDPR:

[ICO website - guide to GDPR](#) (external link opens in a new window / tab)

## **16. Raising your concerns**

If you are unhappy with how any aspect of this Privacy Notice, or how your personal data is being processed, please contact the Corporate Services Officer

## **17. Making a complaint to the ICO**

Individuals have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO's details are as follows:

The Information Commissioner's Office – Northern Ireland  
3rd Floor  
14 Cromac Place,  
Belfast  
BT7 2JB  
Telephone: 028 9027 8757 / 0303 123 1114

Email: [ni@ico.org.uk](mailto:ni@ico.org.uk)

### **18. Changes to this Privacy Notice**

This Privacy Notice is under regular review and updates will be placed on CSSC's website.

This Privacy Notice was last updated 20 September 2018.

### **19. Alternative formats**

If you need a copy of this Privacy Notice in an alternative format or language, please contact CSSC's Corporate Services Officer at the address below and we will do our best to provide you with it.

### **20. CSSC contact details**

Corporate Services Officer  
Controlled Schools' Support Council  
Second Floor, Main Building  
Stranmillis University College  
Stranmillis Road  
Belfast  
BT9 5DY