

The Difference Data Collection and Privacy Notice

The Difference is a limited company (11426427) and registered charity (1184843) in England and Wales. The Difference exists to improve the life outcomes of vulnerable children by raising the status and expertise of those who educate them.

What information will we collect?

The Difference will collect and process your personal information through the programme application process and at later stages in the selection, enrolment and programme journey, as applicable. This includes:

- Name and contact details, including emergency contact details.
- Biographical details (e.g. nationality, gender and date of birth).
- Equal opportunities data (e.g. ethnicity, gender, sexuality, disability, religious belief, free school meal status).
- Academic and employment history.
- Information about medical or health conditions, including whether you have a disability and require reasonable adjustments.
- References from third parties.
- Information on any criminal convictions.
- Information about your entitlement to work in the UK.
- Information about your motivations, competencies and previous experiences.

What legal basis do we have for processing your personal data?

For (non-sensitive) personal data we rely on our legitimate interests. This means that The Difference has made a careful assessment of the most appropriate lawful means to collect and process the data. This decision is based on the following: we have identified a lawful business objective; processing is not likely to result in unwarranted harm or distress to you; the processing is in your interest; the processing would be expected by you. You can object to this processing at any time and we will no longer process your personal data unless we can demonstrate compelling legitimate or legal grounds. You should be aware that to stop processing may affect your ability to complete your application or participate in a programme, and if so we will explain our reasoning.

For special categories of data (sensitive data) we rely on your consent. This includes racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual orientation, mental and physical health. Your consent is also sought for processing criminal record checks we carry out. You can withdraw consent and we will inform you if this will have an impact on your application or continuing participation.

What will we use this information for?

We will use your information in the following ways (this is not an exhaustive list):

- Helping you to access and go through the application process.
- Making placement decisions.
- Completing all the necessary pre-employment checks.
- Management of your records for administration purposes.
- Statutory and other legal obligations, for example to complete statistical returns to our funders.
- To provide you with appropriate support through the recruitment process and on the programme.
- Equality data monitoring, analysis and planning.

- For inclusion in management information, statistical analysis and internal research.
- Marketing and alumni relations purposes, including contacting you with job and career development opportunities in the future (this will always be subject to your opt-in consent).

How long do we keep your personal data for?

For unsuccessful applications, we will retain your personal information for monitoring and evaluation purposes. After two years we will anonymise/aggregate or delete your data

For successful applicants, your personal information will be retained for the duration of the programme and for up to 3 years following the programme after which time, unless you then consent to us retaining your data for future purposes, it will be anonymised/aggregated or deleted.

Who do we share personal data with?

Below are some of the parties/organisations that we may share your personal information with:

- Schools
- Salesforce (our CRM provider)
- Trusted third parties that The Difference works with to deliver its programmes.
- Statutory or funding bodies e.g. corporate supporters.
- We may also share anonymised data with partners in order to improve and inform our marketing activity.

How do we secure personal data?

The Difference has internal controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by employees in the performance of their duties.

Whenever we share your information with third parties who process the data on our behalf, we require such third parties to comply with our instructions and data protection law, making sure the appropriate controls are in place.

We have contracts in place with our data processors some of whom are international companies. If the companies store your data within the EEA then this is deemed to provide adequate safeguards under EU law. If they do not, and are not listed in an EU-approved third country list, then we follow GDPR guidance to ensure the individual processors in question have adequate safeguards to protect your data and this is formally agreed with the contract with hold with them.

Your rights in relation to personal data

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you providing it does not infringe the rights of others.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.

- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling.
- Right to judicial review: in the event that Frontline refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below.

How to contact us

In the event that you wish to make a complaint about how your personal data is being processed please contact info@the-difference.com (please reference “personal data” in the subject of the email). If you are not satisfied how your complaint is handled by The Difference you have the right to lodge a complaint with the Information Commissioner’s Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Tel 0303 123 1113.