

Previous version	3 December 2024
Frequency of update	At least every two calendar years
Next update due	December 2027

Aim: To set out how the charity uses and protects personal data.

In this policy, 'the Charity' or 'we' or 'us' means 'Number Champions'.

We will comply with all applicable data protection and privacy legislation, including the Data Protection Act 2018 ('the Act').

The Charity acts as the controller of various types of personal data which it needs to collect and process in order to perform functions necessary to achieve its Charitable Objects.

We aim to process the minimum personal data we need to achieve our Charitable Objects. We recognise and respect the legal rights and reasonable expectations of individuals over their personal data and privacy, together with the higher standards required for management of personal data relating to children.

The Charity seeks to maximise protection of data relating to children by not processing any child's full name or other data which would directly identify a specific child. A school will be able to identify a specific child by linking the partial data which we hold to its class rolls.

The full name and address of the Charity is:

Number Champions CIO
6 Totnes Walk
London
N2 0AD

The Chief Executive Officer of Number Champions is responsible for privacy and data protection. . You should send all correspondence on privacy or data protection to Number Champions at the above address or at admin@numberchampions.org.uk.

The trustees of the Charity will ensure that the personal data which it holds is processed only for the purposes stated in section 2 below. It will also ensure that each trustee, volunteer, staff member, and other person with access to the Charity's records ('our personnel') are aware of (i) their duty of confidentiality and (ii) their responsibility to access and process data only according to the instructions of the Charity as documented in this policy and elsewhere.

It is inevitable that sometimes our personnel will receive documents with personal data sent to Number Champions, for example ID documents sent by volunteers as part of their recruitment process. In such cases, the personnel shall immediately forward the documents to the appropriate address in Number Champions and delete any paper or electronic copies in their possession.

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1) Legal rights of individuals ('data subjects')

The 'data subjects' covered by the Act include living individuals anywhere who deal with a 'controller' in the UK. A 'controller' is the legal entity which defines how personal data is processed. 'Personal data' is any data which can be linked to a data subject.

Data subjects have the following specific rights:

- a) to receive transparent information
- b) to access their own data
- c) to rectify inaccurate data
- d) to erasure ('right to be forgotten') in specific circumstances
- e) where the legal basis of processing is consent, to withdraw consent
- f) to restriction of processing
- g) to object to processing
- h) not be subject to automated decisions
- i) to 'data portability'
- j) to complain to a 'Supervisory Authority'

The Act provides that a statutory requirement or court order can require a controller to disclose data or to retain data beyond the period stated in its data protection policy. A controller can also disclose or retain data where this is necessary for protection of its legal rights.

The Supervisory Authority is the 'ICO':
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

You can send complaints or other correspondence to the above address or send an email through the ICO site <https://ico.org.uk/global/contact-us/email>.

Under your written request on any of these rights, the Charity will respond without undue delay and in any case within one month. The Charity will not charge a fee for an initial request, but it reserves the right to charge an administrative fee for handling a request repeated within a year, or in case of otherwise manifestly unfounded or excessive requests. The contact details for all requests are given on page 1 above.

2) Processing activities

2.1 Supporting children in acquiring maths skills

Data held

- School
- School class (year and class name)
- First name of child plus as many leading letters of the surname as are necessary to allow the school to identify the child uniquely
- Gender
- Quarter of birth (Sep/Oct/Nov, Dec/Jan/Feb, Mar/Apr/May, Jun/Jul/Aug)
- School year of birth (ie whether the normal year for the class or the previous or subsequent year)
- Whether child has English as an alternative language (EAL)
- Whether the child is in receipt of Pupil Premium funding or, if not, whether the school considers the child to be from a disadvantaged background. This information will be used only centrally in the charity for analysis and aggregate reporting and, in particular, will not be shared with the volunteers
- Volunteer working with child
- 'Selection of child' form from teacher stating shortfalls in the child's skills and relevant information for the volunteer giving help
- 'Feedback on outcome' form from teacher giving evaluation of the child's attitudes, attainment and progress.

Purpose

To track, monitor, evaluate, and improve the support which the Charity gives to children in acquiring skills in mathematics.

Basis of lawfulness

Fulfilment of a contract based on the agreement with the child's school, legitimate interests of the Charity to achieve its Charitable Objects.

Transfer of data

Number Champions may transfer personal data to a third party only for the purpose of independent audit of its processes by a UK academic or accounting organisation or similar which is generally recognised as reputable in this field and which can confirm that it will not share the data with any other party.

Number Champions may transfer data which is not personal data to reputable academic researchers for the purpose of research. Such data will not include any part of any child's name or the class name, and the conditions of transfer will include confidentiality over publishing details of combinations of gender and birth quarter for individual schools.

Period for which data will be held

Number Champions will redact all electronic records a year after the end of the school year in which they are created to (a) remove the name of each child and (b) delete the class name leaving just the school year. The forms populated by teachers will also be deleted at this time. The remaining data, which will not be personal data, may be kept indefinitely for analysis and research.

A condition of use for research will be that the detailed information linking child to school, year, quarter of birth, and gender is kept confidential and that only statistics are published.

2.2 Management of In-School Volunteers

Data Held

- Name
- Address
- Contact details
- Copy identification documents including letters of reference
- Copy of Number Champions policies signed
- History of schools, children worked with
- Where applied for by Number Champions, DBS (Disclosure and Barring Service) certificates, otherwise certificate number and issue date
- Interview record

Purpose

To track, manage, and improve the support which the Charity gives to children in acquiring skills in mathematics and to support the safeguarding of children.

Basis of lawfulness

Legitimate interests of the Charity to monitor volunteers and to prove identity for statutory requirements, to support safeguarding, and to facilitate the efficient working of the volunteer's activities.

Transfer of data

None without explicit consent except for

- A) name and contact details which will be given (i) to a school to which the volunteer is assigned (ii) to a Mentor assigned to support the volunteer and (iii) to other In-School Volunteers at the same school, and
- B) Name and address which we may give to an insurance company which insures our activities and legitimately requires details of the volunteers covered by the policy.

Period for which data will be held

For three years after the last school year of involvement with Number Champions.

2.3 Management of other volunteers

Data Held

- Name
- Address
- Contact details
- Copy identification documents including letters of reference
- Copy of Number Champions policies signed
- History of schools worked with
- History of volunteers worked with
- For trustees and others where required, DBS (Disclosure and Barring Service) certificates or else certificate number and date of issue
- Interview record

Purpose

To manage and provide support to in-school and other volunteers and to manage the work of the charity.

Basis of lawfulness

Legitimate interests of the Charity to monitor and manage volunteers, and to achieve its Charitable Objects.

Transfer of data

None without explicit consent except for

- A) name and contact details which may be given to a school with which the volunteer has contact and which may be shared with (i) In-School Volunteers and (ii) Mentors who have responsibilities at the same school, and
- B) name and address which we may give to an insurance company which insures our activities and legitimately requires details of the volunteers covered by the policy.

Period for which data will be held

For three years after the last school year of involvement with Number Champions.

2.4 Management of staff

Data Held

- Name
- Address
- Contact details
- Copy identification documents including letters of reference
- Contract of employment
- Copy of Number Champions policies signed
- DBS (Disclosure and Barring Service) copy certificate or else certificate number and date of issue
- Interview record
- HR file including all correspondence and records of meetings concerned with recruitment, management, performance management, or leaving employment
- Documents legitimately held outside the staff member's HR file which refer to the staff member in the context of management, performance management, complaints, disciplinary actions, or similar (excluding non-personal data such as minutes of business meetings which a staff member attends or business documents which a staff member signs within their role)
- Pay, expenses, and tax records
- Such other information as detailed in the HR Privacy Notice supplied to employees and held with the basis of lawfulness and purpose stated there.

If there is any inconsistency between the HR Privacy Notice and this Policy, the Policy shall be binding. Once an inconsistency is identified we will make reasonable attempts to resolve it.

Purpose

To enable management of the staff member and to keep records as required by HMRC and by employment law.

Basis of lawfulness

Legitimate interests of the Charity to manage staff and to support safeguarding, statutory duties to maintain records under employment law and financial and tax records

Transfer of data

None without explicit consent except (i) as required operationally or under statute to HMRC or a pension provider or (ii) name and address which we may give to an insurance company which insures our activities and legitimately requires details of the staff covered by the policy.

Period for which data will be held

For six years after the last tax year of involvement with Number Champions.

(For documents used only to show the right to work in the UK, this period will be reduced to two years.)

For unsuccessful applicants to roles, we will hold data for six months from the interview date in case the preferred candidate does not meet the post-interview checks or there is a discrimination claim.

2.5 Managing relationships with schools

Data held

The Charity keeps the names and contact details of staff it works with at schools.

Purpose

To enable the Charity to pursue its Charitable Objects by working with schools.

Basis of lawfulness

Legitimate interests of the Charity to achieve administrative efficiency.

Transfer of data

None without explicit consent.

Period for which data will be held

For current partner schools we will ensure that the contact names and details are kept up to date. For schools which are no longer partner schools, one year after the end of the year in which they leave we will delete personal emails and mobile numbers. (Ie we can leave "head@.." etc and school landline numbers.)

2.6 Managing gift aid

Data held (on donors)

- Title
- First name or initial
- Surname
- Full home address
- Postcode
- Donation history

Purpose

To enable the charity to administer gift aid.

Basis of lawfulness

The legal requirement to hold the data for six years after the last donation.

Transfer of data

Number Champions will transfer data to HMRC at its request.

Period for which the data will be held

The donation history will be held for the last six years

All other data will be held until there has been six years since a donation.

2.7 Declaration of Interests

Data held (on trustees and their spouses/partners)

- Employments or self-employments
- Trustee positions or equivalent held at charities or other pro-bono organisations

- Relevant gifts or hospitality worth over £10 received in the last 12 months
- Any other interest the trustee believes is more likely than not to create a conflict in the next 12 months

Purpose

To enable the board of trustees to manage conflicts of interest as required by law and by Charity Commission regulation

Basis of lawfulness

As above

Transfer of data

None unless it should be required by law.

Period for which the data will be held

Each annual declaration will be held for six years.

2.8 Safeguarding

A) Data held where a volunteer has raised a safeguarding concern with a school about a child

- A copy of the volunteer's report to the Number Champion Designated Safeguarding Lead and any subsequent correspondence. This will be held separately from the main database with only the Number Champions DSL, Alternate DSL, Chief Executive Officer, Head of Operations, and Chair having access. In particular, it will not be attached to or associated with the school, child, or volunteer record on the database.

Purpose

In the event that the volunteer's concern was not recorded on the school's safeguarding system, to maintain a detailed record of the concern in order (i) for the school to use should it open investigations at a later date and (ii) that in the event that there is a dispute at a later date, to prove that the volunteer did raise a concern.

Basis of lawfulness

Statutory duty of the charity to safeguard children

Legitimate interest of the volunteer to have evidence held which in certain circumstances might provide legal protection.

Transfer of data

In the event that Number Champions considers that it is necessary for the protection of an individual it shall transfer data to the relevant school or to an appropriate government agency.

Otherwise, it shall transfer data only as required by law.

Period for which the data will be held

10 years

B) Data held where a volunteer or other member of personnel has raised a safeguarding concern other than as in A) above

- A copy of the volunteer's report to the Number Champion Designated Safeguarding Lead and all subsequent material gathered in the investigation. This will be held separately from the main database with only the Number Champions DSL, Alternate DSL, Head of Operations, and Chair having access.

Purpose

To provide evidence of the concern and investigation.

Basis of lawfulness

Statutory duty of the charity for safeguarding.

Evidence of investigation which may be needed for legal or statutory purposes.

Transfer of data

In the event that Number Champions considers that it is necessary for the protection of an individual it shall transfer data to an appropriate government agency. Otherwise, it shall transfer data only as required by law.

Period for which the data will be held

10 years

2.9 Emails

Number Champions sends and receives a large volume of emails for different purposes from and to its “@numberchampions.org.uk” email system. (Formerly @numbersense.org.uk”.) Staff and trustees have email addresses on this system, along with a very limited number of volunteers who are given Number Champions email addresses because they need these for their role. The use of these addresses is covered by the Email policy.

The overall purpose of these emails is to enable the efficient governance and management of the charity. Some emails will contain information which the charity needs to maintain for 7 years to protect its rights for contractual purposes or to maintain its rights under contracts or for compliance. This could include specific emails relating to tax or Data Protection, but it could also include for example more general emails which are relevant to proving the charity’s practices in order to support an insurance claim.

It is not practical for a small organisation to create automated tools to identify which emails (i) contain personal information and at the same time (ii) no longer fulfil a legitimate purpose in being held by the charity.

Accordingly, the policy adopted here is:

To reduce the amount of sensitive personal information held on emails, whenever Number Champions receives ID documentation from a volunteer or staff member, then as soon as the relevant person has stored the ID documentation on our database they shall delete the original email and also any subsequent email in the trail which has the ID as an attachment. Any photo of an ID document on a mobile shall be deleted as soon as it is transferred to an email.

Purpose

To maintain records to allow the charity to run its activities efficiently.

Basis of lawfulness

Legitimate interest of the charity to have efficient record keeping to support its activities. This includes protecting its legal rights.

Legal obligation of the charity to maintain data required by statute.

Transfer of data

The charity will transfer the information in emails (which may involve forwarding emails) only after ensuring that this does not involve transferring person data which is not under a lawful basis.

Period for which the data will be held

7 years

If at the 7-year date, the senior employee of the charity identifies specific emails or classes of emails which they believe should not be deleted, then they shall keep these emails and document the reason for non-deletion. If these emails contain personal data, consideration shall be given to deleting this personal data within a copy of the retained email. The documentation for any non-deletion shall be reviewed and approved annually by the Board of trustees.

3) Security, Integrity and Confidentiality

- We will ensure that appropriate technical and organisational security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. Data subjects may apply to the courts for compensation if they have suffered damage from such a loss.
- We will put in place procedural and technological safeguards appropriate to our size, scope and business, our available resources and the amount of personal data we hold, to maintain the security of all personal data, from the point of collection to the point of destruction.
- We will consider and use, where appropriate, the safeguards of encryption, anonymisation and pseudonymisation (replacing identifying information with artificial information so that the data subject cannot be identified without the use of additional information which is kept separately and secure).
- We will regularly evaluate and test the effectiveness of these safeguards.
- Maintaining data security means guaranteeing the confidentiality, integrity and availability of the personal data, defined as follows: a) confidentiality means only people who are authorised to use the personal data can access it, b) integrity means personal data should be accurate and suitable for the purpose for which it is processed, and c) availability means authorised users should be able to access personal data if they need it for authorised purposes.
- Staff failure to follow rules on data security may be dealt with under our disciplinary procedure.

4) Breach Notification

- Where a data breach is likely to result in a risk to the rights and freedoms of the individual(s) concerned, we will report it to the Information Commissioner's Office within 72 hours of us becoming aware of it, and it may be reported in more than one instalment.
- Individuals will be informed directly if the breach is likely to result in a high risk to their rights and freedoms.
- If the breach is sufficient to warrant notification to the public, we will do so without undue delay.
- If you know or suspect that a data breach has occurred, do not attempt to investigate the matter yourself, but contact the CEO or a Trustee.