



Department  
for Education

**Cognition**  
Learning Group >

## Privacy Notice for the Teacher Mentoring Programme

This privacy notice has been written to ensure that Further Education (FE) and Training Providers interested in taking part in the Teacher Mentoring Programme (TMP) are made aware of how their personal data will be collected, processed and stored. This notice will provide you with information of who will have access to your personal data, how Cognition Learning Group (CLG) and the Department for Education (DfE) will use, store and delete your personal data.

This notice also provides you with the information needed should you wish to make a query about your data or how to make a complaint.

This privacy notice will be updated from time to time to reflect any delivery changes to TMP. We recommend that you revisit this notice frequently to ensure you are aware of changes to how we may handle your personal data.

**This notice was last updated on:** 11 July 2023

### Who is the data controller and processor

The DfE is the commissioner of the TMP and is therefore the data controller for all personal data processed within the TMP.

CLG has been awarded the contract by the DfE to deliver the TMP. This makes CLG the data processor as we will be collecting, processing and storing the data on behalf of the DfE.

CLG is committed to protecting your privacy and personal data we hold. We will only use your information to help us deliver our activities, provide a quality service and monitor the effectiveness of the programme.

### How your information will be used

All personal data collected / processed as part of the 2023-25 TMP, will be undertaken with the purpose of:

- Ensuring that providers and mentors are eligible and suitable for participating in the TMP.
- Allowing CLG to award and monitor grant funding\* to FE and Training Providers (\*if required).
- Allow CLG and DfE to undertake regularity checks to ascertain whether public funding has been used for agreed purposes and to take corrective action in the event of non-compliance. This may take place beyond the life of the programme.
- Collecting management information to monitor and track participant progress throughout their time on the TMP. This also includes participants signing up to short courses and masterclasses.
- As part of the TMP terms and conditions, FE and Training Providers, mentors and mentees will be required to participate in evaluation activities to enable CLG and DfE to measure impact, success, development areas, reach and value for money.
- Marketing of ongoing mentoring training opportunities delivered by CLG, on behalf of DfE.

TMP participants should note that their name and email address will be accessible by CLG's Quality and Evaluation colleagues who will use data to measure impact and identify areas for development. We also intend to track some participant journeys on the programme which will require us to use participant names and email addresses to do this (this activity will help us to measure programme impact from the start until the end of TMP).

Please note that any evaluation findings published by CLG and or DfE will remain anonymous and confidential. Unless given written permission, no individual or organisation will be identifiable.

### **What data will we be collecting**

The categories of personal data that we will be collecting will depend on which role you are fulfilling for TMP within your organisation. For the purpose of clarity, the following data will be required for Primary and Secondary Project / Grant Leads, Mentors and Mentees:

- First and last name
- Email address
- Organisation name
- Type of organisation
- Region(s) your organisation is based in
- Job title/role
- Subject/Provision taught

- Employment type
- Qualifications
- Whether a ring-fenced place was awarded\*

\* Ringfenced places allow us to recognise the diversity of the further education sector. 15% of programme places will be ringfenced for mentors who meet at least one of the following criteria:

- 1) either have a disability
- 2) are from black and/or minority ethnic communities
- 3) work in one of the 24 Priority Education Investment Areas.

The ringfencing of places has been designed to minimise the amount of special category data collected. Participants applying for one of these places will state which criteria they are applying under but won't be required to provide supporting evidence or detail about why they meet the criteria for a ringfenced place.

Please note that ringfencing data will remain within CLG and will not be shared outside of the organisation. This means that no individual outside of CLG can be identified for having applied for a ringfenced place.

If your organisation requires grant funding to participate in TMP, we will also require the following:

- Organisation bank details to pay the grant
- Hourly rates of mentors, mentees and Project / Grant Leads
- Grant reimbursement evidence (if requested)
- Full name and signatory of a person within your organisation who can approve grant claim submissions

Please note that grant claims are subject to a 10% sample check within each reporting period. The Head of Finance at CLG will oversee this process and review report and claim submissions made on the programme.

### **General Data Protection Regulation Information**

The DfE is the data controller for your personal data. We must have a reason to collect your personal data. This is called a 'lawful basis'. We use the following lawful basis to process your personal data:

- For the purpose of the TMP, the processing of data is required for us to effectively deliver the programme. The lawful basis we rely on for processing your personal information is 6 (1)(e) - Public Task of the UK GDPR, this relates to processing necessary to perform a contract or to take steps at your request

before entering a contract. This is when we need your personal data to do our work, to provide or fund education.

- If your application includes special category data, such as ethnicity information, the lawful basis we use is article 9(2)(g) of the UK GDPR, which relates to processing which is necessary for reasons of substantial public interest which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject. Schedule 1(8) of the DPA2018 which sets out the conditions of substantial public interest whereby data will be collected and processed under the condition of 'Equality of opportunity or treatment.'

More information about how the DfE handles personal information is published [here](#).

A copy of CLG's Privacy Policy can also be seen [here](#).

### **Who has access to my personal data and where is it stored?**

#### **Cognition Learning Group:**

CLG employees who are directly delivering the TMP will have access to your data. Colleagues outside of the TMP team will only have access for specific activities related to their roles and purpose on the programme. For example, for quality, evaluation and financial purposes.

CLG will be processing data for the purposes outlined within this privacy notice. We are not intending to sub-contract to other organisations to process personal data on our behalf. Please note that this privacy notice will be updated and reviewed frequently to include any delivery changes. We recommend that you review this notice every six months to ensure you are kept informed.

All data will be processed by CLG staff and will take place in the EEA but in the UK where possible.

We use Zoho CRM to securely store TMP data. To see their privacy policy, please [click here](#).

#### **Department of Education:**

We may share your personal information with:

- organisations who may work for DfE to evaluate the impact, value for money and reach of programmes and the CLG offer;

- organisations that request information to help prevent and detect crime or fraud or investigate complaints;
- future delivery partners of the TMP should the programme continue beyond the end of the contract;

The [DfE Personal Information Charter](#) gives you more information on how we use your personal information.

### How long we will keep your personal data

The DfE and CLG will only keep your personal information for as long as is needed. We decide how long to keep your personal information based on the needs of the department and the law.

#### **Cognition Learning Group (data processor):**

CLG will only process data until the contract ends on 31 March 2025. We will keep data in our secure systems until 31 August 2025 for the purpose of auditing. However, should a two-year contract extension be exercised, CLG may process your data up until 31 August 2027. If enacted, this Privacy Notice will be reviewed and updated.

After this period, all data collected as part of TMP will be destroyed from CLG's systems. Where necessary, data in this period may be securely transferred to the DfE as the data controller (see below).

For further information on CLG's data procedures, please see our [Privacy Statement](#) and [Privacy Policy](#).

Our approach outlined above is in line with the DfE's personal information charter. For more information on this, please click [here](#).

#### **Department of Education (data controller):**

Once returned, the DfE will retain personal data as long as needed to complete auditing processes. Your data may be shared with future delivery partners of the TMP, should the programme continue beyond the end of the contract. However, should funding for all current and future iterations of the teacher mentoring programme come to a close, the Department will only retain your personal data for up to 6 months after programme closure to respond to potential departmental audit queries.

DfE have robust measures in place to ensure that personal data is secure.

### Your rights over your personal data

You have rights about how and why your information is collected and used. These include:

- The right to see the personal information we have about you – this is called 'right of access'.
- The right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- The right to ask us to delete your personal information – this is called 'right to erasure'.
- The right to ask us to stop using your information – this is called 'right to restriction of processing', and
- Your 'right to object to processing' of your information

You have the right to ask for access to your personal information. This is known as a subject access request (SAR).

To make a SAR, or exercise any of the above rights, please contact us by emailing [privacy@cognitioneducation.com](mailto:privacy@cognitioneducation.com) or by using the 'Contact' button in the top banner of our website - <https://www.cognitioneducation.com/>.

Include as much information as you can about the information you need. Include the years you need the information for. If possible, tell us which part of the department holds the information. You'll also need to tell us your telephone number and address.

We may need to check your identity and your right to access the information you're requesting. To check you identify, we may ask for a copy of your passport, photo driving licence or proof of your address.

We'll try to respond to your request within one month. But, if your request is complex, this could take a further two months, but we'll tell you if this is the case.

If you have any questions for DfE about how your personal information will be used, please contact DfE at <https://www.gov.uk/contact-dfe>. For the Data Protection Officer (DPO) please contact DfE via [gov.uk](https://www.gov.uk) and mark it for the attention of the 'DPO'. For more information on your rights, please see the [ICO website](#).

If you have a question, or feel your data has been mishandled, you can contact us by:

using our secure [DfE contact form](#)

or writing to:

Emma Wharram

Data Protection Officer

Department for Education (B2.28)

7 & 8 Wellington Place

Wellington Street

Leeds  
LS1 4AW

You can also complain to the ICO by writing to:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113. Or use the online [ICO contact form](#)

### **The right to lodge a complaint**

If you are unhappy with the service we provide in relation to your personal data, please contact us by emailing [TMPcomplaints@cognitioneducation.com](mailto:TMPcomplaints@cognitioneducation.com). You have the right to complain to the Information Commission. The Information Commissioner can be contacted via:

- the website: <http://www.ico.gov.uk/complaints.aspx>
- or by telephone: 0303 123 1113

If you have a question, or feel your data has been mishandled, you can also contact the DfE by using their secure [DfE contact form](#).