

PRIVACY NOTICE

Barking and Dagenham School Improvement Partnersip (hereafter referred to as 'BDSIP') takes the security of the personal data we hold very seriously. This Privacy Notice tells you what to expect us to do with your personal information and how we use your personal information when delivering our education services. We have set out below the information we may use to deliver the services, who we may share it with and how long we will keep it.

BDSIP are the data controller of the personal information we process, unless otherwise stated. This means BDSIP determines the purposes for which, and the manner in which, any personal data is to be processed.

BDSIP are also data processors when we act on behalf of, and only on the instruction of, the relevant controller, e.g. schools.

Our Data Protection Officer will oversee and monitor our data protection procedures and ensure we remain compliant with the General Data Protection Regulation and Data Protection Act 2018.

What is personal information?

Personal information can be any information relating to a living person who can be directly or indirectly identified by reference to an identifier. A personal identifier includes your name, location, online identifier and identification numbers.

What personal information do we hold?

We only collect and use the minimum personal information required to deliver your service. Wherever possible we use non-identifiable personal information. The services may use some or all of the personal information below:

- Name and contact details
- Date of birth
- Family details
- Employment and education details including attainment, learning needs, special educational needs, school preferences, unique education identifiers
- Financial details including National Insurance Number
- Visual images, video footage, personal appearance and behaviour, photos
- Physical or mental health details including NHS number
- Race or ethnic origin
- Language
- Religious or other beliefs of a similar nature
- Criminal proceedings, outcomes and sentences
- Offences (including alleged offences)
- Your views on your experience of our services
- Location information where cookies are used on websites
- Judicial agencies
- Parties to legal proceedings
- Barristers' Chambers and external Counsel

- Previous claims history
- Legal representatives of other parties

We get most of this information from you, but we may also get some of this information from other educational providers, the London Borough of Barking and Dagenham, the Department for Education (DfE) and the National College for Teaching and Leadership, school settings, health agencies or providers, the Police, commissioned service delivery partners, family members, other local authorities, social care providers, vetting agencies, performance agents and legal representatives.

What is ‘Special Category’ personal information?

Some information is ‘special’ and needs more protection due to its sensitivity. It’s often information you would not want widely known and is very personal to you. This is likely to include anything that can reveal your:

- Sexuality and sexual health
- Religious or philosophical beliefs
- Ethnicity
- Physical or mental health
- Trade union membership
- Political opinions
- Genetic/biometric data

How do we use your personal information?

We use your information to:

- keep you informed about the course/programme/service you have signed up for
- safeguard children
- deliver your service
- plan and improve your service
- prevent or detect fraud or crime
- defend or bring legal claims
- evidence positive outcomes
- conduct research using anonymised information, if we would like to use your personal identifiable information, we will ask for your consent. If we rely on your consent you have the right to withdraw that consent at any time by telling us
- communicate as requested by BDSIP customers, including marketing our services, informing customers of changes to services and the general operation of our business

Who do we share your information with?

Sometimes we may need to share your information, but we will only do so where it is necessary or required by law. We will only share the minimum personal information for each circumstance.

We may sometimes need to share some of your information with:

- Commissioned service providers
- Other education providers e.g. schools, colleges
- Employers
- Safeguarding Boards
- Financial agencies e.g. Education Skills and Funding Agency, Pensions providers, Student Loan Company
- Government Agencies (e.g. Department for Education, Department for Works and Pensions (DWP), HM Revenue and Customs (HMRC), HM Court and Tribunal Service, Probation Service and Community rehabilitation companies, including Youth Offending Service)
- Health service providers including NHS Agencies (e.g. GPs, Hospitals, Ambulance, Health visitor, Speech and Language Therapists)
- London Borough of Barking and Dagenham local authority social care and education teams
- Other local authorities
- Performance agents
- Police
- Regulatory bodies e.g. Ofsted, Information Commissioner's Office (ICO), Ombudsmen, University/College Admissions Body, Vetting Agencies (e.g. Disclosure and Barring Service)
- Insurers, claims underwriters and insurance brokers

We also use Data Processors to support these activities, for example by providing the systems we need or to deliver services on our behalf.

What is the legal basis for our use of your personal information?

We collect and use your personal information in order to meet legal requirements and legitimate interests set out in the General Data Protection Regulation and Data Protection Act 2018.

Generally, we collect and use personal information where:

- You have given consent
- You have entered into a contract with us
- It's necessary to perform our statutory duties
- It's necessary to protect someone in an emergency
- It's required by law
- It's necessary for legal cases
- It's necessary for archiving, research or statistical purposes

If you have given consent for us to use your personal information you have the right to remove it at any time. If you would like to remove your consent, please contact our Data Protection Officer.

Will my personal information be accessible outside the UK?

Personal information is not routinely sent or stored outside the UK. Should the transfer of personal information outside of the UK become necessary, it will only take place if permitted by law, and then only where the appropriate safeguards are in place to protect the personal information.

How long will we keep your personal information?

We will only use your personal information whilst delivering the service to you and to deal with any questions or complaints that we may receive. We will keep personal information about you in compliance with our Record Retention and Deletion Policy unless the law requires us to keep it for a longer period.

BDSIP as a Data Processor

In certain cases, we also operate as a data processor and we collect and process personal information on behalf of our customers in the provision of our services. In these circumstances, we act as a data processor and our customers remain the data controller in respect of personal information they provide to us.

Our customers remain the data controllers with respect to any personal data that they provide to us for our provision of services. To the extent that we are acting as data processor, we therefore act in accordance with the instructions of the data controllers regarding the collection, processing, storage, deletion and transfer of customer information, as well as other matters such as the provision of access to and rectification of customer. We will only use such personal information for the purposes of providing the services for which our customers have engaged us.

Our customers are responsible for ensuring that these individuals' privacy is respected, including communicating to the individuals in their own privacy policies who their personal information is being shared with and processed by.

As a data processor, we may share personal information where instructed by our customers. Where authorised by the customer, we may also share personal information with third party service providers who work for us and who are subject to security and confidentiality obligations.

Where we act as a data processor, we will refer any request from an individual for access to personal information which we hold about them to our customer. We will not respond directly to the request.

We will retain personal information which we process on behalf of our customers for as long as needed to provide services and products to our customers and in accordance with any agreement in place with our customers.

Your rights

Your right of access

You have the right to ask us for copies of your personal information. This right always applies and is commonly known as making a 'subject access request'. There are some exemptions, which means you may not always receive all the information we process for example, if information is likely to cause serious harm to the physical or mental health or condition of you or any other person.

Information relating to or provided by a third person who has not consented to the disclosure, including images removed or obscured may also not be provided to you. If we can't give you some or any of the information, we'll tell you why.

To make a request for your personal information please contact our Data Protection Officer clearly stating:

- Your name and contact details
- The Information you want
- Any details or relevant dates that will help us process your request

We may ask you to prove your identity by providing us with a copy of your birth certificate/driving licence and/or utility bill.

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 holding 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

You also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances. If you would like to make a request, please contact our Data Protection Officer by emailing dpo@bdsip.co.uk

You also have the right to:

- object to processing of personal data in some circumstances
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance by contacting our Data

Protection Officer. Alternatively, you can contact the Information Commissioner at <https://ico.org.uk/concerns/>

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Further information on deleting and controlling cookies can be found at:

- www.aboutcookies.org
- www.allaboutcookies.org

Contact

If you have any queries about how your personal information is handled contact our Data Protection Officer at dpo@bdsip.co.uk

For independent advice about data protection, privacy and data sharing issues, you can also contact the Information Commissioner's Office at:

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

Tel: 0303 123 1113

Email: casework@ico.org.uk
www.ico.org.uk