



Privacy Notice

Under data protection law, individuals have a right to be informed about how our organisation uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about the children who use our services and those who have parental responsibility for them (referred to in this document as 'parents') and/or their nominated contacts.

We, **TURN Education C.I.C., Old Turnpike Cottage, Hollington Road, Stramshall, ST14 5EP** are the 'data controller' for the purposes of data protection law.

Our Data Protection Officer is **Caroline Hardeman-Mason**. If you need to contact our Data Protection Officer, please contact her at Caroline.hardemanmason@turneducation.co.uk 07734 543827

The personal data we hold

Personal data that we may collect, use, store and share (where appropriate) about children, parents and others using our services include, but are not restricted to:

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments

- Records of engagement with our services and progress made
- Characteristics such as ethnic background and special educational needs
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs
- CCTV images captured on site

We may also hold data about children which we have received from other organisations, including schools, local authorities and the Department for Education.

Why we use this data

We use this data to:

- Support your child's learning and development
- Monitor and report on your child's progress
- Provide appropriate pastoral care
- Protect your child's welfare
- Assess the quality of our services
- Inform parents and others of our services and events
- Comply with the law regarding data sharing

Our legal basis for using this data

We only collect and use childrens' and parents' (and/or their nominated contacts') personal data when the law allows us to do so. Typically, we process data on the following bases (which include, but are not necessarily limited to):

- Because you have given your consent to use the data in a particular way
- Because we have a contractual obligation
- Because we have a legal obligation
- In order to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use pupils', parents' or their nominated contacts' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and on each occasion that we contact you. We will also explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using childrens', parents' and their nominated contacts' personal data overlap and there may be several grounds which justify our use of this data.

Collecting this information

Some of the information we collect about your child and you is necessary in order for us to be able to deliver our services effectively. In other cases, the information is provided voluntarily.

Whenever we seek to collect information from you or your child we will make it clear whether providing it is a requirement for the provision of our service, or optional.

If it is a requirement for the provision of our service, we will explain the possible consequences of non-compliance.

How we store this data

We keep personal information about children, parents and their nominated contacts whilst those children are in receipt of the services of our organisation. We may also keep such information after your child's engagement with our services provided that we either have your consent to do so or because it is necessary to comply with our contractual and/or legal obligations.

If personal data are kept for longer or shorter periods of time than laid out in this document, the reasons for this will be documented.

Specific Retention periods:

Records relating to accidents, injuries or dangerous occurrences involving the child will be kept up to the service user's 25th birthday. Secure disposal.

Records relating to safeguarding, special educational needs and education, health and care plans will be kept up to the service user's 25th birthday. Secure disposal.

The above list is not intended to be exhaustive. The retention period for other records will be determined by risk assessment and statutory and contractual requirements on a case by case basis. Where appropriate, the organisation will be guided by sectoral standards and the Staffordshire County Council Retention Schedule.

Data sharing

We do not share information about children, parents or their nominated contacts with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and is in compliance with data protection legislation) we may share personal information with:

- *Relevant local authorities - where there is a legal obligation to do so*
- *Department for Education - where there is a legal obligation to do so*
- *The child's family and representatives - to meet our legal and contractual obligations to keep parents/carers informed of their child's progress and attainment.*
- *Other educators - where there is a legal obligation to do so or where the sharing of such information is in the best interests of the child's education and/or welfare*
- *Any relevant regulating body - where there is a legal obligation to do so*
- *Suppliers and service providers - to enable them to provide the service for which we have contracted them*
- *Financial organisations - to meet our legal and/or contractual obligations*
- *Our auditors - to meet our legal and/or contractual obligations*
- *Health authorities - to meet our legal obligations to share certain information for vital interest and safeguarding*
- *Health and social welfare organisations - to meet our legal obligations to share certain information for vital interest and safeguarding*
- *Professional advisers and consultants - to meet our public duty for teaching and learning*
- *Charities and voluntary organisations - to perform a task in the public interest where we have obtained consent to use it in a certain way*
- *Police forces, courts and tribunals - we will only disclose personal information where not doing so is likely to inhibit either:*
 - *The prevention or detection of a crime*

➤ *The apprehension and prosecution of offenders*

The above list is not intended to be exhaustive.

Transferring data internationally

Whilst it is not envisaged that personal data will be transferred to a country outside the European Economic Area, if that should be the case we will do so in accordance with data protection legislation.

Parents and childrens' rights regarding personal data

Individuals have a right to make a 'subject access request' to gain access to personal information that the organisation holds about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12) or where the child has provided consent.

Parents also have a right to make a subject access with respect to any personal data the organisation holds about them.

If you make a subject access request and if we do hold information about you or your child, 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 or your child
- Tell you who it has been, or will be, shared with

- Give you a copy of the information in an intelligible form

Individuals also have the right for their 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 - **Caroline Hardeman-Mason** at Caroline.hardemanmason@turneducation.co.uk 07734 543827

Other rights

Under data protection legislation, individuals have certain rights regarding how their personal data are used and kept safe, including the right to:

- Object to the use of personal data if such use would cause, or is causing, damage or distress
- Prevent it from being used to send direct marketing
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our Data Protection Officer.

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our Data Protection Officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer.