

# CPotential and Woodstar School Privacy and Data Notice

## 1. Privacy

We are committed to protecting and respecting your privacy. This Privacy Notice sets out the basis on which we will process any of your personal information you supply to us in compliance with the **General Data Protection Regulation (GDPR)**.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

We may collect and process the following information such as your name, contact details and information you provide about your child or yourself as potential users of our services that you provide by filling in an online Contact Us Form or Request for Assessment Form on our [website](#).

Under the terms of GDPR, the Data Controller is CPotential Trust, 143 Coppetts Road, London N10 1JP.

## 2. Information we may collect from you

We may collect and process the following information about you:

- a. Information such as your name, contact details and information you provide about your child or yourself as potential users of our services that you provide by filling in an online Contact Us Form or Request for Assessment Form on our [website](#).
- b. Information you provide if you complete and submit a Staff Application Form or Volunteer Application Form either via email or in hard copy.
- c. CVs and covering letters in application for jobs at CPotential or Woodstar School.
- d. Information that you provide by filling in a hard copy form, for example:
  - a sheet inviting you to sign up to subscribe to our free email newsletter
  - forms, e.g. Medical Form, Child Photograph and Video Permission Form, Home-School Agreement for parents using our services
  - forms relating to our assessment service for the Mollii Suit assistive device
  - donation pledge cards at fundraising events.
- e. If you contact us in person, by email or telephone or for a meeting, we may keep a record of that correspondence or interaction.

### **3. Information we may collect from other sources**

#### ***For fundraising and donation purposes:***

We may collect information such as contact details and basic personal information from publicly available sources in order to determine your capacity to support or fundraise for CPotential, and to send you invitations to do so if such indications are positive, along with other fundraising communications such as event invitations.

Only the minimum information necessary for the above purposes will be collected, as a legitimate interest in accordance with the GDPR.

We will always inform you at the earliest opportunity of this processing, which is subject to your right to opt out at any time (see Section 10).

If you have not heard from us or submitted your details but have received a fundraising communication containing a reference to this document, you may assume that the above case applies.

The information collected will never consist of sensitive personal data, as defined in Section 2 of the GDPR, without your prior informed consent.

If you have pledged a significant donation, or you have indicated that you are likely to do so, we may also collect additional information about you from a wide range of publicly available sources, in line with CPotential's due diligence policy and our responsibilities as a charity.

It may be necessary in this case to process sensitive personal data. In which case, we will not disclose this to any third party, with the exception of when we outsource processing where we will remain the data controller.

### **4. Staff recruitment and staff management**

#### ***The purposes for which we hold or processes personal data:***

- Recruitment
- Performance Management
- Remuneration including benefits
- Responding to bodies entitled to access under relevant law, regulations, and legislation
- Provision of Regulatory References

***The persons with whom data may be shared:***

- CPotential Trust and/or the management of its subsidiary/associated companies
- Bodies or organisations entitled to access under relevant law, regulations, and legislation
- Organisations that need data to administer employee benefits
- Other organisations or persons requested from time to time e.g. bank or mortgage references.

***How long data may be held for:***

- If you are employed by CPotential Trust and/or its subsidiary/associated companies in a managerial capacity, your data will be held for a period of seven years after the date you leave our employment, to meet obligations to provide regulatory references.
- If you are employed in any other capacity, your personal data will be retained for a period of up to two years after the date you leave our employment.

***Accessing personal data or asking for personal data to be erased***

- You can submit a Subject Access Request to the Data Controller, who will respond to you within the time frames set out in the Subject Access Request Procedure.
- There may be limitations to what can be erased, for example, where there are obligations to provide regulatory references.
- For more information, please refer to Section 11 – Your rights to information.

**Pupil and parent information**

***We hold or process the following personal data:***

- Contact and other information provided by parents
- Child's medical information
- Photo and filming permission
- Child's assessment and progress reports

For pupils at Woodstar School with an Education, Health and Care Plan: We pass on pupil records to the child's next educational provider and retain a copy for 25 years.

For children who attend our Early Intervention and Sessional Services: We retain records for a minimum of six years and up to 25 years.

## **5. Where we store your personal data**

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. All information you provide to us is stored securely.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

We may transfer your personal data to destinations outside the European Economic Area (EEA). Where we do we will ensure that it is treated securely and in accordance with the legislation.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. However, our site could be subject to unauthorised access and, though we take steps to prevent this, we cannot guarantee that it will not occur.

By submitting your personal data, you agree to this transfer, storing or processing.

## **6. How we use your personal data**

We may use information held about you in the following ways:

- a. To contact you by email, phone or post (if you have provided your contact details) so that we can provide you with information or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- b. To carry out our obligations arising from any contracts entered into between you and us.
- c. To allow you to participate in interactive features of our service, when you choose to do so.
- d. To notify you about changes to our service.
- e. To provide you with information about other services we offer that are similar to those that you have already enquired about.
- f. To send fundraising communications inviting you to support CPotential or to attend our events, in accordance with the GDPR and with the Privacy and Electronic Communications Regulations of 2003 (PECR), and where such communications are judged reasonable and not intrusive. Data that you provide us for other purposes, e.g. making an enquiry on our website, will not be used for this purpose.
- g. To conduct research on you if you are a prospective donor for due diligence purposes (as described in Section 3) in accordance with our responsibilities as a charity.

## **7. Retention period**

Your data will not be retained for longer than necessary and will be managed in accordance with our data retention policy. Where we are required to retain the data for legal or regulatory requirements this will override any request for information to be deleted.

## **8. Disclosure of your information**

We may disclose information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements or to protect the rights, property or safety of CPotential, our service users or others.

We may also share data with a designated data processor, for example to process communications that are sent. In this case, the processor is bound by a contract to only act on our instructions, as well as to enact security at least as equivalent to ours.

Apart from the circumstances above, we will never share your personal data with third parties without your explicit consent to do so.

## **9. External links and website policy**

See [web privacy statement](#)

Our site may, from time to time, contain links to and from the websites of partner organisations or supporters. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. We recommend that you check these policies before you submit any personal data to these websites.

## **10. Your rights – consent to direct marketing**

Wherever we invite you to opt in to receive communications and marketing from CPotential, we will include clear information.

If you have opted in to receive news from CPotential and later decide to cancel this, you can do this at any time by writing to CPotential either:

- by email to [info@cplondon.org.uk](mailto:info@cplondon.org.uk) or
- by letter to the Marketing and Communications Manager, CPotential, 143 Coppetts Road, London N10 1JP

If you have opted in to receive our free email newsletter you may cancel this subscription at any time via the unsubscribe link on the newsletter.

We will hold basic information, i.e. your name, relevant contact details, and date on which you requested no further contact, to ensure that you are not contacted in the future by accident.

## **11. Your rights – access to information**

The GDPR gives you the right to access information held about you.

You may make the request in writing (either email or hard copy) to CPotential. Within 30 days of receipt of this, we will send you a summary of:

- whether any personal data is being processed
- what personal data is held, the reasons it is being processed and whether it will be given to any other organisations or people.

We may refuse to comply with a request if it is manifestly unfounded or excessive or repetitive in nature.

If we consider that a request is manifestly unfounded or excessive we may:

- request a reasonable fee to deal with the request or
- refuse to deal with the request.

In either case we will inform you without undue delay and within one month of receipt of the request, giving:

- the reasons we are not taking action
- your right to make a complaint to the ICO or another supervisory authority
- your ability to seek to enforce this right through a judicial remedy.

We will send you a copy of the information comprising the personal data held, and details of the source of the data (where available).

If you submit your request via email, please send it to [info@cplondon.org.uk](mailto:info@cplondon.org.uk) with the phrase “Subject Access Request” in the subject line.

For further information on Subject Access Requests please visit the Information Commissioner’s Office [website](#).

## **12. Changes to our privacy policy**

We will post any changes we make to our Privacy Policy in the future on our website.

## **13. Comments or queries**

If you have any questions, comments and requests regarding this Privacy Policy please contact us at [info@cplondon.org.uk](mailto:info@cplondon.org.uk) or write to us.

The accuracy of your individual identifying information is important to us. If you change your email address or any other information that we hold about you, please tell us either by email or post

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