

BANHAM

ACADEMY

Privacy Policy

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1. Introduction

When Banham Academy collects personal data from individuals, the requirement for 'fairness and transparency' must be adhered to. This means that we must provide data subjects with a privacy policy to let them know how and for what purpose their personal data are processed. Any data processing must be consistent or compatible with that purpose.

This policy details how we collect your data, what we use it for and how to make changes to the way we are using it. Looking after the personal information you share with us is important.

Banham Academy collects personal data to:

- enable us to deliver the education and training services you have requested
- meet any regulations and requirements from our regulatory bodies, such as the Education & Skills Funding Agency (ESFA) and Ofsted
- understand any additional support requirements, you may have.

2. Scope

This policy applies to the handling of personal data where Banham Academy is the data controller or a data processor of personal data. The policy applies regardless of who created the data, where it is held, or the ownership of the equipment used.

3. Purpose

The purpose of this policy is to ensure Banham Academy meets its obligations under the Data Protection Act 2018.

4. Roles & Responsibilities

All users of personal data within Banham Academy must ensure that personal data is held securely and not disclosed to any unauthorised third party either accidentally, negligently, or intentionally. The Banham Academy Operations Director has overall responsibility for the implementation of this policy and its effectiveness.

5. About this policy

- The protection of your privacy and personal information is important to us. We will ensure appropriate security measures are in place at Banham Academy and with any other organisation we work with, providing a service meets our high standards.
- We will respect your privacy and only use your information for marketing with your prior consent.
- We will make it clear at the point when we request your information, what we are collecting it for and how we are going to use it.
- We will collect and use your personal information only if we have your permission or have sensible business reasons for doing so.

- We will minimise the amount of information we collect from you to what we need to deliver the services you have requested.
- We will be clear in our dealings with you as to what information about you we will collect and how we will use it.
- We will use personal information only for the purposes for which it was originally collected, and we will make sure we store it safely, and delete it securely.

If we transfer any information out of the European Economic Area (EEA), it will only be done with the relevant legal instruments or permissions being in place.

6. Information we may collect about you and how we use it

- When you ask us to deliver a service
- When you contact us for information
- When you book an appointment
- When you use the website
- via 'cookies'
- If you choose to reveal information in postings
- If you complete your details on customer feedback surveys or research questionnaires

This personal information may include but is not limited to the following information about you:

- Your name (including your first names and surname)
- Your email address
- Other details about you that you or others provide to us; and
- Sensitive personal data but only where you have provided your explicit consent for the collection of and use of such sensitive personal data

7. Why we collect data

We must tell you the reason for collecting your information – and this is called the lawful basis for processing.

- Where you provide information in the course of a Service Agreement e.g., to deliver training to an apprentice, we process your data under Contract, so your data is necessary to fulfill the service you are agreeing to.
- Any additional contact, i.e., telling you about another service closely related to the service you have contracted is managed under legitimate interest.
- When you sign up to receive more information about our services, we manage this under consent because you told us you wanted to receive it.

We will always make it as easy as possible for you to opt out of unwanted processing, providing it does not restrict our ability to provide you with the service you have requested.

8. How long do we hold on to your data?

To ensure fair processing, Personal Data will not be retained for and longer than necessary in relation to the purposes for which it was originally collected, or for which it was further processed.

Banham Academy expects that: records and information should only be retained for legitimate business use and must not be retained for longer than is necessary for its lawful purpose.

We will keep information about learners, study, and achievements indefinitely in order that we may provide academic references as requested. However, we will cease processing information about students, study, and achievements, except where the data subject consents or for statutory and compliance reasons after 5 years.

9. ESFA Tier 1 Privacy Notice

The information you supply is used by the Learning Records Service (LRS). The LRS issues Unique Learner Numbers (ULN) and creates Personal Learning records across England, Wales, and Northern Ireland, and is operated by the Education and Skills Funding Agency, an executive agency of the Department for Education (DfE). For more information about how your information is processed, and to access your Personal Learning Record, please refer to: <https://www.gov.uk/government/publications/lrs-privacy-notice>

10. Children's Data

We do not knowingly collect or store any personal information of children under the age of 16, except within the context of the provision of our services.

11. Updating your personal information

Under current data privacy legislation, you have the right to rectify, erase or restrict the processing of your data without undue delay. You may also request access to the data we hold on you. Please note, that in the context of the services we provide, some data cannot be erased or rectified due to current legal obligations. If you need to change any details, please contact us.

12. Who we share data with

We do not and will not, sell or share your information at any time to anyone else for marketing purposes. We do not share your information with anyone else because your data and security is extremely important to us and customer confidentiality is key. If we need to for any reason, we will let you know in advance, unless someone in a legal capacity tells us we cannot.

13. Transfer outside the European Economic Area

If we need to send any information outside of the EEA, this will only happen with appropriate legal protections / permissions.

14. Cookies

Cookies are packets of data that sit on our website, in some cases to make it work, and in some cases to collect visitor behaviour information. Here is a link to the Banham Cookie Policy <https://www.banham.co.uk/cookie-notice>

15. Google Analytics

We use Google Analytics on our sites for anonymous reporting of site usage. If you would like to opt-out of Google Analytics monitoring your behaviour on our sites, please use this link <https://tools.google.com/dlpage/gaoptout>

Here is a link to the Banham Privacy Policy <https://www.banham.co.uk/privacy-promise>

16. Who we are

Banham Academy is a company registered in England with the number 07531574. Our address is 20 Thornsett Road, London, SW18 4EF. We are registered as a data controller with the Information Commissioner's office – our registration number is ZA070839.

If you would like to contact us, please email info@banhamacademy.com or contact us by telephone on 020 7622 5151.

17. Your right to complain

If you are not satisfied with the way your request was handled, you have the right to lodge a complaint with the Information Commissioner's Office:

Information Commissioner's Office <https://ico.org.uk/make-a-complaint/>

Telephone: +44 303 123 1113

18. Changes to our privacy promise

If we make changes to this document, we will show you what they are here. If these changes are significant, we may also choose to email relevant individuals with new details. If we are required by law, we will obtain your consent to make these changes.

19. Complaints

If an individual feels that this policy has been unfairly applied, or not followed properly, they should speak to a member of the Banham Academy team. If still not satisfied, they should follow Banham Academy's Complaints policy.

20. Policy Review

This policy will be reviewed by the Banham Academy Operations Director annually and updated, as necessary.

21. Breach of the policy

Any breaches of the policy will be investigated and where appropriate, will be considered in line with staff disciplinary procedures.

22. Access to the policy

A copy of this policy will be provided at induction for apprentices and on appointment for staff.

23. Legislation on which the policy is based

The Data Protection Act 2018