



## Privacy Policy

### How we use your information

This privacy notice tells you what to expect when Stable & Wild collects personal information. It applies to information we collect about:

- people who sign up for our programs
- people who use our services, e.g. who subscribe to our newsletter or request information from us
- job applicants and our current and former employees
- visitors to our websites
- complainants and other individuals in relation to a data protection or freedom of information complaint or enquiry

### Students who register on our programs

When a student registers on one of our programmes we will hold details on file to be able to deliver the programme service.

### **The categories of student information that we collect, hold and share include:**

- Personal information (such as name, unique pupil number and address)
- Characteristics (such as ethnicity, language, nationality)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Records of academic achievement and personal development that takes place during your sessions with us
- Relevant medical information, previous education history, special educational needs and behavioural information
- Why we collect and use this information

### **We use this student data:**

- to support student learning
- to monitor and report on student progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing



### **The lawful basis on which we use this information**

We collect and use student information under Article 6 of EU General Data Protection Regulations (GDPR) to ensure the company carries out its duties lawfully and appropriately.

### **Data is required:**

- to process personal data for a specific purpose (6a)
- for compliance with our legal obligations (6c)

Consent will be required and requested using our Individual Learner Assessment (ILA).

We also collect and use student data under Article 9 of EU GDPR for data collection purposes which is required under the Education Act 1996, such as the child's racial or ethnic origin, and religious beliefs.

### **Collecting student information**

Whilst the majority of student information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain student information to us or if you have a choice in this.

### **Storing student data**

We hold student data for as long as it is required for operational purposes or for legal reasons.

### **Who we share student information with**

We routinely share student information with:

- schools who commission our provision
- agencies who have a legal right to access
- the Department for Education (DfE)
- other commissioning bodies

### **Why we share student information**

We do not share information about our students with anyone without consent unless the law and our policies allow us to do so.

We share students' data with the schools and commissioning bodies as they require this for the Department for Education (DfE) on a statutory basis. This data sharing underpins programme funding and educational attainment policy and monitoring. We are required to share information about our students with our commissioners under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.



Where our commissioners are academies or free schools, we are required to share information about our students with the (DfE) under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

Where our commissioners are Pupil Referral Units we are required to pass information about our students to the Department for Education (DfE) under regulation 4 of The Education (Information About Individual Pupils) (England) Regulations 2013.

### **Requesting access to your personal data**

Under data protection legislation, parents and students have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, please write to the: Data Protection Officer, Stable & Wild, Unit 9, Manor Farm, Main Road, Astwood, Bucks MK16 9JS

### **You also have the right to:**

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- 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. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns>

### **Subcontract arrangements**

Where Stable & Wild are contracted to deliver services by a third party, information will be shared in order to deliver the correct and most appropriate programme. Information will be provided to the commissioner on progress, attendance and any other information deemed relevant to support the needs and progression of that individual. Data sharing agreements and parental consent will be obtained prior to this information being exchanged. Once the student leaves Stable and Wild, the data will be destroyed unless it is necessary to retain it e.g. for Princes Trust verification or to comply with our legal obligations.

This information will be stored securely at our Head Office and will only be used for the purposes it is retained.

Any breach of these arrangements will be reported to the ICO as soon as it is discovered.



### **Photographs, videos and case studies**

Photographic records are kept of students attending our programmes and these will be printed off for students' portfolios. Photographs are removed from memory cards on a half termly basis. Permission will be obtained for the taking of photographs or videos.

From time to time we may ask for permission to use a photograph or video for promotional purposes to include on literature, our website or social media. Written consent will always be obtained before these are used, and where consent is not given, we will not show faces, or we will use models to stand in, so an individual cannot be identified.

Case studies will always have names changed and they will not contain any information that identifies a student, unless written consent has been given.

### **Marketing Stable and Wild services**

Stable and Wild offers various services to customers and potential customers. If you have requested information via our "Contact Us" Section on the website, then you may receive information on this area of interest. You may also receive our newsletter if you have asked to receive this information. We will not pass your details on to other third-party organisations and if you no longer require information then you can unsubscribe from this service.

### **Job applicants, current and former employees**

When individuals apply to work at Stable and Wild we will only use the information they supply to us to process their application and to monitor recruitment statistics. Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from the Disclosure Barring Service, or for the Prevention of Crime and Fraud, we will not do so without informing them beforehand unless the disclosure is required by law.

Personal information about unsuccessful candidates will be held for 12 months after the recruitment exercise has been completed, it will then be destroyed or deleted. We may retain anonymised statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.

Once a person has taken up employment with Stable and Wild, we will compile a file relating to their employment. The information contained in this file will be kept secure and will only be used for purposes directly relevant to that person's employment. Once their employment with the company has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it.



### **Visitors to our website**

When someone visits [www.stableandwild.co.uk](http://www.stableandwild.co.uk) and we want to collect personally identifiable information through our website, we will be:

- up front about it
- make it clear when we collect personal information
- explain what we intend to do with it

We use Google Analytics to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone.

### **Security and performance**

We use a third-party service to help maintain the security and performance of our website. In completing this service, they DO NOT process the IP addresses of visitors to the website.

### **People who email us**

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

### **People who make a complaint to us**

When we receive a complaint from a person, we may need to make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. We will only use the personal information we collect to process the complaint and to check on the level of service we provide.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle. Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.



### Use of cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The table below explains the cookies we use and why.

Cookie	Name	Purpose
Google Analytics	_utma _utmb _utmc _utmz	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. <a href="#">Read Google's overview of privacy and safeguarding data</a>
Contact Form Driven by Google Forms	_ga _gat	This cookie is essential for the submission of the Contact us form to Stable and Wild. The form uses Google forms. <a href="#">Read Google's overview of privacy and safeguarding data</a>
YouTube cookies		We may embed videos from YouTube using YouTube's privacy-enhanced mode. This mode may set cookies on your computer once you click on the YouTube video player, but YouTube will not store personally-identifiable cookie information for playbacks of embedded videos using the privacy-enhanced mode. Read more at <a href="#">YouTube's embedding videos information page.</a>
Google web fonts.	fonts.google apis.com	Web based fonts that can be deployed in websites from Google. See <a href="https://developers.google.com/fonts/">https://developers.google.com/fonts/</a>

### Complaints or queries

Stable and Wild tries to meet the requirements of the GDPR when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.



This privacy does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

### **Access to personal information**

Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 1998, and the GDPR. If we do hold information about you, we will:

- give you a description of it
- tell you why we are holding it
- tell you who it could be disclosed to
- let you have a copy of the information in an easy-to-read form

To make a request for any personal information we may hold you need to put the request in writing addressing it to our Data Protection Officer at the address provided below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes by contacting our Data Protection Officer.

### **Disclosure of personal information**

In most circumstances we will not disclose personal data without your consent. However, in some circumstances there will be a need to disclose information without consent. Typically, this will be for the prevention of crime, fraud, terrorist activity and safeguarding young and vulnerable people.

We take into consideration if the information could be sourced from other places first before we disclose, and if needed will only respond to a court order.

### **Changes to this privacy notice**

We keep our policies updated at least once per year or on significant legal changes.