



# Privacy Policy

## Warwickshire Early Years Hub

Warwickshire Early Years Hub (WEYH) is committed to protecting your privacy and is subject to the Data Protection Act (DPA) 2018 and the General Data Protection Regulation (GDPR), which protects the rights of individuals and details what organisations can and cannot do with information. This Privacy Policy explains what information we collect when you interact with us via phone, email, in person or online and how we handle the personal information we receive about you that enables us to deliver our traded service.

We will ensure that personal data is collected, handled, stored and shared in a secure manner. We value your privacy and want to be clear about the data we collect and process. Data will never be sold to third parties. All data collected and stored by Warwickshire Early Years Hub is for the sole purpose of our operational business and/or contractual requirements and in the interests of the individual's relationship with our organisation.

This includes, but is not limited to communication regarding the training we offer, marketing of events, notification of publications and news updates. Warwickshire Early Years Hub is the data processor of your personal data and a data controller of personal data related to its staff.

**What this policy considers:** Our privacy policy considers several legal instruments, including:

- the Data Protection Act 2018
- the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by The Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011
- Directive 2009/136/EC of 25 November 2009 ("The European Union Cookie Directive").
- General Data Protection Regulation (GDPR)

### How we collect information about you

We collect information about you whenever you interact with us. For example, when you register for one of our courses, contact us for information or book one of our courses via the website. We may also take information from you if you approach us to request bespoke training or advice and support within your organisation

### What information do we collect?

We process the personal data of individuals, enrolling on our training courses, early years events and other individuals who may access our services for the provision of skills and knowledge development.

When you interact with us, we may collect names, addresses, email addresses, contact details, information about your booking. If you are enrolling on to a course, we may need telephone numbers, dates of birth and sometimes medical information, for example, if you might need help to access a training location.

The information you provide is used to enable us to complete your booking and may also be shared with our associates, third party providers who we may need to work with to deliver services for our training courses.

**\*Card payments are processed by Stripe – your card details are not retained by WEYH.**

We use your data to facilitate communication (name, email address, contact number) to enable us to deal with any questions or concerns you may have and to ensure exchange of resources related to the course you are attending. We do not use cookies to collect this type of information.

We may also collect some, or all, of this information when you visit our website, depending on how you use it.

We monitor how people use our website so we can improve it. However, you can use our website anonymously without giving us any information and we won't know who you are.

If you visit our site anonymously, we may record information about:

- the areas of the website you visit
- the amount of time you spend on the site
- whether you are new to the site, or have visited it before
- how you came to our website - for example, through an email link or a search engine the type of computer, browser, network location and internet connection you use.

**We use your information to:**

- Give you the products, information or services you have requested
- Keep you in touch with our work by sending you updates, e.g. when your safeguarding training is due to expire
- Enrol you on a course
- Provide attendance registers to trainers
- Ensure compliance with contractual requirements for relevant external agencies, for example the DfE – data is anonymised
- Assist production of statistical information for to help improve the service we offer
- Support communication with individuals and groups using our services
- Monitor complaints, or disputes and manage these
- Monitor equality and diversity objectives within the business
- Ensure safeguarding and learner and staff welfare
- Ensure safety and security, including that of the learning and working environment;
- Administer the financial activity related to delivery of the service
- Monitor the quality of the service we deliver through delegate evaluations and associate trainer evaluations
- Plan the content of our traded service offer

**Your consent**

By giving us your personal information, including sensitive personal data like information about your health, you consent to us collecting and using that information in the ways that we describe in this privacy policy.

You also consent to us transferring your information to countries or jurisdictions which may not provide the same level of data protection as the UK, if necessary for any of the above purposes. If we do transfer your information in this way, we will comply with our legal obligations as a data controller under the Data Protection Act 1998 and, if we need to, put in place a contract with the companies we use to process information to ensure your details are properly protected.

**How we protect your personal information**

All staff and any other relevant individual who handles personal information, of which Warwickshire Early Years Hub is responsible for, must follow the requirements of the Data Protection Policy.

We take appropriate physical, electronic and operational measures to ensure that we keep your information secure, accurate and up to date, and that we only keep it if is reasonable and necessary. Although we use appropriate security measures once we have received your personal information, the transmission of information over the internet is never completely secure. We do our best to protect personal information, but we cannot guarantee the security of information transmitted to our website, so any transmission is at the user's own risk.

**\*Card payments are processed by Stripe - our payment processing partner provider, according to the Payment Card Industry Security Standards. Your card details are not retained by Warwickshire Early Years Hub.**

**Personal Data Sharing**

On occasion we share personal data with wider organisations in order to meet statutory requirements or to provide the services we offer at an operational level. Sharing will be undertaken in line with the requirements of data protection law, either through the consent of the individual, or another relevant legal channel. The personal data that is shared will be limited precisely to what the other organisation needs to meet its requirements or deliver its services. The information below outlines the partners with whom Warwickshire Early Years Hub shares personal data with on a periodic basis.

Our employees, agents and contractors where there is a legitimate or legal reason for their receiving the information, including:

- third parties who work with us to provide specialist training service
- third parties who are contracted to provide IT services for us
- internal and external auditors

Those with an interest in tracking progress and attendance, including:

- Current or potential employers
- Professional and regulatory bodies
- Government departments / agencies where we have a statutory obligation to provide information (e.g. the DfE)
- National/Local Government Departments and other public bodies e.g. Ofsted
- Crime prevention or detection agencies (e.g. the police, the Department for Work and Pensions)
- WTSA insurers and legal advisers to provide insurance cover or in the event of a claim
- Employers who request a reference from the WEYH

**Data Retention:** We do not hold personal data for any longer than is necessary.

*Data retention periods:*

- Course enrolment data will be retained for 12 months
- Learner data will be retained as per contractual requirements for example training or support accessed via funding from external sources, such as a DfE grant
- Non-government funded training services delegate and learner data will be retained for 3 years post training delivery
- Staff data will be retained for 7 years following the date of leaving employment

**On the website generally:**

We use Google Analytics to understand how people use our website so we can make it more effective. Google Analytics collects anonymous information about what people do on our website, where they've come from, and whether they've completed any tasks on the site, for example, signing up for a course. Google Analytics tracks this information using cookies and JavaScript code.

**Our staff and Associate Trainers / Consultants:** We collect the following information:

- **Staff Details:** Name and address, National Insurance number, Contact details (telephone number, email address), Self-declaration of permission to work in the UK, Relevant qualifications or indication of highest qualification held Professional development / training and membership of any professional body, Employment history, Supporting statement, Referee details, Criminal record disclosure, Declaration about any disability as defined under the Equality Act 2010
- **Once a candidate has been made an offer of employment:** Bank details, Emergency contact details, Beneficiary declaration, Qualification information required to be shared with awarding bodies, Health information, DBS compliance check, IR35 Compliance check if self-employed. Right to Work in the UK evidence (as prescribed by the Home Office)

Further personal data captured about an employee is likely to relate to any performance or appraisal process and any information needed to maintain a sickness/absence record.

**Personal Data Rights:** Under the DPA you have the following rights to:

- Obtain access to, and copies of, the personal data that we hold about you
- Require that we cease processing your personal data if the processing is causing you damage or distress
- Require us not to send you marketing communications

**Under GDPR you have the following additional rights to:**

- Require us to correct the personal data we hold about you if it is incorrect
- Require us to erase your personal data
- Require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal)

- Receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including the purpose of you transmitting that personal data to another data controller
- Object, on grounds relating to your personal situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights

*Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.*

## **How to change the personal information we hold about you: Corrections and withdrawing consent**

### **Data Corrections**

If you want to update the information we hold for you, or you think any information we have about you is incorrect or incomplete, please get in touch as soon as possible. Or, if you have given your consent and you wish to withdraw it, please contact us using the contact details set out below.

Write	Call	Email
Warwickshire Early Years Hub C/o: Bedworth Heath Nursery School, Glebe Avenue, Bedworth, Warwickshire, CV12 0DP	07795 367337	<a href="mailto:Admin.vey@welearn365.com">Admin.vey@welearn365.com</a>

*Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.*

### **Subject Access Request:**

An individual has the right to ask Warwickshire Early Years Hub what personal data we hold about them, and to ask for a copy of that information. Any request should be submitted in writing to the nominated data point of contact or in hard copy to the postal address provided. WEYH reserves the right to ask for proof of identification and for further clarification of the request if it is unclear in the first instance. You will receive a reply no longer than 30 calendar days from the date you make the request in writing.

If you are unhappy with the initial response you can ask us to undertake a further search if there is specific information you have good reason to believe exists but that hasn't been provided. You could also contact the Schools DPO: [schooldpo@warwickshire.gov.uk](mailto:schooldpo@warwickshire.gov.uk)

You also have the right to complain to the UK Regulator the Information Commissioner's Office (ICO's) if you believe your request has not been dealt with properly or you have a complaint to raise against WYSA for any other data protection related issue. A complaint can be raised via the ICO's website.

You also have the right to withdraw consent from the processing of your personal data by WEYH at any time, if your consent was sought initially to use your personal data.

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner. You can find out more about your rights under data protection legislation from the Information Commissioner's Office website available at: [www.ico.org.uk](http://www.ico.org.uk)

Our privacy policy may change from time to time, so please check our website occasionally to see if we have included any updates or changes, and that you are happy with them.

*Last updated: July 2022*