



# **Support Services for Educations Harrow (ss4e) Privacy Notice**

Harrow Council/ss4e are committed to ensuring that your privacy is protected. This Privacy Notice explains how we process and manage any personal information we collect about you when you use our services, book on to training programmes or access information via our support services for education Harrow portal, www.ss4eharrow.uk

## **Changes to our Privacy Notice**

We keep our privacy notice under regular review

#### Introduction/Who are we?

Support Services for Education Harrow comes under Harrow council and is the name for the online platform in providing training and consultancy to the education sector. SS4E service users include schools staff, staff in further education, staff in early years settings (private, voluntary and independent) and childminders.

Our Support Services for Education portal <a href="www.ss4eharrow.uk">www.ss4eharrow.uk</a> is the online public platform which allows registered service users to view, book and purchase training courses, resources and events for their staff and governors on behalf of their school, company or organisation, and access help, resources and news.

The ss4e website use SLA Online, a system hosted/managed by Frontline Data Limited and is managed by Harrow Council. Frontline Data host and process this site on behalf of Harrow Council. All information is kept in one domain. As processors we have ensured that the necessary data protection safeguards are in place, pursuant to the requirements of the Data Protection Act 2018 and General Data Protection Regulation.

Harrow Council is the Data Controller for this information and their legal basis for processing the data is performance of a task carried out in the public interest by the council.

## What do we use the information for?

Harrow Council collects your information on this site to enable you to browse and purchase training and services. Your contact details will be processed for the following purposes: Service Level Agreements (SLAs); training purchases; course reminders; pre-course information; communications, resources, provide links to online questionnaires and issue Continuing Professional Development (CPD) certificates.

# What personal information do we collect and hold/use about you?

The mandatory categories of information that we collect, process, hold and share so we are able to set up and operate a user account are:

- First Name and Last Name
- Email address
- Job title
- School/Company/Organisation name
- School /Company/Organisation telephone number

For childminders, we require the following additional personal information for account setup:

- personal telephone number
- home address

When you connect to the SS4e Website a cookie will be placed on your machine, Google Analytics and Session ID. You have the option to block these when you first open the website. For further information please see: <a href="http://www.ss4eharrow.uk/DataProtection/Cookies">http://www.ss4eharrow.uk/DataProtection/Cookies</a>

We do not require or request any sensitive information as part of the account setup, however there are additional non-mandatory fields within your user account which you may wish to update or add of your own choice. An example of this is Special Requirements, which if added will be relevant if you have a disability, accessibility or dietary needs to enable suitable arrangements to be made before and during the course or event/and or may affect any training course you are booked to attend.

# How you can access, update or delete your information

The system the council uses allows you to add edit or remove information held in the database. Your rights under GDPR can also be exercised by contacting: <a href="mailto:ss4e@harrow.gov.uk">ss4e@harrow.gov.uk</a> or 020 8736 6780.

#### Who we share information with?

Your personal details will be treated as strictly confidential, and are/will only be shared with our service administrators involved in providing services to registered users and their organisations. This is solely for the purpose of the service delivery, requested training and the effective operation of our SS4E portal.

Personal details will involve sharing your data/information with third party service providers. An example of this is whereby a third party training provider would be provided with a list of booked delegates in order to record attendance and issue achievement certificates.

You will be informed of when your data will be shared with third party training or service providers on individual course or service pages.

Business managers/CPD Lead administrators for individual schools/organisations are able to access their organisation's user accounts in order to ensure these remain up-to-date, and will update us when a member of staff leaves so that their account can be deactivated.

Your information is also shared with Frontline Data Ltd who are providing/delivering the website system/Portal and their managed hosting provider (KCOM Group PLC).

Frontline Data, act in accordance with the General Data Protection Regulation (GDPR) 2016/679, a regulation in EU law on data protection and privacy for all individuals within the European Union.

The SLA Online system is provided by Frontline Data Limited, incorporated and registered in England and Wales with company number 05427762 whose registered office is at Suite 19 North Colchester Business Centre, 340 The Crescent, Colchester, Essex, England, CO4 9AD.

Frontline Data Limited contract their managed server storage to KCOM Group PLC, a company registered in England and Wales with company number 2150618 whose registered office is 37 Carr Lane, Hull, East Yorkshire HU1 3RE.

If you would prefer us not to share your personal data, please let us know by email to <a href="mailto:ss4e@harrow.gov.uk">ss4e@harrow.gov.uk</a>. Please note that any such request may prohibit our ability to deliver our services to you.

# How we obtain your personal data?

We obtain the personal information from the following sources:

- self-entry Sign-up Form available on the Contacts' section of our Support Services for Education Services Harrow portal
- user profile information provided by the user's school or organisation using our User Verification Form
- User Profile information provided by the user's school or organisation using the User Management function available on our education services portal
- Paper and electronic contact forms, including the General Enquiry Form completed at conferences, exhibitions and events

#### Where is the information stored?

Frontline Data Ltd are delivering the website system/Portal and their managed hosting provider (KCOM Group PLC). Your information is stored on a secure server hosted by KCOM Group PLC, a company registered in England and Wales under number 2150618. Their security arrangements are here: <a href="https://www.kcomplc.com/about-us/our-responsibility/standards-policies-and-codes/">https://www.kcomplc.com/about-us/our-responsibility/standards-policies-and-codes/</a>

#### **Data Retention & Security**

The council has conducted a full data protection impact assessment which sets out the security requirements, including the transfer of data between schools/setting/organisations. Information on the online setting is encrypted and secured.

Personal data for all live/active user login will not be retained for longer than necessary in connection to the purpose for which they have been collected.

Records of purchases are retained for 7 years following completion of service delivery. This is so that we can keep required auditable records.

We immediately deactivate user accounts that we are made aware of the user having left their school/setting/organisation. Where user accounts are inactive for 5 years or more, they will be deleted from the system. Unless we make contact or you notify us that you require us to maintain the account for a further period.

The Council has retention schedules in place to ensure that information is only held for as long as it is needed.

## What rights do you have/Knowing your rights?

You have the right to cancel your log-in for this site at any time by contacting us at: <a href="mailto:ss4e@harrow.gov.uk">ss4e@harrow.gov.uk</a>

Further information about how we process your information can be found on the Councils' privacy notices. This includes contact information for the Council's Data Protection Officer, details of your rights and how you can exercise them. This is available on the council website: <a href="https://www.harrow.gov.uk/privacy">https://www.harrow.gov.uk/privacy</a>

The Information Commissioner's Office (ICO) is the UK's independent body set up to uphold information rights.

If you would like to know more about your rights under the Data Protection law and what you should expect from us, visit the **ICO website**.

If your questions cannot be answered by our team or you are dissatisfied with the processing of your information, you can raise your concern with the council's Data Protection Officer, Darren Davies, <a href="mailto:DPO@harrow.gov.uk">DPO@harrow.gov.uk</a>

If you have further concerns regarding our privacy practices or about exercising your Data Protection rights, you may wish to contact the Information Commissioner's Officer:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Telephone: 0303 123 1113 Email: casework@ico.org.uk

## Concerns or complaints/Where can I find out more?

Any questions regarding this policy and our practices should be sent to <a href="mailto:ss4e@harrow.gov.uk">ss4e@harrow.gov.uk</a>. Alternatively you can contact us on 0208 736 6780

For Local Authority complaints, in the first instance please raise complaints in writing to the Head of Service:

HSSE/Early Years Manager - Complaints Harrow Council Civic Centre Station Road Harrow HA1 2XY

Email: ss4e@harrow.gov.uk

The query will be logged and a representative will be in contact within 5 working days of complaint receipt. The matter will be investigated in a sensitive and timely way ensuring that concerns and issues are dealt with in a confidential and professional manner.

The Local Authority has in place a formal complaints procedure for any schools/settings/organisations who are not satisfied with the service they are receiving. Complaints can be submitted through completing the following online complaints form.

Alternatively please write to:

Corporate Complaints Officer London Borough of Harrow Civic Centre Harrow HA1 2XF

Harrow Corporate Complaints Policy Guidance Document

If a school/setting/organisation is not satisfied with the way in which their complaint has been dealt with by the Local Authority or believes the Local Authority has acted unreasonably, they can make a complaint to the <u>Local Government Ombudsman</u>. Such complaints will only be considered when the local complaints procedures have been exhausted.