

Stokehill Data Protection Notice (Privacy Policy)



Who We Are

Stokehill is a Data Controller for the purposes of Data Protection Law which means it determines how an individual's personal data is processed and for what purposes.

What This Policy Is For

This policy is intended to provide information about how Stokehill processes personal data about individuals

This information is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used.

This Privacy Notice applies alongside any other information the Stokehill may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Notice also applies in addition to Stokehill's other relevant terms and conditions and policies, including, but not limited to:

- any contract between the Stokehill and other organisations;
- Stokehill's policy on taking, storing and using images of school students and adult participants;
- Stokehill's safeguarding policy
- Stokehill's Health and Safety policy, including how concerns or incidents are recorded;
- Anyone who works for, or acts on behalf of, Stokehill (including, volunteers,) should also be aware of and comply with this Privacy Notice and the Data Protection policy, which also provides further information about how personal data about those individuals will be used.

Responsibility For Data Protection

The Director will deal with all requests and enquiries concerning Stokehill's uses of individuals personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law. Requests and enquiries should be sent to debbiehicks@stokehill.com

Why Stokehill Needs To Process Personal Data

In order to carry out its ordinary duties to its personnel and participants, Stokehill may process a wide range of personal data about individuals as part of its daily operation. Some of this activity Stokehill will need to carry out in order to fulfil its legal rights, duties or obligations.

Other uses of personal data will be made in accordance with Stokehill's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

Stokehill expects that the following uses may fall within that category of its (or its community's) "legitimate interests":

- To confirm the identity of prospective participants;
- To provide education and wellbeing services, and to monitor progress and educational needs;
- To enable relevant authorities to monitor and evaluate Stokehill's performance and to intervene or assist with incidents as appropriate;
- To safeguard participants' welfare and provide appropriate care;
- To fulfil contractual and legal obligations

To make use of photographic images of participants on the Stokehill and Leaf Education websites and (where appropriate) on their social media channels.

Where otherwise reasonably necessary for Stokehill's purposes, including to obtain appropriate professional advice and insurance.

In addition, Stokehill may need to process special category personal data (concerning health) in accordance with rights or duties imposed on it by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons may include:

To safeguard participants' welfare and provide appropriate pastoral care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so: for example for medical advice, social services, insurance purposes;

In connection with employment of its personnel, for example DBS checks
As part of any external complaints, disciplinary or investigation process that involves such data, for example if there are health or safeguarding elements; or
For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

Types Of Personal Data Processed By Stokehill

This may include, by way of example, but not limited to:

- names, addresses, telephone numbers, email addresses and other contact details;
- where appropriate, information about individuals' health, and contact details for their next of kin;
- images of participants (and occasionally other individuals) engaging in Stokehill's activities,

How Stokehill Collects Data

Generally, Stokehill receives personal data from the individual directly (including, in the case of pupils, from their teachers). This may be via a form, or simply in the ordinary course of interaction or communication (such as email).

However in some cases personal data may be supplied by third parties (for example a School, or other professionals or authorities working with that individual);

Who Has Access To Personal Data And Who Stokehill Shares It With

Occasionally, Stokehill will need to share personal information relating to its community with third parties, such as relevant organisations or authorities (HMRC, SS&L, or the local authority).

For the most part, personal data collected by Stokehill will remain within Stokehill, and will be processed by appropriate individuals only in accordance with access protocols. Particularly strict rules of access apply in the context of medical information held and accessed only by the Director, or otherwise in accordance with express consent.

Stokehill is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This may include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as Social Services or police. For further information about this, please view the Safeguarding Policy.

How Long We Keep Personal Data

Stokehill will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason.

Data on course and workshop enrolment forms will be kept for less than one year.

However, incident reports will need to be kept much longer, in accordance with specific legal requirements. Material will only be kept, if required to do so in law.

All email correspondence is retained for up to 3 years, after which time it is removed from live and archive email systems, along with any personal data contained within.

Your Rights

Individuals have various rights under Data Protection Law to access and understand personal data about them held by Stokehill, and in some cases ask for it to be erased or amended or for Stokehill to stop processing it, but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, should put their request in writing to the Director at debbiehicks@stokehill.com

Stokehill will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits, which is one month in the case of requests for access to information.

Individuals should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege.

An individual has the right to request that any inaccurate or out-of-date information about them is erased or corrected (subject to certain exemptions and limitations under the Act): please see above.

Stokehill will take appropriate technical and organisational steps to ensure the security of personal data about individuals

Queries And Complaints

Any comments or queries on this policy should be directed to the Director at debbiehicks@stokehill.com

If an individual believes that Stokehill has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the complaints procedure.