

Privacy Notice

aka Fair Processing Notice

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1. Contact information

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Email: reception@blackburnehouse.co.uk
Website: www.blackburnehouse.co.uk

Data Protection Team contact details

Name: Jennifer Lawson (Data Protection Lead)
Email: dataprotectionteam@blackburnehouse.co.uk

The organisation is registered as a data controller through the Information Commissioners Office.

Blackburne House Limited (BH) registration reference is Z8432647.

Women's Technology Training Limited (BHE) registration reference is Z5439958.

2. Introduction

Blackburne House Group (BHG) consists of two entities, Women's Technology Training t/a Blackburne House Education (BHE) and Blackburne House (BH)

Blackburne House Education (BHE) is the entity that looks after Education and Training.

Blackburne House (BH) is the entity that looks after of all the social enterprise business areas, Cafe Bar/Bistro, Conference & Events, The Health Place and Nursery.

3. Scope

This privacy and cookie notice sets out how Blackburne House Group (BHG) uses and protects any information that you give BHG when you use the website, social enterprise business areas and when you enrol as a student. BHG is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, you can be assured that it will only be used in accordance with this privacy notice. BHG may update this notice from time to time. If you have opted in to receive any of our marketing and communication emails, you will receive an email notification about any updates to this notice to ensure that you are happy with any changes.

4. How we use your personal information

4.1 Purpose

Social Enterprise Business areas (BH)

We collect and hold personal information relating to you from enquiries and bookings made through our social enterprise business areas, Cafe Bar/Bistro, Conference & Events, The Health Place and Nursery.

We use this personal data to:

- Contact you regarding your booking/enquiry
- Send out material relating to your booking/enquiry
- Send out marketing material relating to other business areas within the organisation

We will request your consent to use your information in this way at the time of enquiry/booking either by requesting you tick the consent box on the relevant form or by email.

We comply with the Data Protection Act 2018 and all General Data Protection Regulations (GDPR) and all subsequent UK legislation relating to the protection of records, including removing your personal information from our systems when it is no longer required and ensuring that all personal information supplied is held securely.

Education and Training area (BHE)

We collect and hold personal information relating to you during our enrolment process and may also receive information about you from your previous school, local authority and/or the Department for Education (DfE).

We use this personal data to:

- support your learning
- monitor and report on your progress
- provide appropriate pastoral care;
- assess the quality of our services; and
- validate claims for funding to provide our services

We collect the data to meet statutory obligations, to help protect the vital interests of our students and to perform contractual obligations for teaching purposes.

We will request your consent at the time of enrolment by requesting you tick the consent box on the enrolment form.

We comply with the Data Protection Act 2018 and all General Data Protection Regulations (GDPR) and all subsequent UK legislation relating to the protection of records, including removing your personal information from our systems when it is no longer required and ensuring that all personal information supplied is held securely.

4.2 What information do we collect?

Social Enterprise Business areas (BH)

This information will include your personal details – name, date of birth, address, telephone number, personal email etc. This information is required when you are making a booking/enquiry and becoming a client of BH.

We may also collect special category personal data such as your ethnic group, any special requirement needs you have as well as relevant medical information which may require additional resources. In all cases we will ask your consent to record this information in accordance with Article 9(a).

Any sensitive personal information we collect from you will never be supplied to anyone outside BH without first obtaining your consent, unless required or permitted by law.

Education and Training area (BHE)

This information will include your personal details – name, date of birth, address, telephone number, personal email etc. This information is required to undertake a course of study at BHE.

We also collect special category personal data such as your ethnic group, any special educational needs you have as well as relevant medical information which may require additional resources. In all cases we will ask your consent to record this information in accordance with Article 9(a).

Any sensitive personal information we collect from you will never be supplied to anyone outside BHE without first obtaining your consent, unless required or permitted by law.

For learners enrolling for post 14 qualifications, we match your records to the Learning Records Service to obtain your unique learner number (ULN) which may also give us details about your learning or qualifications.

4.3 Who collects the information?

Social Enterprise Business areas (BH)

Information is collected by staff at BH who have had specific training in data handling and are aware of the requirements to treat personal data in a private and secure manner.

Education and Training area (BHE)

Information is collected by staff at BHE who have had specific training in data handling and are aware of the requirements to treat personal data in a private and secure manner.

4.4 How is the information collected?

Social Enterprise Business areas (BH)

The information is collected upon your first enquiry with regards to one of our social enterprise business areas. This will be done in person, via telephone, via email or via our website.

Education and Training area (BHE)

The information is collected primarily during our enrolment process via a paper or online enrolment form. We may also collect data from the Learning Records Service relating to personal learning records for individuals over the age of 13.

4.5 Why do we collect the information?

Social Enterprise Business areas (BH)

We collect the information in order to keep in contact with you during your enquiry/booking but also so we can deliver the best possible service.

Education and Training area (BHE)

We collect the information for academic purposes only to register students participation in a course of study and provide a valid certificate of achievement on their completion and to ensure that we can provide the additional support needed to complete your studies. We also use it so we can communicate effectively with you during your period of learning with BHE.

4.6 How do we share your information?

Social Enterprise Business areas (BH)

We only share your information internally with our other business areas. This helps us to give you the best service possible by informing you of other opportunities we can offer you.

Education and Training area (BHE)

Young people aged 16 and over can decide for themselves and give consent for the processing of their personal information. Parental consent is not required. There may

be exceptions with regards to students with severe learning difficulties, school link students and those who are otherwise unable to decide for themselves.

BHE has found that it is very beneficial to you as a young student if we are able to engage with your parent/s (or guardian/carer). Therefore, it is very important that we have these details recorded on our systems.

We can only release information about you if we have your consent for this recorded on BHE systems. We ask for this consent on the enrolment form. Students can also inform us at any later time who we may discuss progress and other BHE related matters with. Students may withdraw their consent the same way which they gave it.

4.7 How do we store your information?

Social Enterprise Business areas (BH)

BH stores information about our clients manually in secure filing cabinets and on BH's computer network and on web based services. Access to computerised data is restricted to the relevant members of staff and is password protected.

Education and Training area (BHE)

BHE stores information about students manually in secure filing cabinets and on BHE's computer network and on web based services. Access to computerised data is restricted to you, your parents (where we have your consent) and appropriate staff, and is password protected.

4.8 How will it be used?

Social Enterprise Business areas (BH)

The information is accessed only to support your booking/enquiry. For this purpose, we may use personal data to contact you, the client, to inform you of new marketing and event opportunities. We may also use the data to highlight other areas of the organisation that may be beneficial to you and your organisation.

Education and Training area (BHE)

Information is accessed and collected to support your learning but also to track your destination and progression once your course has finished.

- Support your learning - we may use personal data to contact students to inform them of new learning opportunities, specific events, open evenings, offers and enrichment opportunities. We may also use the data to offer course enhancements that improve learning and employability.
- Tracking destination and progression - up to date information on your progress after you finish your course is collected to allow us to track your

destination and progression. This allows us to report on the impact of our service and supports the design and improvement of future courses.

BHE does not use any automated systems for decision making in relation to your eligibility for a course of study.

4.9 Who will your data be shared with?

Social Enterprise Business areas (BH)

We will not give information about you to anyone without your consent unless the law and our policies allow us to do so.

Education and Training area (BHE)

The law requires us to pass on certain information about you to the local authority who have responsibilities in relation to the education or training of students over 19 years of age. We may also share certain personal data relating to students aged 16 and over with post-16 education and training providers in order to secure appropriate services for them.

We will not give information about you to anyone without your consent unless the law and our policies allow us to do so.

BHE is also required to provide student data to the Education and Skills Funding Agency (ESFA) who is an executive agency of the Department for Education (DfE) and the Liverpool City Region Combined Authority (LCRCA) who are in control of the devolved AEB funding via the DfE. The DfE may also share student level personal data that we supply to them, with third parties. This will only take place where legislation allows it to do so and it is in compliance with the GDPR.

For more information on how the ESFA use your data please refer to the following privacy notice - [ESFA Privacy Notice](#)

For more information on how the LCRCA use your data please refer to the following privacy notice - [LCRCA Privacy Notice](#)

We do not share or transfer your data with any other country.

We also share your information with other organisations that provide services to enhance your learning experience, in such instances BHE will have a data sharing agreement that protects the third parties use of your data.

4.10 What will be the effect of this data sharing on you?

Social Enterprise Business areas (BH)

This is not applicable. See 4.9.

Education and Training area (BHE)

There should be no effect on students other than to improve their learning experience, however, BHE recognises the sensitivity of releasing information to third parties.

Decisions on whether DfE releases this personal data to third parties are subject to a robust approval process and are based on a detailed assessment of who is requesting the data, the purpose for which it is required, the level and sensitivity of data requested and the arrangements in place to store and handle the data. To be granted access to pupil level data, requestors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention and use of the data.

For more information on how this sharing process works, please visit: <https://www.gov.uk/guidance/national-pupil-database-apply-for-a-data-extract>

For information on which third party organisations (and for which project) learner level data has been provided to, please visit: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

4.11 Will sharing the data in this way cause you to object or complain?

Social Enterprise Business areas (BH)

This is not applicable. See 4.9.

Education and Training area (BHE)

We pass information on only for the benefit of your learning, we do not pass on information to third parties for the marketing of goods or other paid for services.

5. Cookies

5.1 How we use cookies

Although cookies can't provide BHG with personal information about you, i.e. your name, email, address, etc, they do provide us with information about how our website is being used. They inform us on the following:

- How many visitors we've had to our site
- How people interact with the site, i.e. what pages you visit
- Whether you've been a previous visitor to the website
- What country you are accessing our site from
- How long you spend on each page

Cookies only collect data about how your browser is used on your device. No personal information is collected or provided.

We use the information provided by the cookies to help provide a service that is useful, reliable and easy. We use it to help us improve our website and the services it offers to our visitors.

5.2 Third party cookies

We use a number of third party platforms which also collect cookies. Below is a list of those platforms and the links to their privacy and cookies policies.

Provider platform	Purpose	More information
Google Analytics	These cookies are used to collect information about how visitors use our site. We use the information to help us improve our site. No personal data is collected.	Google Privacy Policy Google Analytics Opt-out
Facebook	To market advertising to our website, upcoming events, and education opportunities	Facebook Data Policy Facebook Cookies Policy
Twitter	To market advertising to our website, upcoming events, and education opportunities	Twitter Privacy Policy Twitter Cookies Policy
Instagram	To market advertising to our website, upcoming events, and education opportunities	Instagram Privacy Policy Instagram Cookies Policy
LinkedIn	To market advertising to our website, upcoming events, and education opportunities	LinkedIn Privacy Policy LinkedIn Cookies Policy
Eventbrite	To sell tickets for our events	Eventbrite Privacy Policy Eventbrite Cookies Statement

MailChimp	To send marketing from all business areas	MailChimp Privacy Policy MailChimp Cookies Statement
YouTube	Share videos from all business areas	YouTube Privacy Policy
Zoom	To deliver online courses and to hold meetings between other social enterprise organisations	Zoom Privacy Policy Zoom Cookies Policy
Microsoft Teams	To deliver online courses and to hold meetings between colleagues offsite and other social enterprise organisations	Microsoft Teams Privacy Microsoft Privacy Statement

6. Consent

6.1 Handling personal information based on consent

Some personal information we collect will be done so exclusively based on consent. Processes we need consent for are:

- Marketing
- Newsletters
- Cookies

It is understood when giving consent for these processes that it can be withdrawn or amended at any time. This can be done via the method in which you gave consent initially or by contacting the data protection team at dataprotectionteam@blackburnehouse.co.uk

7. Group information (BHG)

7.1 Document Retention

7.1.1 How long do we keep your records?

The retention period of all the information and documentation we process is subject to the different classifications of data. All retention periods for each of these classifications can be found in our Record of Processing Activities (RoPA) (pending release following consultation).

7.2 Your Rights

7.2.1 What are your rights in relation to the information that we hold?

You have significant legal rights in respect of the data that we process in relation to your engagement with BHG, and the key points are detailed below:

- Subject Access Request (SAR) – you may request copies of all the information BHG stores relating to you including details relating to the rights of data subjects.
- In accordance with the regulations we do not charge a fee for SAR requests, however, a fee may apply under certain circumstances. We will provide the data requested within the regulated timeframe of one calendar month from the date of the request. If we deem the request to be complex or we have received a number of requests from you we may extend this timeframe by a further two months. We will inform you of the reasons for the extension before the initial one calendar month has passed.
- Right to correct data – you may ask for data held by BHG to be corrected where applicable.
- Right to erasure (the right to be forgotten) – you may request for BHG to delete all information relating to you where the data is no longer needed for its original purpose.
- Right to restrict processing – you may request that the information we store is strictly limited in use to the sole purpose of continuing or completing their course of study. In this circumstance we will not pass on any information to third parties other than the statutory bodies described in this document.
- Right to data portability – you may ask to receive a copy of all information held by BHG in a common format to allow transfer to another organisation.
- Right to object – you may object to our use of their data on certain grounds.
- Right to complain – you have the right to complain if BHG has used your data in a manner that has infringed your rights. This can be directly to BHG in which case we will do all we can to satisfy the complaint, alternatively a complaint can be made directly to the Information Commissioners Office.

To exercise any of these rights please contact the Data Protection Team in writing using the email address at the beginning of this document.

To raise a concern with the Information Commissioners Office please access the following web page - <https://ico.org.uk/concerns>

7.3 Our legal rights and responsibilities

7.3.1 Our legal right to process your data

The information we collect is necessary when providing a service through our social enterprise business areas, for your enrolment and participation as a student, or is required by law. You must provide it in order to access the services and to enrol at BHG.

We use your data for specific purposes, for a list of the processes involved and our legal right to process your data please contact the Data Protection Team for a copy of the Record of Processing Activities (RoPA) (pending release following consultation)

7.3.2 Our responsibilities

BHG as a corporate body is the data controller under the GDPR, and the Board of Governors is therefore ultimately responsible for implementation.

The Data Protection Team has been appointed to ensure compliance with the Data Protection Act 2018 and GDPR legislation by advising, guiding and challenging the organisation on all its processing activities. They are also responsible for the training of staff so that they are fully aware of how they should handle and protect personal information within the organisation.