



## PRIVACY POLICY

### About this policy

This policy describes how we use your personal data when you use our websites or when we provide services to you. We have provided this policy to ensure that you understand what personal data we may collect and hold about you, what we may use it for and how we keep it safe. You have legal rights to access the personal data that we hold about you and to control how we use it, which are also explained.

### Who we are and how you can contact us

We are Achieving for Children (AfC), a Community Interest Company with company number 08878185. Registered address: Gifford House, 67c St Helier Avenue, Morden, SM4 6HY. You can contact us in writing at the above address or by emailing [andrew.thorne@achievingforchildren.org.uk](mailto:andrew.thorne@achievingforchildren.org.uk). If you would like to speak to us call us on 0208 891 7790

### Contact

If you would like to discuss anything in this privacy notice, please contact our Data Protection Officer: [dpo@achievingforchildren.org.uk](mailto:dpo@achievingforchildren.org.uk)

### What personal data we collect about you

We collect:

- Personal data that you provide to us. The personal data that you provide to us may include your name, address, e-mail address and phone number, financial and credit card information. In connection with an application for work with us, we will collect, store and use the following information; age/date of birth, sex/gender, marital status, education details, employment history, emergency contacts, referee details, immigration status (whether you need a work permit), nationality/citizenship/place of birth, copies of photographic ID documents (driving licence, passport, identity card), social security number (or equivalent) and tax-related information, diversity information (including racial or ethnic origin, religious or other beliefs, physical or mental health, details of any disabilities), details of any criminal convictions (if required by the role for which you apply), information related to your interests and needs regarding future employment and additional information that you choose to tell us, whether in a curriculum vitae and accompanying correspondence, or in any form you complete.
- Personal data that we receive from third parties. If we work with other businesses or use sub-contractors these parties may collect personal data about you which they will share with us. These will include organisations for whom you have provided services on an agency or other basis after we have put you in touch with such organisations. For example, we may obtain your name and contact details from job boards that refer you to us so that we can provide you with our services or receive feedback from a sub-contractor for whom you have worked on an agency basis.



- We may also collect personal data from recruitment agencies, background check providers, the Disclosure and Barring Service in respect of criminal convictions (unless we are lawfully allowed to use the service), and your named referees.
- Personal data about your use of our website. This is technical information and includes details such as your IP address, your login information, browser type and version, time zone setting and browser plug-in types and versions, operating system and platform, as well as details of how you navigated to our website and what pages or services you viewed or searched for, page response times, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and any phone number used to call our customer service number.

### **What we use your personal data for**

We use your personal data in the following ways:

**personal data that you provide** to us is used to:

- provide you with the information, products and services that you request from us;
- manage and administer our business;
- review and improve our service; and
- assess your skills, qualifications and suitability for the work, to carry out background checks, to communicate with you about the recruitment process, to keep records relating to our hiring process and to comply with legal or regulatory requirements.

**personal data that we receive from third parties** is combined with the personal data that you provide to us and used for the purposes described above.

### **Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our website. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

### **When we need your consent to use your personal data**

Whilst we always want you to be aware of how we are using your personal data, this does not necessarily mean that we are required to ask for your consent before we can use it. In the day to day running of our business we may use your personal data without asking for your consent because:

We are entering into and carrying out our obligations under a contract with you; and we need to use your personal data for our own legitimate purposes (such as the administration and management of our business or for the improvement of our services or deciding whether to enter into a contract of employment with you) and our doing so will not interfere with your privacy rights.



### **Exemptions to consent**

In exceptional circumstances we may wish to use your personal data for a different purpose which does require your consent. In these circumstances we will contact you to explain how we wish to use your data and to ask for your consent. You are not required to give consent just because we ask for it. If you do give consent you can change your mind and withdraw it later.

Under the General Data Protection Regulation (GDPR), the legal basis / bases we rely on for processing personal information for general purposes are The General Data Protection Regulation conditions **Article 6, paragraph 1:**

- Section a: the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- Section c: processing is necessary for compliance with a legal obligation to which the controller is subject;
- Section d: processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- Section e: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- Section f: processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Also for the purposes of delivering children's services in accordance with The Children Act 1989 concerning the special category data

- The General Data Protection Regulation conditions - Article 9, paragraph 2, section h: "processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;"

### **Personal data you are legally obliged to provide**

You are not under a legal obligation to provide us with any of your personal data but please note that if you elect not to provide us with your personal data we may be unable to provide our services to you or to process your application successfully.

### **Your rights to know what personal data we hold and to control how we use it**

You have a legal right to know what personal data we hold about you - this is called the right of subject access. You can exercise this right by sending us a written request at any time or through email to [foi.sar@achievingforchildren.org.uk](mailto:foi.sar@achievingforchildren.org.uk). Please mark your letter "Subject Access Request".

You also have rights to:

- prevent your personal data being used for marketing purposes
- have inaccurate personal data corrected, blocked or erased;



- object to decisions being made about you by automated means or to your personal data being used for profiling purposes;
- object to our using your personal data in ways that are likely to cause you damage or distress;
- in certain circumstances you may have the right to restrict our use of your personal data;
- require that we delete your personal data; and
- require that we provide you, or anyone that you nominate, with a copy of any personal data you have given us in a structured electronic form such as a CSV file.

You can find full details of your personal data rights on the Information Commissioner's Office website at [www.ico.org.uk](http://www.ico.org.uk).

### **When we will share your personal data with others**

We share your data with the following people in the day-to-day running our business:

- other parts of AfC;
- any business partners, suppliers and sub-contractors we work with to provide you with goods or services that you have requested from us;
- individuals and organisations who hold information related to your reference or application to work with us, such as current, past or prospective employers, educators and examining bodies and employment and recruitment agencies;
- tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation);
- third party service providers who perform functions on our behalf (including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
- third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place;
- individuals and organisations who hold information related to your reference or application to work with us, such as current, past or prospective employers and recruitment agencies;
- potential employers and other recruitment agencies and organisations to increase your chances of finding employment;
- third party partners, job boards and job aggregators where we consider this will improve your chances of finding employment;
- third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws;
- advertisers and advertising networks
- analytics and search engine providers that assist us in the improvement and optimisation of our site;

We may also share your personal information with third parties on a one-off basis, for example, if:

- we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our website terms of use or our terms and



conditions of supply and other agreements; or to protect the rights, property, or safety of our customers, ourselves or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### **How we keep your personal data safe**

We take every care to ensure that your personal data is kept secure. The security measures we take include:

- only storing your personal data on our secure servers and third-party systems that meet our security recommendations;
- ensuring that our staff receive regular data security awareness training;
- keeping paper records to a minimum and ensuring that those we do have are stored in locked filing cabinets on our office premises;
- maintaining up to date firewalls and anti-virus software to minimise the risk of unauthorised access to our systems;
- enforcing a strict policy on the use of mobile devices and out of office working;

Unfortunately, sending information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of personal data sent to our website; you send us personal data at your own risk. Once we have received your personal data, we will use strict procedures and security features (some of which are described above) to try to prevent unauthorised access.

### **How we use your personal data for marketing**

We never share your personal data with third parties for marketing purposes.

### **How long we keep your personal data**

We only keep your personal data for as long as we actually need it. In practice this means that we will keep:

- We will delete your personal data from our systems if we have not had any meaningful contact with you (or, where appropriate, the company you are working for or with) for two years (or for such longer period as we believe in good faith that the law or relevant regulators require us to preserve your data). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.
- When we refer to "meaningful contact", we mean, for example, communication between us (either verbal or written). We will consider it meaningful contact if you communicate with us about potential roles, either by verbal or written communication or click through from any of our marketing communications. Your receipt, opening or reading of an email or other digital message from us will not count as meaningful contact – this will only occur in cases where you click-through or reply directly.

Please note that we may anonymise your personal data or use it for statistical purposes. We keep anonymised and statistical data indefinitely, but we take care to ensure that such data can no longer identify or be connected to any individual.

**How you can make a complaint**

If you are unhappy with the way we have used your personal data, please contact our GDPR Owners [dpo@achievingforchildren.org.uk](mailto:dpo@achievingforchildren.org.uk) to discuss this using the contact details set out in the Who we are and how you can contact us section above.

You are also entitled to make a complaint to the Information Commissioner’s Office which you can do by visiting [www.ico.org.uk](http://www.ico.org.uk). Whilst you are not required to do so, we encourage you to contact us directly to discuss any concerns that you may have and to allow us an opportunity to address these before you contact the Information Commissioner’s Office.

**How we keep this policy up to date**

We will review and update this policy from time to time. This may be to reflect a change in the services we offer or to our internal procedures or it may be to reflect a change in the law.

The easiest way to check for updates is by looking for the latest version of this policy on our website ([www.achievingforchildren.org.uk](http://www.achievingforchildren.org.uk)) or you can contact to ask us to send you the latest version of our policy.

This is policy version 1 which came into effect on 25 May 2018.  
 It will be reviewed on 1<sup>st</sup> June 2019

	signature	date
Please sign if you consent to AfC contacting you via your email address		
Please sign if you consent to Achieving for Children holding your data in line with the policy above		