

Data Protection/GDPR Policy

September 2021

Key policy information

Chair of Trustees Contact Details	Patrick Ward patrick.ward@lewisham.gov.uk
Deputy Chair of Trustees Contact Details	Julie Bunn Julie Bunn Julie.Bunn@northyorks.gov.uk
Honorary Secretary Contact Details	Michelle Salter michelle.salter@telford.gov.uk
Policy ratified on	
Signed	
Policy to be reviewed on	Annually September 2022

Our Values

The National Association of Virtual School Heads exists to improve educational outcomes for all children with a Social Worker, Looked After Children and Previously Looked After Children. Supporting children underpins all of the work that we do and our organisation is committed to safeguarding.

Purpose

This privacy policy is issued by the NAVSH. Registered in England and Wales No. **1166708**. Registered address: C/o UHY Hacker Young (Birmingham) LLP, 9-11 Vittoria Street, Birmingham BN1 3ND

We are committed to protecting the privacy and the confidentiality of the personal information of visitors to our Website. We undertake to ensure that all personal information in our possession is processed in accordance with the principles of the Data Protection Act 1998.

This website's Privacy Policy explains how and for what purposes we use the information collected about you. We are committed to protecting the privacy and the confidentiality of the personal information of visitors to our website.

We undertake to ensure that all personal information in our possession is processed in accordance with the requirements of the European General Data Protection Regulation ('GDPR') and Data Protection Act ('DPA').

We may update this Policy from time to time.

Your Rights

We operate under GDPR and DPA. We ensure lawful processing of personal data by obtaining your consent; or where there is a contractual obligation to do so in providing appropriate products and services; or where processing the data is necessary for the purposes of our legitimate interests in providing appropriate products and services.

The DPA and GDPR apply to 'personal data' we process, and the data protection principles set out the main responsibilities we are responsible for.

We must ensure that personal data shall be:

1. processed lawfully, fairly and in a transparent manner.
2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
4. accurate and where necessary kept up to date.
5. kept for no longer than is necessary for the purposes for which the personal data are processed.

6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Under GDPR you have the following specific rights in respect of the personal data we process:

1. The right to be informed about how we use personal data.
2. This Privacy Policy explains who we are; the purposes for which we process personal data and our legitimate interests in so doing; the categories of data we process; third party disclosures; and details of any transfers of personal data outside the UK.
3. The right of access to the personal data we hold. In most cases this will be free of charge and will be provided within one month of receipt.
4. To obtain a copy of the personal information we hold on you, please write to us and provide us with your details or email: info@navsh.org.uk
5. The right to rectification where data is inaccurate or incomplete. In such cases we shall make any amendments or additions within one month of your request.
6. The right to erasure of personal data, but only in very specific circumstances, typically where the personal data is no longer necessary in relation to the purpose for which it was originally collected or processed; or, in certain cases where we have relied on consent to process the data, when that consent is withdrawn and there is no other legitimate reason for continuing to process that data; or when the individual objects to the processing and there is no overriding legitimate interest for continuing the processing.
7. The right to restrict processing, for example while we are reviewing the accuracy or completeness of data, or deciding on whether any request for erasure is valid. In such cases we shall continue to store the data, but will not further process it until such time as we have resolved the issue
8. The right to data portability which, subject to a number of qualifying conditions, allows individuals to obtain and reuse their personal data for their own purposes across different services.
9. The right to object in cases where processing is based on legitimate interests, where our requirement to process the data is overridden by the rights of the individual concerned; or for the purposes of direct marketing (including profiling); or for processing for purposes of scientific / historical research and statistics, unless this is necessary for the performance of a public interest task.
10. Rights in relation to automated decision making and profiling.
- 11.

Please contact our info@navsh.org.uk for more information about the GDPR and your rights under data protection law or if you have a complaint about data protection at the Attachment Research Community

Our supervisory authority for data protection compliance is the Information Commissioner (www.ico.org.uk):
Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Collection and Use of Information

1. We collect personal information (such as your name, contact details, job title etc.) that you supply to us. Your information is collected when you request information from us, contact us, make a booking with us, and purchase membership from us. We will update your information whenever we get the opportunity to keep it current, accurate and complete.
2. Any information you provide when booking with us and or purchasing membership will be used for the NAVSH purposes only in order to process that transaction. From time to time we may send you information from other organisations which we think may be of interest to you. We may also disclose your information to companies who act as “data processors” on our behalf. However we do not sell, rent or otherwise distribute any personal information to third parties.
3. You may indicate your preference for receiving direct marketing by telephone, post or by e-mail, from us or any partner organisations with whom we may work. You will be given the opportunity on every communication we send you to indicate that you no longer wish to receive our direct marketing material. You may, in addition, indicate your preference regarding receiving third party direct marketing material. Once properly notified by you, we will take steps to stop using your information in this way.
4. We only retain personal data for the purposes for which it was collected and for a reasonable period thereafter where there is a legitimate business need or legal obligation to do so.

Our use of cookies

By using our websites you are agreeing to the use of cookies as described. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

We use cookies for a number of reasons:

1. For statistical purposes to track how many individual unique users we have and how often they visit our websites. We collect data that lists which of our pages are most frequently visited and by which types of users and from which countries.
2. Our marketing emails may contain cookies to tell us whether our emails are opened and verify any clicks through to links within the email. We may use this information for determining which of our emails are more interesting to users in order to improve the content of our emails over time.
3. We use third parties to collect anonymous user information. These cookies are used to collect information about how visitors use our site. We use the

information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the page they visited.

4. Flash cookies may be used to store user preferences for media player functionality and without them some video content may not render correctly.
5. You can turn cookies off but please remember that if you do choose to disable cookies, you may find that certain sections of our website do not work properly. You will, however, still be able to view site content.
- 6.

For more information about cookies and managing them, including how to turn them off, please visit the www.allaboutcookies.org

Measuring Website Usage (Google analytics)

We use Google Analytics to collect information about how people use this site. We do this to make sure it's meeting its users' needs and to understand how we could do it better.

Google Analytics stores information about what pages you visit, how long you are on the site, how you got here and what you click on. They do not collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are. We do not allow Google to use or share our analytics data.

How we protect your information

We use up-to-date industry procedures to protect your personal information. We have appropriate security measures in place in to protect against the loss, misuse or alteration of information that we have collected from you via our websites. However please be aware that the internet is not a 100% secure medium of communication. The National Association of Virtual Heads (NAVSH) cannot therefore guarantee the security of any information you input on the website or send to us on the internet. The National Association of Virtual Heads (NAVSH) is not, and will not be, responsible for any damages you or others may suffer as a result of the loss of confidentiality of any such information.