

PRIVACY POLICY

Company Operations

ADO SERVICES C.I.C.

Incorporating ADO River Valley

Version 7.7 ©2023-2024

Last Ratification By Management Committee	March 2023
Next Review By Management Committee	March 2026
Latest Update by ADO River Valley	March 2023

2023-2024

1 Privacy Policy Overview

It is the policy of ADO, all its brands and services to comply fully with the requirements of Data Protection Act 1998 and the EU General Data Protection Regulation 2016/679. This means that we are responsible for, and control the processing of, the personal information you provide to us when accessing ADO River Valley in accordance with this privacy policy.

ADO understands that stakeholders care about the use and storage of their personal information and we value your trust in allowing us to do this in a careful and sensible manner. We have created this privacy policy statement in order to demonstrate our commitment to the privacy of our stakeholders.

By using ADO River Valley, our social media pages, our office administration function or any of our media information functions, you are acknowledging that we are processing your personal information and, where necessary consenting to such practices, as outlined in this statement.

2. Responsibilities and Storage

ADO never shares your personal information with non-partner third party organisations or individuals our services. We never sell data to third party organisations.

ADO shares personal information with partner organisations and London Borough's for ADO River Valley for the purpose of assessment and continuing development or outcome driven reasons for the children, young people (CYP) that have been referred. These partnerships are legally controlled by a service level agreement and in some cases are under a restriction of a non-disclosure agreement policy. The Boroughs take on the role of Data Controller and ADO are considered Data Processors. For school services there may be an instance whereby the roles of Data Controller and Data Processor are considered joint roles, especially if the service is initiated via a third-party school, private or independent school or by a parent-carer.

ADO has a responsibility to protect personal information. Data kept on our computer servers is protected by secure access to a limited number of trusted staff. Data is protected by regularly updated security software systems to avoid hacking, phishing or any other attempt to attack our systems from outside or our network. Our website data is stored off-site using a world class internet service provider. Internal security passwords are changed regularly and require strict combinations of lower case, upper case and symbols.

Confidential or sensitive information is shared through secure email systems between partners.

Personal data stored in hard paper copy format is stored in locked filing cabinets at our main office. Access to keys is restricted to authorised staff only. This secure information is

located within a secure room at our head office with a combination lock entrance limited to key staff.

3. Personal Information We Collect

We collect personal information about you in the following ways:

- Online Form: Bookings, registrations, new starter or other information requirements are made using our website for all our services, as follows;
 - Providing information on your child or young person (CYP) information and preferences as part of the standard new starter processes
 - Registering CYP for assessments
 - Enquiring about ADO River Valley through our 'Contact Us' form
 - Enquiring about a job opportunity

All calls, enquiries to our main office where information is required are always directed to complete the online forms for data protection purposes.

- Your request for more information about our services or to be included in our newsletter subscriber list

Our marketing methodology is always through our secure newsletter software package. We never send ad-hoc email messages.

- When you post material to our social media pages
- When you complete customer feedback or surveys forms as part of our internal quality assurance procedures
- If you raise a complaint or dispute with us or are involved in a legally recordable incident at our premises, in relation to information required on an Incident Form in line with Safeguarding or Health and Safety reporting or the primary complaint procedure of completing a Customer Feedback form.
- When you participate in competitions or promotions
- If you use our website and future online forms in any other way
- Credit card or debit card payments made over the phone. These details once input into the card reader are immediately shredded and are not kept. In addition ADO are PCI DSS compliant.
- ADO River Valley information is currently stored on a secure hard drive with access only to authorised staff. Paper copies are stored in lockable filing cabinets in a locked 'safe' room, only accessible by authorised staff. Any email messages once stored are deleted.
- Non secure emails only refer to CYP by their initials, never the full first or surnames.

4. Types of Personal Information

Depending on the form or the method, we may record the following types of information:

- Full Name
- Postal Address
- Email Address
- Telephone Number – Home & Mobile
- Emergency Contact Details – Name and Telephone Number
- Geo Location
- IP Address
- Payment Preferences
- Disability or Special Educational Needs
- Learning Difficulties
- Health Status
- Any Medical Requirements or Allergies
- Your Children’s Preferences or Important Information
- Dietary, Other Preferences or Special Requirements
- Your Cookies or Tracking Information
- Information held on voice recordings left on our telephone system
- Identification Information

In addition, for ADO River Valley, our partner organisation will provide full reports for each CYP which may include, but not limited to, a full history of their education, special educational needs, discipline record, medical records and family records. These reports are sent to us via secure email at which point are then transferred to our own secure environment.

5. How We Use Your Information

At ADO the information you provide is used to provide the service you have requested.

- Bookings and Registrations – A form that provides communication for you on the service and when you want to access it.
- Your Information Updates – Ensures we always have the most up to date information to contact you and provide you with ADO River Valley
- Our Information Updates – Ensures we can communicate important changes in policy, procedures, and prices to you
- Marketing - To keep you up to date with our latest information
- To comply with governing bodies, for example Ofsted, London Borough’s, Legal Services
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Those categories covered in any data subject are as follows:

- Staff
- Sub-Contractors
- Volunteers
- Customers
- Clients
- London Boroughs
- Partnership Organisations
- Suppliers
- Students
- Website Users

6 Marketing and Promotional

ADO will only communicate with you for marketing purposes to let you know about our own products and services. We never share, sell or distribute your personal information to third parties. ADO may use your personal information to ensure we only offer the services that may be relevant to you. They may be a part of a programme you are already attending or, they may be an extension to ADO River Valley services. They may be important updates or changes to ADO River Valley. They may be changes to your terms and conditions as part of our version control, change and release management procedures.

7 Retention of Data

The retention of data varies depending on its origin of purpose, but as a guide the following deadlines are followed before being permanently deleted:

- Debit card or credit card details over the phone – Immediately upon actioned or 24 hours if processed later. Details kept in a lock box until actioned
- Recorded Voicemail – 7 days from the received call
- Marketing Data – 3 years from the point of last contact
- Registration Details – 3 years after last registration

8 Security of Data

Data is held on our secure network attached storage units. Password protection is stringent across all our platforms and conforms to certain standards. All hard and paper copies of confidential information are stored in a padlocked cabinet within a secure room with coded entry only to certain authorised members of staff.

For further information on the security of data please see the **ADO Information Security** policy which covers this subject comprehensively.

8 Non-Disclosure

All staff, whether full-time, part-time, sessional, self-employed or volunteers are subject to signing and agreeing to our non-disclosure confidentiality agreement policy (NDA).

9 Your Rights

At any point in time, you can contact ADO to request details concerning the information we hold about you, why we have that information, who has access to the information and where we got the information. In most cases you may be entitled to copies of the information we hold concerning you. Once we have received your request, we will respond within 30 days.

9.1 The Right To Correct and Update Information We Hold About You

If the data we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated. In fact, we openly encourage you to contact us to update information as soon as possible.

9.2 The Right To Have Your Information Deleted

If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request, we will confirm whether the data has been deleted or tell you the reason why it cannot be deleted. This may be because you are contractually restricted for example.

9.3 The Right To Object To Processing of Your Data

You have the right to request that ADO stops processing your data. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your data to comply with your other rights.

9.4 The Right to Ask Us To Stop Contacting You With Direct Marketing

You have the right to request that we stop contacting you with marketing newsletters. Each newsletter has the opportunity to unsubscribe. You can unsubscribe any time by following a link back to your preferences.

Please note it is not possible to 'opt-out' of receiving communication from us which relates to ADO River Valley.

9.5 The Right To Data Portability

You have the right to request that we transfer your data to another controller. Once we have received your request, we will comply where it is feasible to do so.

10. Review

All ADO policies and procedures follow ITIL guidelines to ensure version control, change control and release management of any documents. As a matter of policy, documents can be updated at any time to reflect changes to ADO procedures, legal changes, OFSTED directives or any other reason to ensure the policies and procedures are accurate and correct. This involves consultation with stakeholders and approval from the directors. All policies and procedures are reviewed at the very least on an annual basis. Regular communication through newsletters, social media, text systems and through our website within the ADO Library is part of our Release Management.

11 Data Controller

The ADO Business Operations and Support Executive has been selected as the Data Controller.

For any information required or any other queries, all correspondence should be directed at the Data Controller

As a process of escalation, you can make a complaint to us by contacting us using the contact at gmp@adoservices.co.uk. If this does not resolve your complaint you can contact the data protection supervisory authority – in the UK, this is the Information Commissioner's Office, at <https://ico.org.uk/>.

ADO Services
ADO River Valley School
126 Upper Wickham Lane
Welling
Kent
DA163DP

Our ICO Reference Number: A8381648

13. References

Internal ADO References include:

Information Security Policy
Photographic-Imagery and Media Policy
Mobile Phone & Smart device Policy

All these documents can be found in the ADO Library at:

[Policies and Procedures \(adorivervalley.co.uk\)](http://adorivervalley.co.uk)

Useful External References include:

The Information Commissioners Office - <https://ico.org.uk/>

The Government Guide to the General Data Protection Regulations - <https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation>

14. Contact

This document was produced by the ADO Operations Consultancy Team. This version supersedes any previous versions and will be reviewed annually.

All correspondence with regard to this policy, or any other operational policy and procedure should be directed to the ADO Business Operations and Support Executive by e-mailing gmp@adoservices.co.uk or calling 0208 855 6778, requesting to speak to Gary McHolland-Pilcher or in writing, ADO Services CIC, Head Office, 126 Upper Wickham Lane, Welling, Kent, DA16 3DP.