

PRIVACY POLICY

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Version	2
Applicable To	Members of Horizon Community Training (learners, staff (including volunteers) partners and visitors)
Document Owner	Kath Shanahan
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Availability	Policies and Procedures Folder, SharePoint, Company Website

Introduction

This Privacy Policy describes how the personally identifiable information which is provided to Horizon Community Training (Horizon) is collected, protected and used.

It also describes the choices available regarding Horizon's use of an individual's Personal Information and how individuals can access and update this information. This Policy is a legally binding agreement between an individual and Horizon.

By accessing and using our services and our website, individuals acknowledge that they have read, understood and agree to be bound by the terms of this Policy. This Policy does not apply to the practices of companies that we do not own or control, or to individuals that we do not employ or manage. For further details in terms of the collection, storage, protection and usage of personal data refer to Horizon's GDPR Policy and Procedure.

Collection of personal information

Individuals can access and use our services and our website without telling us who they are or revealing any information by which someone could identify them as a specific, identifiable individual. If, however, they wish to use some of the features on the website and use our services they may be asked to provide certain Personal Information (for example, their name and email address). We receive and store any information that is knowingly provide to us when individuals complete any forms on the website and services. When required, this information may include the following:

- Personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- Characteristics (such as ethnicity, language)
- Safeguarding information (such as court orders and professional involvement)

- Special educational needs (copies of Educational Health Care Plans (EHCP) including the needs and ranking)
- Medical and administration (such as doctor's information, learner health, dental health, allergies, medication and dietary requirements)
- Attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- Assessment and attainment (such as exam results and enrolment information)
- Behavioural information (such as exclusions and any relevant alternative provision put in place)
- Any other materials an individual willingly submits to Horizon (such as articles, images, feedback, etc)

Individuals can choose not to provide Horizon with their Personal Information, but then they may not be able to take advantage of some of the features of our service/on our website. Users who are uncertain about what information is mandatory are welcome to contact us.

Use and processing of collected information

In order to make the services and website available to individuals and to meet legal obligations, we need to collect and use certain Personal Information. If individuals do not provide the information that we request, we may not be able to provide them with the requested products or services. Some of the information we collect is directly from individuals via the services and website. However, we may also collect Personal Information about individuals from other sources such as previous school/colleges attended/Local Authorities. Any of the information we collect may be used for the following purposes:

- To support service users to learn and develop
- Protect from abuse and harm, support safeguarding/keeping users safe
- Create and manage user accounts
- Send administrative information
- Respond to inquiries and offer support
- Request user feedback
- Improve/assess user experience/quality of service
- Respond to legal requests/statutory duties
- Run and operate the services and website

Processing an individual's Personal Information depends on how they interact with the services and website, where they are located and if one of the below applies:

- They have given their consent for one or more specific purposes; this, however, does not apply whenever the processing of Personal Information is subject to European data protection law

- Provision of information is necessary for the performance of an agreement with an individual and/or for any pre-contractual obligations
- Processing is necessary for compliance with a legal obligation to which an individual is subject
- Processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in Horizon
- Processing is necessary for the purposes of the legitimate interests pursued by Horizon or by a third party

Disclosure of information

Depending on the requested services or as necessary to complete any transaction or provide any service an individual has requested, Horizon may share an individual's information with their consent with our trusted third parties that work with us, any other affiliates and subsidiaries we rely upon to assist in the operation of the services and website available. These service providers are not authorised to use or disclose an individual's information except as necessary to perform services on Horizon's behalf or comply with legal requirements. These third parties are given Personal Information they need only in order to perform their designated functions, and Horizon do not authorise them to use or disclose Personal Information for their own marketing or other purposes.

Horizon will disclose any Personal Information they collect, use or receive if required or permitted by law, such as to comply with a subpoena, or similar legal process, and when we believe in good faith that disclosure is necessary to protect our rights, protect an individual's safety or the safety of others, investigate fraud, or respond to a government request.

Horizon will not share information about individuals without consent to do so unless the law and our policies allow us to do so.

Retention of information

Horizon will retain and use an individual's Personal Information for the period necessary to comply with their legal obligations, resolve disputes, and enforce their agreements unless a longer retention period is required or permitted by law. Horizon may use any aggregated data derived from or incorporating an individual's Personal Information after they update or delete it, but not in a manner that would identify an individual personally. Once the retention period expires, Personal Information shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after the expiration of the retention period.

The rights of users

The individual may exercise certain rights regarding their information processed by Horizon. In particular an individual has the right to do the following:

- To be informed-in terms of the collection of their data
- To withdraw consent where they have previously given their consent to the processing of their information
- To object to the processing of their information
- To obtain a copy of the information undergoing processing
- To verify the accuracy of their information and ask for it to be updated or corrected
- Under certain circumstances, to restrict the processing of their information
- To request the erasure of their Personal Information
- To receive their information in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance
- To complain to the Information Commissioners Office (ICO) in the event that it is felt that Horizon have not behaved appropriately in terms of an individual's personnel data

The above rights will always be considered but may not be complied with, for example where there are legitimate reasons why Horizon may not be able to agree to a request when the lawful basis for processing is a contract, legal obligation or vital interest.

Privacy of children

If an individual is under the age of 13, any Personal Information submitted through the services and website needs to have prior consent from their parent/legal guardian/carers.

Horizon encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy by instructing their children never to provide Personal Information through the services and website without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Information to Horizon through the services and website, please contact us.

Links to other resources

The website and services contain links to other resources that are not owned or controlled by Horizon. Please be aware that Horizon are not responsible for the privacy practices of such other resources or third parties. Horizon encourage individuals to be aware when they leave the website and services and to read the privacy statements of each and every resource that may collect Personal Information.

Information security

Horizon secure information that an individual provides in a controlled, secure environment, protected from unauthorised access, use or disclosure. Horizon maintain reasonable administrative, technical and physical safeguards in an effort to protect against unauthorised access, use, modification and disclosure of Personal Information in its control and custody. However, no data transmission over the internet or wireless network can be guaranteed. Therefore, while Horizon strive to protect an individual's Personal Information, they must acknowledge the below:

- There are security and privacy limitations of the internet which are beyond Horizons control
- The security, integrity and privacy of any and all information and data exchanged between an individual and the website and services cannot be guaranteed
- Any information and data may be viewed or tampered with in transit by a third party, despite Horizon's best efforts

Data breach

In the event Horizon become aware that the security of the website and services has been compromised or users' Personal Information has been disclosed to unrelated third parties as a result of external activity, including, but not limited to, security attacks or fraud, Horizon reserve the right to take reasonable appropriate measures, including, but not limited to, investigation and reporting, as well as notification to and co-operation with law enforcement authorities. In the event of a data breach, Horizon will make reasonable efforts to notify affected individuals if Horizon believe that there is a reasonable risk of harm to the user as a result of the breach or if notice is otherwise required by law.

Changes and amendments

Horizon reserves the right to modify this Policy or its terms relating to the website and services from time to time at their discretion.

Any updated version of this Policy will be effective immediately upon the posting of the revised Policy unless otherwise specified. An individuals continued use of the website and services after the effective date of the revised Policy (or such other act specified at that time) will constitute an individual's consent to those changes. However, Horizon will not, without an individual's consent, use their Personal Information in a manner materially different than what was stated at the time an individual's Personal Information was collected.

Acceptance of this policy

An Individual acknowledge that they have read and understood this Policy and agree to all its terms and conditions. By accessing and using the website and services an individual agrees to be bound by this Policy. If an individual does not agree to abide by the terms of this Policy, they are not authorised to access or use the website and services.

Contacting Horizon

If you would like to contact Horizon to understand more about this Policy or wish to contact us concerning any matter relating to individual rights and Personal Information, individuals may send an email to info@horizoncommunitytraining.co.uk.
