

## Privacy Notice

This Privacy Notice describes how Octavo Partnership collects, uses and safeguards personal information. When we refer to personal information we mean information or an opinion about you, from which your identity is apparent or can be reasonably ascertained.

We are committed to promoting confidence in how your personal information is handled by us. Confidentiality of your personal data is very important to us.

We endeavour to comply with the UK privacy and data protection requirements both as a data controller and as a data processor. The nature of our services means that our role as a data processor will vary according to the service contract details.

For our service contracts, we may undertake data processing work and have detailed below how this may arise. We may also have access to personal information due to the help we may be asked to provide under a contract for service.

When we are the data processor we will:

- Act on your instructions
- Take appropriate measures to keep personal data secure

When processing data we undertake the following:

- The processing is lawful, fair and transparent
- Data is processed for a specific contracted purpose
- The data will be accurate and kept up to date
- Data is not kept for longer than required
- The data is kept safe and secure

We do not process data outside of the UK.

All our staff have been trained and are familiar with GDPR and their personal responsibilities. Staff sign up to the Octavo Partnership IT Security and Data Usage Policy which sets out how Octavo securely handles and its data.

We consider ourselves to be a data controller for our training course delegate personal information.

## *Data Protection Officer*

We are not required to appoint a Data Protection Officer but have decided to do so voluntarily and our Data Protection Officer is Mr. Gordon Smith.

To contact our Data Protection Officer please email [enquiries@octavopartnership.org](mailto:enquiries@octavopartnership.org) and state 'FAO Data Protection Officer' or write to:

Data Protection Officer  
Octavo Partnership  
4th Floor, The Clock Tower  
Katharine Street  
Croydon  
CR9 1ET

## *Your Rights*

### [Withdrawing Consent](#)

You can at any time amend the personal information that we hold about you and your contact preferences. For example, you can opt in or out of communications from us such as Newsletters, Octavo Partnership marketing and support communications.

You can do this by contacting us at [enquiries@octavopartnership.org](mailto:enquiries@octavopartnership.org) and marking it *Unsubscribe*.

If you already have a user account with us for our online portal you can update your contact preferences or personal information using the portal on our website ([guidance can be found here](#)).

Please note that we do not supply your details to third parties for sales and marketing purposes.

We will send you Octavo Partnership marketing communications only if you have agreed we can do so.

For individuals that opt out of communications, we add these details to a 'suppression list' on our system which allows us to identify users who do not wish to receive marketing communications from us. We retain this suppression list for three years.

## *Lodging a Complaint*

If you wish to make a complaint relating to data, please contact [enquiries@octavopartnership.org](mailto:enquiries@octavopartnership.org) or write to:

Data Protection Officer  
Octavo Partnership  
4th Floor, Croydon Clock Tower  
Katharine Street  
Croydon  
CR9 1ET

## *How do we use personal data?*

Below we detail how we use personal data. For further details about each service area please contact the service for further information.

### *Educational Psychology (EP)*

Pupil specific information is gathered in relation to referrals to Octavo Partnership's Education Psychology Service by schools. This includes a range of sensitive information regarding the family context and the children and young people themselves to aid assessment and intervention.

This data is processed by the EP team only. If there is any commissioned work by Croydon Council then the results are shared with the Council SEN team, parents and the school involved. In the unusual event of a safeguarding concern, personal data may need to be shared with relevant authorities.

Parents and young adults can always ask to see their records or via legal representation if they wish.

Octavo Partnership uses encrypted laptops to carry out this work and uses Croydon Council as a third party for data storage. Paper files are stored using Croydon Council and Octavo Partnership security.

Pupil data is retained in line with national guidance for an extended period to enable all necessary future access.

### Improvement and Development Service

This service is commissioned by the Council or is requested by a school. The service includes training, head teacher performance management, assessment and moderation and therefore personal data may be used to deliver the service requested. The pupil data that may be processed is assessment and attainment information, for example, for Key Stage 1 is the name of the child, school and assessment data.

Data is processed by Octavo Partnership's Improvement and Development staff only. For commissioned work from Croydon Council information may be shared with the council in addition to the school.

Octavo Partnership uses encrypted laptops to carry out this work and Octavo Partnership IT systems and Frontline Data as a third party for data storage.

Paper files are stored using Croydon Council and Octavo Partnership security processes and systems.

Records are retained for one year after completion of a service contract in case of a query or a further support request. The only exception to this would be in the event of a Local Authority investigation.

### Governance

Governor Services maintain a database of governor contact details to provide governors and schools with training, help and guidance and to identify potential new governors. Potential governors and governors can at any time opt out of marketing communications from Octavo Partnership.

The data is only processed by Octavo Governance staff. Personal contact details for the Chair of Governors is only shared with the LA in exceptional circumstances, for example in the event of a fraud investigation, safeguarding issue or allegation against the Headteacher. Octavo Partnership uses encrypted devices to carry out this work and uses Octavo Partnership systems and Frontline Data as a third party for data storage. Paper files are stored using Octavo Partnership security.

Governor records are retained for a period of one year after their term of office has finished.

Clerking Service records are retained for a period of six years in line with the School Governance Regulations.

### Finance Services for Schools

This service is purchased by schools. The service may include processing payroll and pension data on behalf of a school, budget planning and monitoring and so personal data provided by a school may be used to deliver the service.

The data is only processed by Octavo Partnership Finance staff. The information is shared with the school.

Octavo use encrypted devices to carry out this work and use Octavo Partnership systems for data storage. Paper files are stored using Croydon Council and Octavo Partnership security.

Octavo Finance will retain a school's details for a period of one year after a service contract cancellation in the event of a query or further support being needed.

### Information Systems

This service is purchased by schools. Octavo Partnership's Information Systems service keep records of staff that the school has authorised to give permission to systems and information holding personal data and any restoration of file data. Octavo's Information Systems service may use personal data provided by the school to resolve an IT issue for the school.

Octavo use encrypted devices to carry out this work. All school data is kept securely on school premises and backups are generally under the protection of LGfL , a third-party company used by the schools.

Octavo Information Systems (SIMS) may at times request a copy of a school's database (SIMS .net, FMS and Discover) and other files, to resolve a problem reported to the services desk.

Once we have processed the data required on our system, any database or file used will be deleted.

Octavo IT Service Desk will hold a school's details for 6 months after contract cancellation. After this the school's records will be anonymised.

## Human Resources

This service is purchased by schools. Octavo Partnership's Human Resource service includes advice and guidance on specific employee situations and so personal data provided by the school will be used to deliver the service requested.

Data is processed by Octavo Partnership HR staff only.

We retain data for varying periods of time depending on the situation. Our normal practice for the data we process on your behalf will be as follows:

- **Complex employee relations casework:** Nine months after completion of the matter (in sickness cases, the date of completion of the case will be deemed to be when an individual has not hit a trigger for a period of 12 months)
- **Maternity:** 12 months after the date of confinement

We also provide advice of a more general nature, and this will be reviewed, and generally destroyed after two years.

There may be times when we draw up a settlement agreement on your behalf and liaise with unions/solicitors and, in the case of community and VC schools, the Council on your behalf. We will retain hard copy and electronic copies of the settlement agreement for 12 months.

We use encrypted laptops and memory sticks to carry out the work. For some work, we will also have hard copies of the data.

## NQTs

Octavo offers two contracts related to NQT work:

1. Appropriate Body
2. NQT CPD Induction Programme

**Appropriate Body:** Schools submit data about NQTs via the Octavo Partnership online portal and it is retained there for six years after the completion of induction or leaving the school. Processing is carried out in a manner that meets the individual needs in accordance with the statutory framework.

**NQT CPD Induction:** Schools submit data about NQTs via the Octavo Partnership online portal and it is retained for a year after the completion of the NQT induction year.

This information may be processed by Octavo staff using encrypted devices.

### [Our website and purchasing portal \(SLA Online\)](#)

We use cookies on our web site for analytic purposes to collect information in anonymous form about how visitors use our website. We use MailChimp and Google Analytics to help us with analysis of our marketing data.

We may use external web services on our website and within our training courses to display content within our web pages. We cannot prevent these sites, or external domains, from collecting information on your usage of this embedded content.

We may link information automatically logged by other means with personal data about specific individuals. However, we will only use this information to help us respond to a query that you have contacted us about.

Our mailing list is updated weekly based on the new users added to our purchasing portal who have given us positive, active, unambiguous consent by completing our new user request form. A new file of the mailing list is saved every month and retained for three months and during the fourth month it is deleted from our system.

Schools will be contacted at least annually and asked to keep details of their school and users up to date and accurate. At the end of each academic year a list of a school's staff users will be sent to them to be updated for the forthcoming academic year.

Octavo Partnership will regularly monitor user accounts on SLA Online and delete accounts and personal details which have been inactive for more than three years.

### [Suppliers](#)

To enable us to process data we use third party suppliers. We seek assurances from them that they have policies and processes in place to securely protect data. Our suppliers will change from time to time depending on the nature of our service contracts.

Our suppliers include:

- Microsoft
- Google
- Peach Technologies
- Frontline Data
- Croydon Local Authority
- Mail Chimp
- LGfL
- ICA Digital Ltd
- Unipress
- Virgin
- O2
- HCSS

## *Security of Data*

We protect the quality and integrity of your personally identifiable information through having technical safeguards, remote and secure back up arrangements, training our staff, and the Octavo Partnership policies and procedures. These protect the personal data that we have under our control from:

- Unauthorised access
- Improper use or disclosure
- Unauthorised modification
- Unlawful destruction or accidental loss

All our staff and suppliers, who are associated with the processing of personal data, are required to respect the confidentiality of our customer's personal data.

## *Questions*

If you have any questions or would like more information, please contact our Data Protection Officer at [enquiries@octavopartnership.org](mailto:enquiries@octavopartnership.org).