

The Education People

WEBSITE PRIVACY STATEMENT

Edseco Ltd trading as The Education People is registered as a 'Data Controller' under the Data Protection Act 2018. We are a registered fee payer with the Information Commissioner's Office (ICO) and Our ICO registration number is ZA486930. You can view [Our entry on the ICO data protection register](#). Our site, www.theeducationpeople.org (our "Site"), is owned and operated by Edseco Ltd.

The Education People understands that your privacy is important to you and that you care about how your information is used and shared online. We respect and value the privacy of everyone who visits Our Site and with whom we interact when providing our services, and we will only collect and use information in ways that are useful to you and in a manner consistent with your rights and our obligations under data protection law.

This statement applies to Our use of any and all data collected by Us in relation to your use of Our Site and Our services. This statement explains how We may collect and use information about you collected through Our Site and Our services. Various forms on Our Site invite you to submit your contact details and other information about you or your organisation, or to send Us emails (which will of course identify you). In each case the purpose for which you are submitting your details will be made clear.

Please read this statement carefully and ensure that you understand it. If you do not accept and agree with this statement, you must stop using Our Site immediately.

The Education People provide a range of statutory duties on behalf of Kent County Council and other services and collects personal data for many purposes. Each service that collects personal data therefore provides a separate privacy statement which provide further detail as to the purpose and legal basis for that service. These privacy statements are provided by Kent County Council.

This privacy statement explains how We collect personal data through Our Site and provides general information about how We process personal data in connection with Our services, to make sure you have the information you need.

To understand how your personal information (or 'personal data' as it is referred to in applicable data protection law) is processed in relation to any services you receive from The Education People, please view the service specific privacy statement by using the links below, or contact the service directly to ask about your personal circumstances:

- [Supported Employment](#)
- [Governor Services](#)
- [CPDOnline](#)
- [Kent Choices](#)
- [NEETs](#)
- [Work experience](#)
- [NQTs](#)
- [Kent Children's University](#)
- [Early Years and Childcare \("EYC"\)](#)

If you have any questions about Our Site or Our services, please contact Us by email at hello@theeducationpeople.org, by telephone on 0345 604 1699, or by post at the registered company address.

1. Definitions and Interpretation

In this statement the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of Our Site;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 12, below;
“Our Site”	means this website www.theeducationpeople.org
“We/Us/Our”	means Edseco Ltd trading as The Education People (part of the Commercial Services Group), Reg. No. ZA486930, whose registered address is 1 Abbey Wood Road, Kings Hill, West Malling, Kent, ME19 4YT.

2. Scope – What Does This Policy Cover?

- 2.1 This privacy statement applies only to your use of Our Site and Our services. It does not extend to any websites that are linked to from Our Site (whether we provide those links or whether they are shared by other users). We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy statements of any such websites before providing any data to them.
- 2.2 This privacy statement applies to you if you are a customer, supplier, visitor to our Site or applicant for a job with us. For the purposes of this privacy statement:
- Applicants – an individual who is applying for a job with us.
 - Customer – any person who purchases any of Our services, or any individual who works for an organisation which purchases any of Our services, or any person who is a customer of, or any other individual who interacts with, an organisation to whom we provide Our services (such as EYC providers and parents/children).
 - Supplier – business contacts in our supplier organisations.
 - Site Visitors – anyone who visits Our Site.
 - Outdoor Learning User – any person who purchases products or services via our Outdoor Learning booking portal whether for themselves or on behalf of a third party, including children.

3. How and What Data Do We Collect?

- 3.1 Some data will be collected automatically by Our Site (for further details, please see section 12 on Our use of Cookies and Our cookie policy), other data will only be collected if you voluntarily submit it, for example, when signing up for an Account.
- 3.2 Depending upon your use of Our Site and Our services, We may collect some or all of the following personal data about you:
- 3.2.1 name and other identifiers such as National Insurance number;
- 3.2.2 business/company/organisation name and job title;

- 3.2.3 contact information such as email addresses and telephone numbers;
- 3.2.4 information we collect in connection with the services we provide on behalf of Kent County Council, including but not limited to parental declarations provided to Early Years and Childcare teams in respect of Free Early Education entitlement and your child's attendance at an EYC provider;
- 3.2.5 demographic information such as post code, preferences and interests;
- 3.2.6 IP address (automatically collected);
- 3.2.7 web browser type and version (automatically collected);
- 3.2.8 operating system (automatically collected);
- 3.2.9 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to (automatically collected);
- 3.3 Our Education Safeguarding Service will collect personal data about individuals when conducting investigations and consultations, including information about teachers and other staff and parental and child views and statements.
- 3.4 In respect of Outdoor Learning Users We may collect some or all of the personal data set out at section 3.2 above which may include personal data provided in respect of any third party, including children, for whom you may purchase products or services for.

4. How Do We Use Your Data?

- 4.1 All personal data is processed and stored securely. We will only use your personal data when the law allows Us to do so. Most commonly, We will use your personal data in the following circumstances:
 - Where We need to perform the contract we are about to enter into or have entered into with you.
 - Where it is necessary for Our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. The legitimate interests We rely on are set out next to each purpose below.
 - Where We need to comply with a legal obligation.
- 4.2 Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your explicit consent to process any special categories of data. If we rely on your consent to process personal data, you may withdraw your consent at any time (see section 9 below).
- 4.3 We will comply with Our obligations and safeguard your rights under data protection laws at all times.
- 4.4 We may use the personal data that We collect for the following purposes. For each purpose, We describe the legal bases We rely on to justify such use of your personal data.

Category	Purpose/Activity	Type of data	Legal basis
Applicant	To consider you for a role, if you are applying for a job with Us	(a) Applicant's identity and contact details (b) Education and career history	(i) Necessary to take steps in order to enter a contract with you (ii) Necessary for Our legitimate interests in attracting good quality candidates for The Education People (iii) To comply with Our legal obligations, such as to make reasonable adjustments

Category	Purpose/Activity	Type of data	Legal basis
Customer	To provide Our services to you, or your employer if We provide services to your employer, and to manage our relationship with you including managing your account, communicating with you about Our services and to provide you with updates to Our privacy statement	(a) Your identity and contact details (b) Information about your use (or your employer's use) of Our services, and communications between Us and you	(i) Performance of a contract with you (if the services are provided to you directly) (ii) Necessary for Our legitimate interests in providing Our services to your employer (iii) Complying with a legal obligation, where We provide statutory services to you
Outdoor Learning Users	To provide Our services to you, and to the individuals for whom you have purchased our services, to manage our relationship with you and to provide you with information about our services including providing you with marketing information	(a) Your identity and contact details (b) Information about your use of Our services, and communications between Us and you (c) Your marketing and communication preferences	(i) Performance of a contract with you and/or the individual for whom you have purchased services (ii) Necessary for Our legitimate interests to conduct direct marketing to our current and prospective Outdoor Learning Users
EYC Customers	To enable you to claim the correct Free Early Education entitlement for your child , and to enable us to provide compliance checks to EYC providers to ensure Free Early Education is being correctly provided.	(a) Your identity and contact details (b) Information contained in parental declarations you provide to the EYC provider in respect of Free Early Education entitlement (c) Details of your child's attendance at the EYC provider (d) Reports provided to us by the KCC Management Information and Intelligence Team	(i) Performance of a contract between you and your EYC provider (ii) Necessary for Our legitimate interests in providing compliance checks to EYC providers, and for the legitimate interests of EYC providers, The Education People and any person authorised by KCC to ensure that parents receive their correct entitlement to Free Early Education
KEY Stronger Practice Hub (KEYSPH) Users	To enable you to access and participate in the KEYSPH programme of communications, support mailbox, funded training and evidence-based programmes, networking opportunities and open days.	(a) Your name (b) Your setting name (c) Your or your setting address (d) Your business or personal email address and telephone number (e) Your Ofsted URN	Necessary for our legitimate interests in providing support services under the Stronger Practice Hubs programme, an initiative run on behalf of the Department for Education.
Education Safeguarding Service – Support Package users	To provide Our services to you, and to the individuals for whom you have purchased our services, to manage our relationship with you and to provide you with information about our services including providing you with marketing information.	(a) Your identity and contact details (b) Information about your use of Our services, and communications between Us and you (c) Your marketing and communication preferences	(i) Performance of a service level agreement between you and the Education Safeguarding Service (ii) Necessary for Our legitimate interests to provide our services to and to conduct direct marketing to our current and prospective Education Safeguarding Service Users

Category	Purpose/Activity	Type of data	Legal basis
Education Safeguarding Service – investigations	To conduct investigations about you and to conduct consultations as requested by education settings, including liaising with governors, teachers and authorised staff, Local Authority Designated Officers and parents.	(a) Your identity and contact details (b) Information gathered during the investigation including interviews, notes and parental statements (c) Information about your use of Our services, and communications between Us and you	(i) Necessary for Our legitimate interests in supporting our clients with fulfilling their statutory safeguarding duties under Government safeguarding guidance
Supplier	To carry out Our contractual obligations to you, if you are Our supplier or subcontractor, or your employer if you work for one of Our suppliers, including to manage Our payments to you	(a) Your identity and contact details (b) Information about our use of your services (or your employer's services), and communications between Us and you (c) Information about Our payments to you	(i) Performance of a contract with you (if the services are provided to you directly) (ii) Necessary for Our legitimate interests in receiving services from Our suppliers to ensure our business is run efficiently
Customer	Provide you with newsletters and marketing information related to Our services and activities which you request from us or which we feel may be of interest to you, and to enable us to analyse use of Our services and create marketing and promotional plans	(a) Your identity and contact details (b) Information about your use of Our services (c) Your marketing and communication preferences	(i) Necessary for Our legitimate interests to conduct direct marketing to our current Customers (ii) Where you are a prospective Customer, We will obtain your opt-in consent to send you marketing communications
Customer	Market Research purposes - for assessment and analysis of Our Customers, to create sales, marketing and promotional plans and to seek your thoughts and opinions on the services We provide	(a) Identity and contact details of Customers (b) Information about your use of Our services	Necessary for Our legitimate interests to study how our Customers use Our services, to develop Our services and to inform Our marketing strategy
All users of our Site	For security purposes and to administer Our Site – to provide you with access to Our Site, to maintain and enhance the Site and to ensure that content from it is presented in the most effective manner for you and your computer, and to enhance the user experience	Technical information including your IP address, the type of browser you use and other information as set out in our cookies policy	(i) Necessary for Our legitimate interests in running Our business, to ensure the security of Our systems, to assist us in the provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or company restructuring exercise (ii) Necessary to comply with a legal obligation
All categories	Business purposes - for business monitoring, improving Our services, and record keeping including maintaining Our accounts, complying with good practice and for other administrative, operational and security reasons	(a) Your identity and contact details (b) Information about your use of Our services and about any complaints or enquiries you have made to Us	(i) Necessary for Our legitimate interests in running Our business efficiently and successfully and in order to keep Our records updated (ii) Necessary to comply with a legal obligation

Category	Purpose/Activity	Type of data	Legal basis
All categories	To prevent and detect crime, fraud or corruption and to meet Our legal, regulatory and ethical responsibilities	(a) Your identity and contact details (b) Your IP address (c) Information about your use of Our services and about any complaints you have made to Us	Necessary to comply with Our legal obligations

- 4.5 We have put in place appropriate physical and technical measures to safeguard your personal data. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- 4.6 Your personal data may be shared with relevant teams within The Education People or with external partners and agencies involved in delivering services on Our behalf.
- 4.7 The Education People may use personal data to identify individuals who need additional support during emergencies or major incidents
- 4.8 By opting into communications from Us, you agree to communications by the following methods; telephone, email, and post. You may unsubscribe or opt-out at any time by contacting us or via the unsubscribe links provided.

5. How and Where Do We Store Your Data?

- 5.1 We only keep your data for as long as We need to in order to use it as described above in section 4, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements, and/or for as long as We have your permission to keep it.
- 5.2 To determine the appropriate retention period for personal data, We consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which We process your personal data and whether We can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- 5.3 However, emails that we send to you or you send to us may be retained as a record of contact and your email address stored for future use in accordance with our record retention schedule.
- 5.4 To understand how your personal data is retained in relation to any services you receive from The Education People, please contact the service directly to ask about your personal circumstances.
- 5.5 If The Education People needs to email sensitive or confidential information to you, we will perform checks to verify the correct email address and may take additional security measures. If sending us such information we recommend using our secure online forms where provided, or the postal service. We may also retain your personal data for a longer period in the event of a complaint or if We reasonably believe there is a prospect of litigation in respect of Our relationship with you.
- 5.6 We may process your personal data using web services, IT administration and support services hosted outside the European Economic Area, but only where a data processing agreement is in place that complies with obligations equivalent to

those of the Data Protection Act.

- 5.7 Notwithstanding the security measures that We take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to Us data via the internet.
- 5.8 When your personal data is no longer required for the purpose it was collected or as required by applicable law, it will be deleted and/or returned to you in accordance with applicable law.
- 5.9 In some circumstances you can ask Us to delete your personal data (see section 9).

6. **Do We Share Your Data?**

- 6.1 The Education People does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.
- 6.2 The Education People does not disclose or share sensitive or confidential information without your explicit consent except in a small number of situations where disclosure is required by law, or where we have good reason to believe that failing to do so would put you or someone else at risk.
- 6.3 We share personal data with Kent County Council where it is required in connection with the statutory duties we provide on the council's behalf. For example, information we collect in connection with providing compliance checks to KCC in respect of EYC providers may be shared with KCC's Management Information Team and the Fraud team at KCC in the event of an investigation.
- 6.4 When our Education Safeguarding Service conducts investigations, we share personal data with relevant stakeholders who participate in the investigation including governors, authorised staff at the education setting, the Local Authority Designated Officer and parents.
- 6.5 We may sometimes contract with third parties to supply services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data. We may also share personal data with our external advisors, such as our legal advisors. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- 6.6 We may compile statistics about the use of Our Site and Our services including data on traffic, usage patterns, user numbers, sales and other information. All such data will be anonymised and will not include any personally identifying information. We may from time to time share such data with third parties such as prospective investors, affiliates, partners and advertisers. Data will only be shared and used within the bounds of the law.
- 6.7 In certain circumstances We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with the requirements of legislation, a court order, or a governmental authority. We do not require any further consent from you in order to share your data in such circumstances and will comply as required with any legally binding request that is made of Us.
- 6.8 The KEYSPPH is one of 18 Stronger Practice Hubs appointed by the Department for Education (DfE). Our vision is to support early years settings to address the impact of the pandemic on young children. The KEYSPPH aims to unlock potential

for the children and practitioners across its region - Kent, Medway, Surrey, East Sussex, West Sussex, Brighton and Hove and Isle of Wight.

Each Stronger Practice Hub will support settings to adopt well-evidenced practice improvements by:

- Establishing local networks of settings to share knowledge and effective practice.
- Proactively sharing information and advice on evidence-based approaches, for example, through newsletters, blogs and social media.
- Acting as a point of contact for bespoke advice, and signposting to other funded support.

When providing our Stronger Practice Hub services, we may be required to share your information with the Department for Education, the National Children's Bureau, the Education Endowment Foundation (EEF), individual providers of funded programmes recommended by the EEF and with the independent research organisation IFF.

The [Department for Education's Privacy Notice](#) relates to all organisations involved in the Stronger Practice Hub Programme.

7. **International Transfer of Data**

- 7.1 The personal data that We collect from you may be stored and processed in your region, or transferred to, stored at or otherwise processed outside the European Economic Area ("EEA").
- 7.2 By using Our Site and Our Services, and/or providing Us with your personal data, you acknowledge that We will collect, transfer, store and process your information outside the EEA. We will take all steps reasonably necessary to ensure that your personal data is kept secure and treated in accordance with this privacy statement and the requirements of applicable law wherever the data is located.
- 7.3 Where We transfer your personal data outside the EEA to third parties, We will ensure that appropriate transfer agreements and mechanisms, such as the EU Standard Contractual Clauses, are in place to help ensure that our third party service providers provide an adequate level of protection to your personal data. We will only transfer your personal data outside the EEA in accordance with applicable laws or where you have given Us your consent to do so.

8. **What Happens If Our Business Changes Hands?**

- 8.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Data provided by users will, where it is relevant to any part of Our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use the data for the purposes for which it was originally collected by Us.
- 8.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

9. Your rights

We will collect, store and process your personal data in accordance with your rights under any applicable data protection laws. Under certain circumstances, you have the following rights in relation to your personal data:

- 9.1 **Subject Access** - you have the right to request details of the personal data which We hold about you and copies of such personal data.
- 9.2 **Right to Withdraw Consent** – where you have consented to Our processing of your personal data, you have the right to withdraw such consent at any time.
- 9.3 **Data Portability** – you may, in certain circumstances, request Us to port (i.e. transmit) your personal data directly to another organisation or to you.
- 9.4 **Rectification** – We want to ensure that the personal data about you that We hold is accurate and up to date. If you think that any information We have about you is incorrect or incomplete, please let Us know. To the extent required by applicable laws, We will rectify or update any incorrect or inaccurate personal data about you.
- 9.5 **Erasure ('right to be forgotten')** - you have the right to have your personal data 'erased' in certain specified situations.
- 9.6 **Restriction of processing** – you have the right in certain specified situations to require Us to stop processing your personal data. This may delay or prevent us delivering a service to you. We will seek to comply with your request but may be required to hold or process data to comply with our legal duties).
- 9.7 **Object to processing** – You have the right to object to specific types of processing of your personal data, such as, where We are processing your personal data for the purposes of direct marketing.
- 9.8 **Prevent automated decision-taking** – in certain circumstances, you have the right not to be subject to decision being taken solely on the basis of automated processing.

Please be aware that these rights may **not be available** to the extent that the exercise of such rights would prejudice a due process or activity, or where the circumstances are such that third party personal data needs to be protected more than usual, for example where it involves special categories of data or where the identity of the third party must not be disclosed.

10. Your Right to Withhold Information

- 10.1 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.
- 10.2 If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as providing you with the services you have requested).
- 10.3 You may restrict your internet browser's use of Cookies.

11. Cookies

- 11.1 Please refer to our cookie policy for information on how Our Site uses cookies and similar technologies in order to distinguish you from other users at www.theeducationpeople.org/cookie-policy.

12. **Contacting Us**

12.1 If you wish to enforce any of your rights under applicable data protection laws, we will respond to your request without undue delay and by no later than one month from receipt of any such request, unless a longer period is permitted by applicable data protection laws.

13. **Questions and complaints**

13.1 Please contact our Data Protection Officer at the address below if you either:

- have any questions about anything in this document
- think that your personal data has been misused or mishandled
- wish to request a copy of any of your personal data held by Us (where such data is held) by making a subject access request (SARS)

Peter Baldock, Data Protection Officer - Commercial Services Group
1 Abbey Wood Road, Kings Hill, West Malling, Kent ME19 4YT

Email: dpo@csLtd.org.uk

13.2 You can also make a complaint to the Information Commissioner, who is an independent regulator.

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Email: casework@ico.org.uk

Contact form: <https://ico.org.uk/global/contact-us/email/>

Telephone: 0303 123 1113

Textphone: 01625 545860

14. **Changes to Our Privacy Statement**

14.1 We may change this privacy statement as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the privacy statement on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

14.2 We will provide notice to you if these changes are material and, where required by applicable law, We will seek your consent. We will provide this notice by email or by posting notice of the changes on Our Site.

Date last updated: November 2023