

Thrive Online Privacy Policy

YOUR PRIVACY

Thrive Online (“TOL”) is a portal for schools, academies and other organisations to allow online assessment of children via www.thriveapproach.com or the app provided by Thrive. We are committed to ensuring that whilst you use TOL, the security and confidentiality of your personal information is of utmost importance.

WHAT IS THE PURPOSE OF THE PRIVACY POLICY?

The organisation named above is a “data controller” which means we have to tell you certain information about how we collect and then use your personal data.

TOL contains a number of pages where you can provide us with information, for example, when you fill in an assessment.

TOL is owned and operated by Thrive – the trading name for Fronting the Challenge Projects Limited who act as a data processor on our behalf.

If you have any queries about our information that is collected in Thrive-Online, please contact our Data Protection Officer (dpo@thriveapproach.com).

This Privacy Policy relates to your use of TOL and tells you:

- What personal information is collected
- How we collect personal information
- How we use personal information
- Who we may share personal information with
- How long we keep personal information
- Any transfer of personal information outside of the EEA
- What we do to protect personal information
- What choices you have in relation to you or your child’s personal information

We last updated this Privacy Policy on 18th May 2018.

PERSONAL INFORMATION WE PROCESS ABOUT YOU

What personal information we process

Personal Information you give us

Parents, our employees and others working for us may submit personal information to TOL relating to themselves or children being assessed within our organisation.

TOL may collect the following information about a child:

- Name
- Schools, academies and other organisations attended by the child
- Gender
- Date of birth

- Information about the education of the child
- information about social and emotional development
- information about the behaviour of the child
- Information about other agencies involved with the child
- Action plans and strategies for working with the child

TOL may collect the following information about parents, guardians and families:

- Name
- Email address
- Mobile phone number

TOL will use your Member details to recognise your login and this will be subject to the General Privacy Policy.

Sensitive Personal Information

Whilst we do not intend users to input sensitive personal information into TOL, this may occur on an infrequent basis as a result of inputting information about a child's assessment, activities or strategy. This may relate to a child's mental or physical condition. We would ask that you avoid doing this if at all possible. If we collect such sensitive personal information then we will tell the parent/guardian or child (where applicable) and will give clear and explicit information on how we will use the information and what we do with it.

Children

TOL is not intended for use by individuals under the age of 18 years and so if you are under this age please do not provide any personal information to us without the consent of your parent or guardian. As a parent or legal guardian please do not allow your children to submit personal information without your permission.

Personal Information we collect automatically

When you use TOL, we may collect certain information automatically such as:

- IP addresses (the name and internet address your device uses to identify itself to us)
- Your activity in TOL including times and dates of visits

If you want to know more about how we use cookies, please see our cookie statement.

HOW WE USE THE PERSONAL INFORMATION

Our legal basis for using the information

The law only allows us to use the personal information in certain limited circumstances. We will most commonly use it:

- Where we need to comply with a legal obligation (e.g. the provision of education)
- Where we have consent (e.g. where a parent/guardian or child has consented)
- Where it is necessary for our legitimate interests (or those of a third party) and the child's interests and fundamental rights do not override those interests (e.g. this may apply where we believe that it is necessary to further the education of the child)

What this means in practice

Any personal information that you give to us may be used in the following ways:

- to carry out assessments using TOL

- to compile both group and individual action plans
- assessments may be carried out by a member of staff, using an automated process (with human intervention)
- to manage online accounts of employees, parents/guardians
- to prevent and detect fraud
- to help us improve Thrive-Online to make it better for all users
- to administer Thrive-Online (such as troubleshooting, data analysis, research)

Statistics

We (or our third party processors) may use personal information from children, parents, schools and other organisations to produce statistics. These statistics will be anonymised so that no individual can be identified from them. The statistics will be used to help us improve our services and to plan for new services.

SHARING YOUR PERSONAL INFORMATION

Agencies involved with your child

Information input into TOL may be shared with other agencies involved with the child such as the local authority, childrens' services and health services. We inform parents/guardians and obtain consent unless we are required to obtain involvement due to safeguarding or other issues relating to the safety or welfare of the child.

Business Partners

We may share your information with carefully selected third parties including:

- Business partners, suppliers and subcontractors for the performance of any contract we enter into with them or you.
- Analytics and search engine providers that assist us in the improvement and optimisation of our system.

Details of organisations we work with

We work with the following organisations:

- Totally Communications (www.totallycommunications.com) (Who supply support and maintenance)
- Amazon AWS (Providing cloud services)
- Fronting the Challenge Projects Ltd (known as Thrive, providers of Thrive-Online)

Legal Requirements and Law Enforcement

We may also disclose your personal information to third parties:

- If we are required by law, or in order to enforce or apply our terms of use. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Third Party Privacy Policies

TOL may contain links to websites owned by other organisations. If you follow a link to another website, these websites they will have their own privacy policy. We suggest that you check the policies of any other websites before giving them your personal information as we cannot accept responsibility for any other website.

KEEPING YOUR PERSONAL INFORMATION

How we store your personal information

The security of your personal information is really important to us. We use appropriate technical and organisational measures to safeguard personal information. We use encryption technology where appropriate to enhance privacy and help prevent information security breaches. We use industry-standard measures and processes for detecting and responding to inappropriate attempts to breach our systems.

Any personal information that you provide to us will be held within the EEA.

All third parties who provide services to the Thrive-Online are required to sign contract requiring them to have appropriate technical, administrative and physical procedures in place to ensure that your information is protected against loss or misuse.

Retention of information

We only hold personal information for as long as necessary for the purposes for which we collected it.

We have a retention policy which lays down timescales for the retention of information.

Thrive-Online will retain the personal information for a period of twelve years from the last record being created.

YOUR RIGHTS

Access to information

Everybody has the right to access information that we hold about them. To receive a copy of the information that we hold, please contact our Data Protection Officer.

Changing or deleting your information

We can be asked at any time to change, amend or delete the information that we hold. We can be asked to restrict the information that we process .

Right to prevent Automated decision making

We can be asked to stop any automated decision making. We do not intentionally carry out such activities, but if you do have any questions or concerns we would be happy to discuss them with you and you can contact our Data Protection Officer.

Transferring Personal Information

Everybody has the right to request that their personal data is transferred by us to another organisation (this is called “data portability”). Please contact our Data Protection Officer with the details of what you would like us to do and we will try our best to comply with your request. It may not be technically feasible, but we will work with you to try and find a solution.

Complaints

If you make a request to us under this Privacy Policy and you are unhappy with the response, you can ask for the request to be reviewed under our internal complaints procedure. Our internal complaints procedure allows your request to be reviewed by our Data Protection Officer who will do their best to try and resolve the issue.

If you have been through the internal complaints procedure and are still not happy with the result, then you have the right to complain to the Information Commissioner’s Office. They can be contacted as follows:

Website: www.ico.org.uk

Telephone: 03031231113

Address: Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Changes to our Privacy Policy

We review our Privacy Policy on a frequent basis to check that it accurately reflects how we deal with personal information and may amend it if necessary. You should check this page regularly to see the most up to date information.

How to Contact us

We welcome questions, comments and requests regarding this Privacy Policy which can be sent to our Data Protection Officer (dpo@thriveapproach.com).