

# **ALP Schools - Privacy Notice**

## **Introduction**

ALP Schools comply with EU General Data Protection Regulation (GDPR). In terms of your right to be informed, we will inform you about the way in which we use, share and store your personal information.

We have published this privacy notice so you can access this information, along with information about the increased rights you have in relation to the information we hold on you and the legal basis on which we are using it.

## **How we use your information**

This privacy notice tells you what to expect when ASD Learning Ltd / ASD Learning (Midlands) Ltd (ALP Schools) collects personal information. It applies to information we collect about:

- [visitors to our websites;](#)
- [complainants and other individuals in relation to a data protection or freedom of information complaint or enquiry;](#)
- [people who use our services, eg who subscribe to our newsletter or request a publication from us;](#)
- [people who notify under the Data Protection Act;](#)
- [job applicants and our current and former employees.](#)

## **Visitors to our Websites**

When someone uploads their CV via the vacancies section that data will be permanently stored on the staff access area of the website. All CV's are periodically permanently deleted.

## **Use of cookies**

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The table below explains the cookies we use and why.

## **How do I change my cookie settings?**

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

Find out how to manage cookies on popular browsers:

- [Google Chrome](#)
- [Microsoft Edge](#)

- [Mozilla Firefox](#)
- [Microsoft Internet Explorer](#)
- [Opera](#)
- [Apple Safari](#)

To find information relating to other browsers, visit the browser developer's website.

### **Links to other websites**

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

### **WordPress**

We use a third party service, WordPress.com, to publish our website, and our individual microsites. These sites are hosted at WordPress.com, which is run by Automattic Inc. We use a standard WordPress service to collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it. WordPress requires visitors that want to post a comment to enter a name and email address. For more information about how WordPress processes data, please [see Automattic's privacy notice](#).

### **People who contact us via social media**

If you send us a private or direct message via social media the message will remain on that platform. It will not be shared with any other organisations.

### **People who call our main telephone number:**

When you call us we collect Calling Line Identification (CLI) information. We use this information to help improve its efficiency and effectiveness.

Our calls are also recorded for training and monitoring purposes and this is clearly explained on a voice recorded message.

### **People who email us**

We use Transport Layer Security (TLS) to encrypt and protect email traffic. We also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

### **People who make a complaint to us**

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

### **People who use our services**

We process personal data about prospective, current and past: pupils and their parents; staff, suppliers and contractors; donors, friends and supporters; and other individuals connected to or visiting ALP Schools.

The personal data we process takes different forms – it may be factual information, expressions of opinion, images or other recorded information which identifies or relates to a living individual. Examples include:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- family details;
- admissions, academic, disciplinary and other education related records, information about special educational needs, references, examination scripts and marks;
- education and employment data;
- images, audio and video recordings;
- financial information
- courses, meetings or events attended.

As a chain of Independent schools, we need to process special category personal data (eg concerning health, ethnicity, religion or biometric data) and criminal records information about some individuals (particularly pupils and staff). We do so in accordance with applicable law (including with respect to safeguarding or employment) or by explicit consent.

### **Collecting, Handling and Sharing Personal Data**

We collect most of the personal data we process directly from the individual concerned (or in the case of pupils, from their parents). In some cases, we collect data from third parties (for example, referees, previous schools, the Disclosure and Barring Service, or professionals or authorities working with the individual) or from publicly available resources.

Personal data held by us is processed by appropriate members of staff for the purposes for which the data was provided. We take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. We do not transfer personal data outside of the European Economic Area unless we are satisfied that the personal data will be afforded an equivalent level of protection.

In the course of school business, we share personal data (including special category personal data where appropriate) with third parties such as examination boards, the school's professional advisors and relevant authorities (eg the Local Children Safeguarding Board, DBS and Immigration, HM Revenue and Customs, Department for Education and Department for Work and Pensions).

### **Purposes For Which We Process Personal Data**

We process personal data to support the school's operation as follows;

- The selection and admission of pupils;
- The provision of education to pupils including the administration of the school curriculum and timetable; monitoring pupil progress and educational needs; reporting on the same internally and to parents; administration of pupils' entries to public examinations, reporting upon and publishing the results; providing references for pupils (including after a pupil has left);
- The provision of educational support and related services to pupils (and parents) including the maintenance of discipline; school trips; provision of the school's IT and communications system and virtual learning environment (and monitoring the same) all in accordance with our IT policies;
- The safeguarding of pupils' welfare and provision of pastoral care, welfare, health care services by school staff.
- Compliance with legislation and regulation including the preparation of information for inspections by the Independent Schools Inspectorate, submission of annual census information to the Department for Education;
- Operational management including the compilation of pupil records; the administration of invoices, fees and accounts; the management of the school's property; the management of security and safety arrangements; management planning and forecasting; research and statistical analysis; the administration and implementation of the school's rules and policies for pupils and staff; the maintenance of historic archives and other operational purposes;
- Staff administration including the recruitment of staff/ engagement of contractors (including compliance with DBS procedures); administration of payroll, pensions and sick leave; review and appraisal of staff performance; conduct of any grievance, capability or disciplinary procedures; and the maintenance of appropriate human resources records for current and former staff; and providing references;
- The promotion of the schools through our own websites, the prospectus and other publications and communications (including through our social media channels); and
- Maintaining relationships with the other educational providers and the wider school community by communicating with the body of current and former pupils and/or their parents or guardians and organising events.

The processing set out above is carried out to fulfil our legal obligations (including those under staff employment contracts). We also expect these purposes to form our legitimate interests.

### **Job applicants, current and former employees**

If you have any queries about the process or how we handle your information please contact us at [info@alpschools.org](mailto:info@alpschools.org)

### **What will we do with the information you provide to us?**

All of the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

### **What information do we ask for, and why?**

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for but it might affect your application if you don't.

### **Application stage**

If you use our online application system, this will be collected by a data processor on our behalf (please see below).

We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Key staff members involved in the specific recruitment will have access to all of this information.

You will also be asked to provide equal opportunities information. This is not mandatory information – if you don't provide it, it will not affect your application. This information will not be made available to any staff outside of our recruitment team, in a way which can identify you. Any information you do provide, will be used only to produce and monitor equal opportunities statistics.

### **Shortlisting**

Our Senior Management Team in each school shortlist applications for interview.

### **Assessments**

We might ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test or we might take interview notes. This information is held by the company only.

If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of six months. If you say yes, we would proactively contact you should any further suitable vacancies arise.

### **Conditional offer**

If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

You will therefore be required to provide:

- Proof of your identity – you will be asked to attend our office with original documents, we will take copies.
- Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies.
- You will be asked to complete a criminal records declaration to declare any unspent convictions.
- We will provide your email address to the Government Recruitment Service who will contact you to complete an application for an advanced Criminal Record check via the Disclosure and Barring Service, or Access NI, which will verify your declaration of unspent convictions.
- We will contact your referees, using the details you provide in your application, directly to obtain references
- We will also ask you to complete a questionnaire about your health. This is to establish your fitness to work. This is done through a data processor (please see below).

### **If we make a final offer, we will also ask you for the following:**

- Bank details – to process salary payments
- Emergency contact details – so we know who to contact in case you have an emergency at work.

### **Use of data processors**

Data processors are third parties who provide elements of our recruitment service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

### **NOW Pensions**

Likewise, if you qualify your details will be provided to NOW Pensions who are the administrators of the Pension Scheme. You will be auto-enrolled into the pension scheme and details provided will be your name, date of birth, National Insurance number and salary. Your bank details will not be passed on at this time.

### **Private Health Care**

Benenden Health provide our staff healthcare as a benefit/incentive to members of staff who opt in

Here is a link to their Privacy Notice.

<https://www.benenden.co.uk/privacy-policy/>

### **How long is the information retained for?**

If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment. This includes your criminal records declaration, fitness to work, records of any security checks and references.

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the campaign.

Information generated throughout the assessment process, for example interview notes, is retained by us for 6 months following the closure of the campaign.

Equal opportunities information is retained for 6 months following the closure of the campaign whether you are successful or not.

### **How we make decisions about recruitment?**

Final recruitment decisions are made by the school's Senior Management Team and members of the recruitment panel. All of the information gathered during the application process is taken into account.

You are able to ask about decisions made about your application by speaking to your contact within our recruitment panel or by emailing [info@alpschools.org](mailto:info@alpschools.org)

### **Your rights**

Under the Data Protection Act 1998, you have rights as an individual which you can exercise in relation to the information we hold about you.

You can read more about these rights here –

<https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

### **Complaints or queries**

ASD Learning Ltd / ASD Learning (Midlands) Ltd tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of the company's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

If you would like to make a complaint about the way we have processed your personal information, you can contact us – [david.cowell@alpschools.org](mailto:david.cowell@alpschools.org).

### **Access to personal information**

We try to be as open as we can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 1998. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request for any personal information we may hold you need to put the request in writing addressing it to our DPO or writing to the address provided below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes by, contacting us.

### **Disclosure of personal information**

In many circumstances we will not disclose personal data without consent. However when we investigate a complaint, for example, we will need to share personal information with the organisation concerned and with other relevant bodies.

### **Changes to this privacy notice**

We keep our privacy notice under regular review. This privacy notice was last updated on 25 May 2018.

### **How to contact us**



If you would like to request information about our privacy notice you can email us or write to:

ASD Learning Ltd

42 - 46 Harmer Street

Gravesend

Kent

DA12 2AX

Email - [info@alpschools.org](mailto:info@alpschools.org)

Tel - 0203 1373630