ALTRINCHAM PREPARATORY SCHOOL

Privacy Notice

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Responsible Person:	Mr Nick Vernon–Headmaster
Date of last review:	October 2026 (D Barber)
Summary of changes:	To include updates as directed by ISBA
Date of next review:	October 2028

WHO WE ARE

We are Altrincham Preparatory School, a company registered in England and Wales (the "School"). Our company registration number is 00314852 and our registered office is at Marlborough Road, Bowdon, Altrincham, Cheshire WA14 2RR.

The School takes its responsibilities as a data controller seriously and is committed to using the personal data we hold in accordance with the law.

WHAT THIS PRIVACY NOTICE IS FOR

This Privacy Notice is intended to provide information about how the School will collect, use and hold (or "process") personal data about individuals including current, past and prospective pupils; and their parents, carers or guardians (referred to in this policy as "parents").

This makes the School a data controller of your personal information and this information is provided because data protection law gives individuals rights to understand how their data is processed and this Privacy Notice sets out how we will use that information and what your rights are in respect of the data we hold about you. Please note the School has a separate Data Protection Policy and Privacy Notice applicable to its employees and other staff.

This Privacy Notice applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Notice also applies in addition to the School's other relevant terms and conditions and policies, including

- any contract between the School and the parents of pupils;
- the School's policy on taking, storing and using images of children;
- the School's CCTV and/or biometrics policy;
- the School's retention of records policy;
- the School's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the School's IT policies, including its Acceptable Use policy, Social Media policy, eSafety/Online Safety policy and Bring Your Own Device policy.

RESPONSIBILITY FOR DATA PROTECTION

The School has appointed Mr N Vernon, Headmaster, as Data Protection Co-ordinator who will deal with all your requests and enquiries concerning the School's processing of your personal data (see section on "Your Rights" below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law. Mr Vernon can be contacted by telephone on 0161 928 3366 or by email on admin@altprep.co.uk.

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out our ordinary duties to staff, pupils and parents, the School needs to process a wide range of personal data about our community as part of our daily operations.

Some of this activity the School will need to carry out in order to fulfil our legal rights, duties or obligations – including where we have a legal obligation to share safeguarding information. Some processing will be necessary in order to fulfil our rights and obligations under a contract with our staff, or parents of our pupils.

Other uses of personal data will be made in accordance with the School's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

The School expects that the following uses will fall within that category of our (or our community's) "**legitimate interests**" (as recognised in law or determined by the School):

- For the purposes of pupil selection, to confirm the identity of prospective pupils and their parents, assess suitability for bursaries, and retain a record (if appropriate) for the purposes of future applications or openings;

- To carry out credit, identity and source of funds checks, whether with previous schools and/or third party sources or service providers, including for the purposes of verifying that parents are not subject to (or within the purview of) sanctions;
- To provide education services, (including musical education, physical training or spiritual development, career services, and extra-curricular activities to pupils), and monitoring pupils' progress and educational needs, including where such services are provided remotely (either temporarily or permanently);
- To report to and liaise with parents about their child's progress, welfare and development including by way of regular reports and parents' evenings;
- To organise and manage meetings, events and social engagements for pupils and parents;
- To maintain relationships with alumni and the School community, including direct marketing or fundraising activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past, prospective and current pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the School;
- To safeguard pupils' health and welfare and provide appropriate pastoral care (including following the requirements and recommendations of the government's guidance on Keeping Children Safe in Education;
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's Acceptable Use Policy;
- To make use of photographic images and video content of pupils in School publications, on the School website and (where appropriate) on the School's social media channels in accordance with the School's policy on taking, storing and using images of children;
- For security purposes, including CCTV in accordance with the School's CCTV policy;
- For the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities;
- For regulatory record keeping / compliance purposes in respect of immigration requirements, as an employer and/or visa sponsor;
- To carry out or cooperate with any School or external complaints, disciplinary or investigation process;
- To promote the School to prospective parents and pupils; and
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.

In addition, the School will on occasion need to process **special category personal data** (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on us by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons will include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of a pupil's, an individual's health / medical condition or other relevant information where it is in the pupil's, individual's interests to do so: for example for emergency medical care, to arrange the assessment and diagnosis of a pupil's health and medical conditions and special educational needs, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;
- To comply with public health requirements;
- To provide educational services in the context of making reasonable adjustments for a pupil's disability and/or any special educational needs of a pupil;
- As part of any School or external complaints, disciplinary or investigation process that involves such data, for example if there are SEND, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety and immigration / visa sponsorship compliance) and to comply with its legal obligations and duties of care.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;

- car details (about those who use our car parking facilities);
- bank details and other financial information, e.g. about parents (or others) who pay fees to the School, and any source of funds and/or anti-money laundering information we are required to collect by law;
- past, present and prospective pupils' academic, disciplinary, admissions, safeguarding and attendance records, and examination scripts and marks;
- nationality and other immigration status information (e.g. right to enter, live and work or study in the United Kingdom), including copies of passport information;
- information about pupils' health and medical conditions, special educational needs and family circumstances/living arrangements;
- contact details for next of kin;
- references given or received by the School about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- correspondence with and concerning pupils and parents (past and present); and
- images and video content of pupils (and occasionally other individuals) engaging in School activities, and images captured by the School's CCTV system (in accordance with the school's policy on taking, storing and using images of children);

HOW THE SCHOOL COLLECTS DATA

Generally, the School receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However, in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities, or third party service providers who credit and identity check parents and their source of funds); or collected from publicly available resources.

WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH

Processing by third parties: For the most part, personal data collected by the School will remain within the School, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). However, some functions are outsourced including payroll, accounting, IT. In accordance with Data Protection Law, this type of external data processing is always subject to contractual assurances that personal data will be kept securely and used only in accordance with the School's specific directions.

Data Sharing: Occasionally, the School - including its governing body - will need to share personal information relating to its community of pupils and parents with third parties, such as:

- appropriate contractors, such as visiting music teachers or external investigators and consultants;
- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- examination boards;
- stage 3 complaints panels, which may include independent panel members such as when a complaint is raised (and in accordance with the School Complaints Procedure, this requires the involvement of independent panel members);
- third parties and their advisers in the event of a possible or actual sale, merger or other restructuring of the School;
- government authorities (e.g. HMRC, DfE, CAFCASS, police, Home Office, a relevant public health/NHS body and/or the local authority) and/or appropriate regulatory bodies e.g. the Teaching Regulation Agency, Independent Schools Inspectorate;
- If you are a parent and a member of the APS Parents' Society ("Society"), the School may share your contact details with the Society. The Society is a separate data controller and the School is not responsible for the Society's processing of personal data.

ACCESS TO, AND SHARING OF, SENSITIVE DATA

Particularly strict rules of access apply in the context of "special category" data, most notably:

- Health and medical / special needs records; and
- pastoral or safeguarding files.

Medical/health data: The School needs to process such information to comply with statutory duties and to keep pupils and others safe, but the School will ensure only authorised staff can access information on a need-to-know basis. This may include wider dissemination if needed for School trips or for catering purposes. Express consent will be sought

where appropriate. However, a certain amount of any relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

Safeguarding data: The School is under duties imposed by law and statutory guidance (including **Keeping Children Safe in Education or 'KCSIE' and the Children Act 2004**) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity or where other statutory requirements are met. This is likely to include notes on personnel or safeguarding files, low-level concerns records kept about adults (which may include references to pupils or family members), and in some cases referrals to relevant authorities such as the LADO, Children's Service, CAMHS or the police.

The School is subject to a specific statutory duty to share information with certain organisations (including, but not limited to, local authorities, NHS Trusts, the police and other schools) where it is relevant to safeguarding and promoting a child's welfare. There is no threshold of risk or harm that needs to be met to trigger this duty and the only exception to it is in rare circumstances where sharing information would be more detrimental to the child than not sharing. Where the duty applies, confidential information can be shared without consent.

KCSIE also requires that, whenever a child leaves the School to join another school or college, his or her child protection file is promptly provided to the new organisation, along with any other information which the School's Designated Safeguarding Lead considers material to the ongoing care needs of any pupil. Where appropriate, the School will consult with parents as to how these needs are best served, but ultimately the decision as to what information is necessary to share with the new school or college is a safeguarding question that must be reserved to the School. The School will retain a copy of the child protection file in accordance with its retention policy for material related to safeguarding matters.

For further information about this, please view the School's Safeguarding and Child Protection Policy.

HOW LONG WE KEEP PERSONAL DATA

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary staff personnel files is 10 years following departure from the School and for pupil files until the child turns 25 years of age. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact Mr Vernon. However, please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The School will use the contact details of parents, alumni and other members of the School community to keep them updated about the activities of the School, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the School will also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the School community, such as the APS Society.
- Contact parents and alumni, including via the APS Society, by post and email in order to promote and raise funds for the School and, where appropriate, other worthy causes.

Should you wish to limit or object to any such use, or would like further information about them, please contact Mr Vernon in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the School is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

YOUR RIGHTS

You have the following rights:

- To obtain access to, and copies of, the personal data that we hold about you;
- To require us to correct the personal data we hold about you if it is incorrect;
- To require us (in certain circumstances) to erase your personal data;
- To request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- To object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. The School will endeavour to respond to any such requests as soon as is reasonably practicable and in any event within statutory time-limits (which is generally one month, but actually fulfilling more complex or multiple request, e.g. those involving third party information, may take 1-2 months longer).

DATA ACCURACY AND SECURITY

The School will endeavour to ensure that all personal data held in relation to an individual is as up-to-date and accurate as possible. Individuals must notify the School Office of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the School may need to process your data, of who you may contact if you disagree.

The School will 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.

THIS POLICY

The School will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

QUERIES AND COMPLAINTS

If you believe that the School has not complied with this Privacy Notice or acted otherwise than in accordance with Data Protection Law, you should email admin@altprep.co.uk with details of your complaint. The School will acknowledge your complaint within 30 days of receipt and will investigate and inform you of the outcome of your complaint without undue delay (keeping you informed of progress as necessary).

If you are not satisfied with the outcome of your complaint, or if you feel the School has not handled it appropriately, you have the right to complain to the Information Commissioner's Office (ICO).