



Consultancy@IAPS Privacy Notice

Owner: IAPS Data Officer

Version No: v1.2

Document Location

This document will be published online on the IAPS website. Paper copies are valid only on the day they are printed. The source document will be held by the IAPS data officer.

Purpose of this document

This document is to advise data subjects on the personal information that may be collected and held by Consultancy@IAPS.

This privacy notice deals with the overall privacy responsibilities of the organisation and includes, as annexes, notices for board members, office holders, consultants, service providers, staff and users of Consultancy@IAPS services. The relevant annex should be read by the appropriate data subject along with the overarching notice. The intention is that each privacy notice is used as a stand-alone document, introduced and covered by the overarching notice.

Document Version Control

<u>Version Number</u>	<u>Purpose/Change</u>	<u>Author</u>	<u>Date</u>
V1.0	Document published	IAPS data officer	February 2022
V1.1	Document format updated.	IAPS data officer	September 2022
V1.2	Updated Annex C	IAPS data officer	January 2023

This document is subject to annual review. Next review due by January 2024.

Distribution

This document should be provided to data subjects at the time their data is being obtained if it is being obtained directly.

Consultancy@IAPS Privacy Notice and annexes

Our contact details:

Name: Consultancy@IAPS (a wholly owned subsidiary of The Independent Association of Prep Schools)

Address: Bishop's House, Artemis Drive, Tachbrook Park, Warwick, CV34 6UD

E-mail: consultancy@iapsconsultancy.uk

Consultancy@IAPS (referred to as 'the organisation' or 'we' within this document) is registered with the Information Commissioner's Office (ICO).

The organisation is the controller for the personal data we process, unless otherwise stated. During the course of the organisation's activities, it collects, stores and processes personal data about staff, users of its services, consultants, suppliers and other third parties.

The organisation has appointed the Chief Executive as the data controller who will endeavour to ensure that all personal data is processed in compliance with this policy, the UK GDPR and the UK Data Protection Act 2018. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the data controller.

Everyone has rights regarding the way in which their personal data is handled. This privacy notice tells you what to expect us to do with your personal information when you contact us or use one of our membership services.

We'll tell you:

- why we are able to process your information
- what purpose we are processing it for
- how long we store it for
- whether there are other recipients of your personal information
- whether we intend to transfer it to another country, and
- whether we do automated decision-making or profiling.

Most of the personal data we process is provided to us directly by you for one of the following reasons:

- You are using or are seeking to use the services provided by the organisation. **(Reference: Annex A)**
- You are an employee of the organisation or applying for a position. **(Reference: Annex B)**

- You are a consultant providing services or applying to become a consultant providing services on behalf of the organisation. **(Reference: Annex C)**
- You are a director or office holder of the organisation. **(Reference: Annex D)**

We may also receive personal data indirectly for example in the following scenarios:

- Where references and emergency contact details are required.

Speculative personal data: if we receive an unsolicited CV at a time when we are not recruiting, we will delete the CV and inform the candidate of this.

Your data protection rights:

Under data protection law, you have rights including:

- You have the right to ask us for copies of your personal information.
- You have the right to withdraw your consent to data processing at any time. This will only apply to certain groups of data for which you have given consent.
- You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- You have the right to ask us to erase your personal information in certain circumstances.
- You have the right to object to processing of your personal data in certain circumstances.

You can complain at any time about how the organisation has handled your data. The Information Commissioner is available as follows: ICO helpline is 0303 123 1113.

Keeping your information safe and secure:

The organisation is committed to keeping its members and other users of its services' personal information secure to protect it from being inappropriately or accidentally accessed, used, shared or destroyed.

ANNEX A

Privacy Notice – Users of the services provided by the organisation

This annex should be read in conjunction with the introductory paragraphs in the covering document.

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

What type of information we have:

We may currently collect and process all and any of the following information:

- Name and contact information
- Identified gender
- Date of birth

For senior leader recruitment only:

- Current and previous employment details
- Spouse/civil partner role requirements (only where relevant to the recruitment)
- Children's age and gender (only where relevant to the recruitment)

The following special category data may be collected and processed where required for the services to be provided such as heads appraisals:

- Health including any medical condition, health and sickness records and work absence records other than for holidays

How we obtain the information, why we have it and what we do with the information we have:

The information we process is provided to us directly by you. Should we need data from other sources we will contact you within a month of obtaining the data.

Data will be processed for the purposes of responding to requests for information about services provided by Consultancy@IAPS and the organisation will therefore have a "legitimate interest" for processing basic personal data and, if necessary, sensitive personal data. The data the organisation holds will be the minimum it requires.

The organisation will share your name and contact information data with members of the organisation where there is a legitimate interest for them to be able to contact you regarding your request to use or usage of services provided by the organisation.

Where information on health is processed to fulfil the obligations for a specific service, this will be on the basis where processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the organisation or of the employee in the field of employment and social security and social protection law.

The organisation will share your data with the following service providers who have contracts with the organisation directly or under the agreement with IAPS (the parent company) which require them to meet the organisation's precautions and systems for dealing with data, these are:

- IT provider
- Consultants
- IAPS (the parent company of Consultancy@IAPS)

It is not normally necessary for data to be shared with other countries. In circumstances, where this may be required, your personal data will not be transferred unless the organisation has reviewed and considers that the country ensures an adequate level of protection for data subjects in relation to the processing of personal data.

There is no use of automated decision making or profiling in the processing of your personal data into and through the organisation.

How we store your information:

We will only retain users of the services' personal information for as long as is required to carry out a particular purpose or to meet a particular obligation. We have agreed and documented retention periods that we consider to be relevant and proportionate to the service we are providing. If you would like further information on our retention policy, please contact us, using the details at the front of this document.

Annex B

Privacy Notice – Employees of the organisation and those applying for positions

This annex should be read in conjunction with the introductory paragraphs in the covering document. It applies to staff employed directly by Consultancy@IAPS.

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

What type of information we have:

We may currently collect and process all and any of the following information:

- Name, photograph and contact information
- Employment and education history
- Bank account details, national insurance number, payroll records and tax status information
- date of birth, marital status and dependants
- Next of kin, emergency contact and death benefit nominee(s) information
- Salary, annual leave, pension and benefits information
- Copy of driving licence, passport
- Recruitment information (including copies of right to work documentation, references and other information included in a “CV” or cover letter or as part of the application process)
- Performance and appraisal information, sickness absences
- Biography

How we obtain the information, why we have it and what we do with the information we have:

We see the provision of personal data as necessary for our recruitment process and for the organisation to fulfil its obligations under the employment contract once you are an employee of Consultancy@IAPS.

We will obtain the data the organisation requires from you. Should we need data from other sources we will contact you within a month of obtaining the data.

Data will be processed for the purposes of meeting the organisation’s legal and contractual obligations and thus has a “legitimate interest” for processing basic personal data and sensitive personal data. The data the organisation holds will be the minimum it requires to form and maintain the contract between you and the organisation.

Where we process health data, this will be on the basis where processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the organisation or of the employee in the field of employment and social security and social protection law.

The organisation will share your data with the following service providers who have contracts with the organisation or under the agreement with IAPS (the parent company) which require them to meet the organisation's precautions and systems for dealing with data, these are:

- IT contractor
- Bankers
- Auditors
- Investment advisers
- Database providers
- Payroll bureau
- Pension provider
- Private medical insurers
- Permanent health insurers
- Death in service insurers
- HMRC
- ONS
- IAPS (the parent company of Consultancy@IAPS) – for finance and general support

Data such as name, contact details and biography will be shared with Consultancy@IAPS clients.

It is not normally necessary for data to be shared with other countries.

Consent will be requested for the use of employee photographs internally and externally to promote the organisation for example on the IAPS website.

There is no use of automated decision making or profiling in the processing of your personal data into and through the organisation.

How we store your information:

We will only retain employee personal information for as long as is required to carry out a particular purpose or to meet a particular obligation. We have agreed and documented retention periods that we consider to be relevant and proportionate to the service we are providing. If you would like further information on our retention policy, please contact us, using the details at the front of this document.

Annex C

Privacy Notice - consultant providing services or applying to become a consultant of the organisation.

This annex should be read in conjunction with the introductory paragraphs in the covering document.

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

What type of information we have:

We may currently collect and process all and any of the following information:

- Name, photograph, identified gender and contact information
- Employment and education history
- Bank account details, national insurance number for the purpose of fee payment
- References and other information included in a “CV” or cover letter or as part of the application process)
- Confirmation of required consultancy accreditation
- Confirmation of required DBS check
- Biography

How we obtain the information, why we have it and what we do with the information we have:

We will obtain the data the organisation requires from you. Should we need data from other sources we will contact you within a month of obtaining the data.

We see the provision of personal data as necessary to properly engage with you in enabling the provision of services that the organisation offers.

Data will be processed for the purposes of responding to requests for information about performing consultancy services on behalf of the organisation and the organisation will therefore have a “legitimate interest” for processing basic personal data and sensitive personal data. The data the organisation holds will be the minimum it requires to form and maintain the contract between you and the organisation.

Accreditation process: Where consultants are required to undertake accreditation via the University of Buckingham, their application form and two references will be shared with the University of Buckingham for the purpose of candidate assessment for accreditation.

The organisation will share your data with users of Consultancy@IAPS for provision of specific services and the following service providers who have contracts with the organisation or under the agreement with IAPS (the parent company) which require

them to meet the organisation's precautions and systems for dealing with data, these are:

- IT provider
- IAPS - accounts team for fee payment & payroll processing
- University of Buckingham – for accreditation

It may be necessary for us to share some personal data with service requesters in other countries outside of the United Kingdom, both within and outside of the EEA/EU, for example where IAPS overseas schools have requested services. This personal data is limited to information provided by you relating to your name and contact details to enable contact between the relevant parties.

There is no use of automated decision making or profiling in the processing of your personal data into and through the organisation.

How we store your information:

We will only retain consultants' personal information for as long as is required to carry out a particular purpose or to meet a particular obligation. We have agreed and documented retention periods that we consider to be relevant and proportionate to the service we are providing. If you would like further information on our retention policy, please contact us, using the details at the front of this document.

Annex D

Privacy Notice – directors

This annex should be read in conjunction with the introductory paragraphs in the covering document.

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

What type of information we have:

We may currently collect and process all and any of the following information:

- Name (and former name, if any) and contact information
- Date of birth and nationality
- Spouse/children (over 18) – names for auditors

We see the provision of personal data as necessary to safeguard you and the organisation as it will allow the necessary checks to be made.

How we obtain the information, why we have it and what we do with the information we have:

The information we process is provided to us directly by you. Should we need data from other sources we will contact you within a month of obtaining the data.

Personal data pertaining to the appointment of directors is processed on a legal requirements basis. The data the organisation holds will be the minimum it requires.

The organisation will share your name and contact information data with members of the organisation where there is a legitimate interest for them to be able to contact you as part of your role within IAPS.

The organisation will share your data with the following service providers who have contracts with the organisation or under the agreement with IAPS (the parent company) which require them to meet the organisation's precautions and systems for dealing with data, these are:

- IT provider
- Bankers and Finance providers
- Auditors
- Investment advisers
- Database providers
- Companies House
- HMRC
- Payroll Bureau
- Solicitors

The organisation will hold the data needed for the register of directors and the confidential register of residential addresses (residence during the period of the directorship) to fulfil the organisation's obligations under the Companies Act.

There is no use of automated decision making or profiling in the processing of your personal data into and through the organisation.

How we store your information:

We will only retain directors' personal information for as long as is required to carry out a particular purpose or to meet a particular obligation. We have agreed and documented retention periods that we consider to be relevant and proportionate to the service we are providing. If you would like further information on our retention policy, please contact us, using the details at the front of this document.