



# IAPS Privacy Notice

Owner: IAPS Data Officer

Version No: v2.2

## **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 IAPS.

This privacy notice deals with the overall privacy responsibilities of the association and includes, as annexes, notices for board members, office holders, members, staff and participants in IAPS events. 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**

<b><u>Version Number</u></b>	<b><u>Purpose/Change</u></b>	<b><u>Author</u></b>	<b><u>Date</u></b>
V1.0	Document published	IAPS Finance and Operations Director	April 2018
V2.0	Changes to overall policy layout and all annexes to align with ICO guidance. Added Annex F and G for itrust	IAPS Data Officer	April 2019
V2.1	Changed data controller, appendix G	IAPS Data Officer	July 2019
V2.2	Annual review. Changes made to the overview, Annexes A,B,C,D,E	IAPS Data Officer	August 2020

This document is subject to annual review. Next review due by August 2021

**Distribution**

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

## IAPS Privacy Notice and annexes

### **Our contact details:**

Name: IAPS (The Independent Association of Prep Schools)

Address: 11 Waterloo Place, Leamington Spa, CV32 5LA

Phone Number: +44 (0) 1926 887833

E-mail: [iaps@iaps.uk](mailto:iaps@iaps.uk)

IAPS (referred to as 'the association' within this document) is registered with the Information Commissioner's Office (ICO).

The association is the controller for the personal data we process, unless otherwise stated. During the course of the association's activities, it collects, stores and processes personal data about staff, members, course and sports events participants, suppliers and other third parties.

The association 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 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 or are seeking to become a council member (office holders), committee member or trust director/trustee. **(Reference: Annex A)**
- You are an employee of the association or applying for a position. **(Reference: Annex B)**

- You are a member or applying to become a member of the association. **(Reference: Annex C)**
- You are from a member school representing a child/children for IAPS events and competitions. **(Reference: Annex D)**
- You are participating in IAPS events, course and conferences. **(Reference: Annex E)**
- You are an itrust beneficiary (potential, current or previous) or a member of their families. **(Reference: Annex F)**
- You are a member of staff at a school, a company or professional body that IAPS need to contact for example receiving copyright licencing communications from the association (for members and non IAPS members). **(Reference: Annex G)**

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

- Where the event participant is a child and the details are provided by the member school on their behalf.
- For itrust beneficiaries, the application will be provided by the parents/guardian.
- Where references and emergency contact details are required.
- From members or other third parties advising of potential speakers/exhibitors for events.
- For copyright licence invoicing, from the CLA/MPLC/CCLI.

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 association has handled your data. A template letter, should you need it, is at appendix 1 to this notice. The Information Commissioner is available as follows:ICO helpline is 0303 123 1113.

**Keeping your information safe and secure:**

The association 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. We have been certified to Cyber Essentials since 2018 and Cyber Essentials Plus since 2019.

## **ANNEX A**

### **Privacy Notice IAPS – Council members (office holders), committee members and itrust directors/trustees**

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), photograph and contact information
- Date of birth and nationality
- Employment, education history (chairman and vice-chairman)
- Personal election statement (chairman, vice-chairman, international representative and itrust directors)
- Bank account details, national insurance number, payroll records and tax status information
- Copy of driving licence, passport

We see the provision of personal data as necessary to safeguard you and the association 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.

Data will be processed for the purposes of responding to requests for information about joining council, committees or the charity and the association will therefore have a “legitimate interest” for processing basic personal data and, if necessary, sensitive personal data. Personal data pertaining to the appointment of directors is processed on a legal requirements basis. The data the association holds will be the minimum it requires.

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

The association will share your data with the following service providers who have contracts with the association which require them to meet the association’s precautions and systems for dealing with data, these are:

- IT contractor
- Bankers

- Auditors
- Investment advisers
- Database providers
- Companies House
- HMRC
- Charity Commission

IAPS Directors: The association 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 association's obligations under the Companies Act.

It may be necessary for us to share some personal data with members in other countries outside of the United Kingdom, both within and outside of the EU; for example, as part of the election process for chairman, vice-chairman and the international representative. This personal data is limited to information provided by you relating to your name and personal election statement. This will be communicated to you as part of the application process.

There may be international trips that the association organises; should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it is required.

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

**How we store your information:**

The retention period for council members (office holders), committee members and itrust directors/trustees data will be in accordance with the association's data retention policy and / or be modified by any other legal obligations the association is subject to.



## **Annex B**

### **Privacy Notice IAPS – Employees of the association and those applying for positions and subject advisers**

This annex should be read in conjunction with the introductory paragraphs in the covering document. It applies to staff at IAPS HQ; subject advisers and helpline providers.

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
- Identified gender, 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

#### **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 association to fulfil its obligations under the employment contract once you are an employee of IAPS.

We will obtain the data the association 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 association’s legal and contractual obligations and thus has a “legitimate interest” for processing basic personal data and sensitive personal data. The data the association holds will be the minimum it requires to form and maintain the contract between you and the association.

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 association or of the employee in the field of employment and social security and social protection law.

The association will share your data with the following service providers who have contracts with the association which require them to meet the association'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

It is not normally necessary for data to be shared with other countries. The exception to this will be for overseas courses or events that the association organises; should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it be required.

Consent will be requested for the use of employee photographs internally and externally to promote the association 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 association.

**How we store your information:**

The retention period for employee data will be in accordance with the association's data retention policy and / or be modified by any other legal obligations the association is subject to.

## **Annex C**

### **Privacy Notice IAPS – Members of the association, or applying to join the association including retired and honorary members**

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
- References and other information included in a “CV” or cover letter or as part of the application process)

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

We will obtain the data the association 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 as member and to provide the services that the association offers.

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

The association will share your data with the following service providers who have contracts with the association which require them to meet the association’s precautions and systems for dealing with data, these are:

- IT contractor
- Database providers
- NAHT
- Newsletters via automated email service
- Online survey provider
- Independent school organisations
- DfE

The association will share your data with its other members including but not limited to the membership committee, regional groups and members. For retired and honorary members, your consent will be requested for your details to be included in the list of members which is published online to members only.

It may be necessary for us to share some personal data with members in other countries outside of the United Kingdom, both within and outside of the EU, for example as part of the mentoring process. This personal data is limited to information provided by you relating to your name and contact details to enable contact between a mentor and a mentee based outside of the United Kingdom. This will be communicated to you as part of the mentoring process.

It may be necessary for us to share some personal data with members in other countries outside of the United Kingdom, both within and outside of the EU in order for example with district, general or international representatives who are considered to have a legitimate interest to fulfil their elected responsibilities in representing members. This personal data is limited to your name and contact details.

NAHT – It is necessary for IAPS to hold confirmation of your NAHT membership where this is applicable/been opted for to enable annual invoicing for your NAHT membership. NAHT will be advised of your membership of the association if you have opted to have NAHT membership.

The association will have a legitimate interest for processing basic contact data in order to provide communications and updates relevant to your membership of the association which may include email tracking to improve members' experience.

There may be international trips that the association organises; should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it be required.

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

### **How we store your information:**

The retention period for membership data will be in accordance with the association's data retention policy and / or be modified by any other legal obligations the association finds itself under.

## **Annex D**

### **Privacy Notice IAPS – Children participating in IAPS events and competitions**

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, identified gender and contact information
- Date of birth
- Photographs taken at events and competitions
- Weight (where required for competitions)

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

We will obtain the data the association 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 provide the events and competitions without which the association would be unable to administer and run the events and competitions fairly and safely.

Data will be processed for the purposes of responding to requests to enter and the participate in IAPS sports events and other competitions including iArt and the association will therefore have a “legitimate interest” for processing basic personal data and sensitive personal data. The data the association holds will be the minimum it requires to allow the association to run these events fairly and safely and to meet any National Governing Bodies’ (NGB) regulations.

The association will share your data with the following service providers who have contracts with the association which require them to meet the association’s precautions and systems for dealing with data, these are:

- IT contractor
- Database providers
- Venues
- Officials and organisers
- iART competition art gallery
- SOCS Sport
- bsporthy

It is not normally necessary for data to be shared with other countries. The exceptions to this will be international events (usually only the ski championships) that the association organises and the iART competition (catalogue includes details for pupils placed in the competition)

Should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it be required.

Publication of results for sports events: For individual awards, competitors' details will be displayed online on our website and on the bsporty website (subscription required). For Team Awards, results are posted on the SOCS website as the school name and competitor details are not shown.

For some sports such as fencing, judo and tennis we use the National Governing Bodies online results provider where we are required to provide the full names for individual competitors for example for LTA rankings.

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

**How we store your information:**

The retention period for participants data will be in accordance with the association's data retention policy and / or be modified by any other legal obligations the association is subject to.

## **Annex E**

### **Privacy Notice IAPS – Adult participants/organisers of IAPS events, courses and conferences**

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
- Dietary, accommodation and access requirements
- Photographs (of event speakers)

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

We will obtain the data the association 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 provide the events, courses and conferences without which the association would be unable to administer and run the activity safely and effectively.

Data will be processed for the purposes of responding to requests for information relating to participation and organisation of events (including registering for a course or conference) and the association will therefore have a “legitimate interest” for processing basic personal data and sensitive personal data. The data the association holds will be the minimum it requires to form and maintain the contract between you and the association (including any event you are booked to attend). Where dietary and/or access requirement details are required, consent to provide this information will be completed as part of the booking process.

The association will share your data with the following service providers who have contracts with the association which require them to meet the association’s precautions and systems for dealing with data, these are:

- IT contractor
- Database providers
- Venues
- Other delegates
- Speakers
- Exhibitors/sponsors

Guests/officials  
SOCS sport  
Newsletters via automated email service  
Course and conferences app

It is not necessary for data to be shared with other countries. The exception to this will be for overseas courses or events that the association organises; should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it be required.

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

**How we store your information:**

The retention period for participants data will be in accordance with the association's data retention policy and / or be modified by any other legal obligations the association finds itself under.



## **Annex F**

### **Privacy Notice IAPS – itrust beneficiaries (potential, current and previous) and their families**

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
- Date of birth
- Employment details
- Financial statement
- Marital status

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

We will obtain the data the charity 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 process itrust applications without which the charity would be unable to administer and support the itrust charitable activities.

Data will be processed for the purposes of responding to applications for education support through itrust charitable activities and the charity will therefore have a “legitimate interest” for processing basic personal data and sensitive personal data. The data the association holds will be the minimum it requires to allow the charity to process these applications and to meet any Charity Commission rules.

The charity will share your data with the following service providers and third parties who have contracts with the charity, and which require them to meet the association’s precautions and systems for dealing with data, these are:

- IT contractor
- Database providers
- Bursary administration
- School to be attended

It is not necessary for data to be shared with other countries. The exception is where the itrust application is from an overseas school. Should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it be required.

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

**How we store your information:**

The retention period for data on itrust recipients is in accordance with the charity's data retention policy and / or be modified by any other legal obligations the charity is subject to.

## **Annex G**

### **Privacy Notice IAPS – Staff of schools, companies and professional bodies**

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. Where this information is not obtained directly from the data subject for example for copyright licencing, the details of where to find this privacy notice will be provided within the cover letter sent with the licencing communications.

#### **What type of information we have**

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

- Name and contact information

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

We will obtain the data the association requires from you directly, or from companies, professional associations and other bodies that we deal with for example we will obtain the data the association requires from the Copyright Licencing Agency who acquire the information from the Department for Education census or from the school where the Department for Education have not provided the contact details. 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 administer the association's responsibilities to its members, staff and other relevant parties for example the provision of personal data is necessary to fulfil our responsibilities relating to copyright licencing on behalf of the copyright management organisations. In this instance IAPS will be the data processor where data will be processed for the purposes of invoicing for copyright licences for all independent schools registered with the Department for Education, regardless of whether they are members of IAPS. IAPS acts as the billing agent for the Copyright Licensing Agency, the Motion Picture Licensing Company Ltd and Christian Copyright Licensing International.

For third parties, who are customers and/or suppliers of the association, we will collect and process the information necessary to maintain the relationship.

The association will therefore have a "legitimate interest" for processing basic personal data. The data the association holds will be the minimum it requires to fulfil this purpose.

The association will share your data with the following service providers who have contracts with the association which require them to meet the association's precautions and systems for dealing with data, these are:

- IT contractor / partners
- Database providers
- Copyright management organisations
- External auditors

It is not necessary for data to be shared with other countries. There is no use of automated decision making or profiling in the processing of your personal data into and through the association.

**How we store your information:**

The retention period for membership data will be in accordance with the association's data retention policy and / or be modified by any other legal obligations the association finds itself under.

## Appendix 1 – Template complaints letter

[Your full address]

[Phone number]

[The date]

IAPS

11 Waterloo Place

Leamington Spa

CV32 5LA

Dear Sir / name of the person you have been in contact with]

### **Information rights concern**

[Your full name and address and any other details such as account number to help identify you]

I am concerned that you have not handled my personal information properly.

[Give details of your concern, explaining clearly and simply what has happened and, where appropriate, the effect it has had on you.]

I understand that before reporting my concern to the Information Commissioner's Office (ICO) I should give you the chance to deal with it.

If, when I receive your response, I would still like to report my concern to the ICO, I will give them a copy of it to consider.

You can find guidance on your obligations under information rights legislation on the ICO's website ([www.ico.org.uk](http://www.ico.org.uk)) as well as information on their regulatory powers and the action they can take.

Please send a full response within 28 calendar days. If you cannot respond within that timescale, please tell me when you will be able to respond.

If there is anything you would like to discuss, please contact me on the following number [telephone number].

Yours sincerely,  
[Signature]