



Privacy Notice

Purpose of this *Privacy Notice*

In conducting our business, Italia Conti Associates is committed to safeguarding personal data and fully complying with Data Protection law. In the course of our activities it is necessary for us and our franchisees to collect, store and process personal data about our students, their parents/guardians/carers, suppliers, and other third parties. This *Privacy Notice* provides information on when and why we collect personal data, how we use it, and how we keep it secure.

Who collects and uses information.

Under Data Protection law, the people whose personal data we collect are called “Data Subjects”. This data is then collected and processed by “Data Controllers”. Such data may be collected by individual Italia Conti Associates’ franchised schools and some data may be shared with or processed by Italia Conti Associates Limited. Whilst individual schools may have their own ICO registration, for the purpose of this *Privacy Notice*, Italia Conti Associates are “Joint Controllers” of the data.

Why do we collect and use information?

We collect and use student information under section 537A of the Education Act 1996, and section 83 of the Children Act 1989. We also comply with Article 6(1)(e) and Article 9(2)(b) of the General Data Protection Regulation (GDPR).

Other information we may collect, we collect in accordance with the UK GDPR and Data Protection Act 2018 (“Data protection legislation”) and any replacement legislation which may come into effect. To use any personally identifiable information there must be a lawful basis to do this. The lawful bases are consent, contract, legal obligation, vital interest, public tasks and legitimate interest. In most cases the processing must also be necessary. The legal bases upon which we hold personal information includes consent, contract and legitimate interest. The specific legal basis will depend upon the reason or reasons why we collected and need to use the information.

We use data:

- to ensure only authorised person(s) can access our premises;
- to support student learning;
- to monitor and report on student progress;
- to provide appropriate pastoral care;
- to assess the quality of our services;
- to comply with the law regarding data sharing;
- for accounting, taxation and employment purposes;
- to meet our obligations under current English law.

The categories of information that we may collect, hold and share include:

- student’s personal details, e.g., name, date of birth, address and contact information, including details of parents/carers;
- parent’s/carer’s contact details, bank account or credit/debit card information, etc;
- characteristics, e.g., ethnicity, language, nationality;
- attendance (such as sessions attended, number of absences and absence reasons);
- assessment data;
- relevant special educational needs;
- relevant medical information;
- exclusions/behavioural;
- communications (including letters, emails, records of telephone calls, etc);
- CCTV records for security purposes (if applicable).

Collecting information

Whilst the majority of information provided to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain personal/student information to us or if you have a choice in this.

Marketing

We only use your personal information to administer your account and to provide you with information on the products and services you have requested from us. From time to time, we may also invite you to participate in surveys which help us to improve what we do. We will never share your information with third parties for marketing purposes.

Storing data

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information we consider:

- the amount, nature, sensitivity of the personal information;
- the potential risk of harm from unauthorised use or disclosure of your personal information;
- the purposes for which we process your personal information;
- whether we can achieve those purposes through other means, and the applicable legal requirements.

We undertake regular reviews of the data we hold and will safely dispose of any data that is no longer required.

Who do we share information with?

Organisations that we may share information with include:

- appropriate health authorities (such as our local Health Protection Team in the event of a notifiable disease);
- any awarding bodies for whom legitimate information needs to be passed on for the awarding of certificates (e.g., ISTD / RAD/ LAMDA);
- our local authority and their commissioned providers of local authority services;
- schools/colleges that the students may attend after leaving us;
- Italia Conti Associates Head Office.

Why we share information

We do not share information about our students with anyone without consent unless the law and our policies allow us to do so. We may share students' data with the Department for Education (DfE) on a statutory basis (if required).

Requesting access to your personal data

Under Data Protection legislation, parents/carers and/or students or other Data Subjects have the right to request access to their information which we hold. To make a request for personal information or, (including your child's report), please contact the Franchisee/Principal at your local Italia Conti Associates school.

Contact:

If you would like to discuss anything in this *Privacy Notice* or would like to see a copy of the *Privacy Notice* in the future, please contact the school office at your local Italia Conti Associates school. A copy of this *Privacy Notice* and the Italia Conti Associates' *Data Protection Policy* are available on our website.

Your rights

Please refer to section 10 of our *Data Protection Policy* for information on your legal rights and how these can be exercised; link at: <https://www.italiaconti.com/policies>

Although we will take reasonable steps to rectify or erase your information so far as required by Data Protection law, we are allowed to retain and continue processing your information under certain circumstances.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with the Data Protection Officer via the Franchisee/Principal of your Associate School.

Data Protection Officer (DPO)

All organisations that process personal data are required to have a Data Protection Officer (DPO). The DPO assists an organisation to monitor internal compliance, inform and advise on data protection obligations, and act as a contact point for data subjects and the Information Commissioner's Office (ICO) amongst other duties.

For any enquiries, please contact our overarching DPO for the Italia Conti Associates' Schools at dpo@italiaconti.co.uk

Information Commissioner's Registration

Every organisation or sole trader who processes personal information must be registered with the Information Commissioner's Office (ICO), unless they are exempt. Each organisation's details are recorded on the ICO's public register.

Each Italia Conti Associates school has a separate ICO registration.

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