



Alpha Inclusion & Communication

Privacy Notice

August 2022

We've created this policy, which covers how we collect, use, disclose, transfer and store your data.

1. INTRODUCTION

Alpha Inclusion Limited is a Limited Company and our company number is 09277655. The trading name of Alpha Inclusion Limited is 'Alpha Inclusion and Communication. We take our responsibilities as a data controller seriously and are committed to using the personal data we hold in accordance with the law.

This privacy notice provides detailed information about how we process personal data. Please read it carefully and, if you have questions regarding your personal data or its use, please contact the Administrator by email on info@alphainclusion.co.uk by telephone on 01603 926170; or, by post at Suite 9b, Keswick Hall, Keswick, Norwich, NR4 6TJ.

2. TYPES OF PERSONAL DATA WE PROCESS

We process personal data about prospective, current and past: pupils and their parents; staff, suppliers and contractors; and other individuals connected to or visiting Alpha Inclusion offices, hubs or The Block Bus.

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;
- courses, meetings or events attended.

As we provide services for schools and families, we need to process 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.

3. 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) or from the school we are working with. In some cases, we collect data from third parties (for example, referees, previous schools, the Disclosure and Barring Service, or other 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 Alpha Inclusion business, we share personal data with third parties such as other professionals working with the individual and relevant authorities (eg the Local Children Safeguarding Board, DBS). Some of our systems are provided by third parties, eg hosted databases, Alpha Inclusion websites, staff calendar, school post, mailshot companies or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions.

We do not otherwise share or sell personal data to other organisations for their own purposes.

4. PURPOSES FOR WHICH WE PROCESS PERSONAL DATA

We process personal data to support the Company's operation as an education and training services provider, and in particular for:

- The provision of educational, emotional and social skills support to children and young people, including the administration of the school curriculum and timetable; monitoring pupil progress and social, emotional and educational needs; reporting on the same internally and to parents; providing reports for school staff or for other professionals.
- The provision of individual and group sessions to children, young people and staff, both at the site of the school or business or at other locations, including The Block Bus.
- Training of staff at Alpha Inclusion premises or other sites.
- The safeguarding of children and young people's welfare and provision of pastoral care and welfare services by Alpha Inclusion staff.
- Operational management including the compilation of records; the administration of invoices, fees and accounts; management planning and forecasting; the administration and implementation of the rules and policies of the schools and organisations we work with; 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 Alpha Inclusion Services through its own websites, leaflets and other publications and communications (including through our social media channels); and

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

5. ADVERTISING AND KEEPING IN TOUCH

Advertising helps us to achieve our strategic objective of remaining independent. We send out information about upcoming training or events through third parties, such as Mailchimp. We do not sell this data to third parties for their own use.

We keep in touch with current or former clients, parents or other members of the Alpha Inclusion community . We will use your contact details to keep you updated about our activities and invite you to events of interest by email and by post. We ask you to let us know your data preferences so that we can ensure our communications are relevant to you. You can update your data preferences at any time using the link on our emails. Your data preferences will not affect our contact with you as a current client or parent.

6. HOW LONG WE KEEP PERSONAL DATA

We retain personal data only for a legitimate and lawful reason and only for so long as necessary or required by law. If you have any specific queries about our record retention periods, or wish to request that your personal data is considered for erasure, please contact the Office Team at info@alphainclusion.co.uk.

7. YOUR RIGHTS

You have various rights under Data Protection Law to access and understand the personal data we hold about you, and in some cases to ask for it to be erased or amended or for us to stop processing it, but subject to certain exemptions and limitations.

You always have the right to withdraw consent, where given, or otherwise object to receiving generic or advertising communications. Please be aware however that Alpha Inclusion may have another lawful reason to process the personal data in question even without your consent. That reason will usually have been asserted under this Privacy Notice, or may exist under some form of contract or agreement with the individual (e.g. an employment or contract).

If you would like to access or amend your personal data, or would like it to be transferred to another person or organisation, or have some other objection to how your personal data is used, please make your request in writing to the Administrator.



We will respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits, which is one month in the case of requests for access to information. We will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, we may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it.

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal privilege. We are also not required to disclose any confidential reference given by the Company for the purposes of the education, training or employment of any individual.

8. CHILDREN AND YOUNG PEOPLE DATA

The rights under Data Protection legislation belong to the individual to whom the data relates. However, we will often rely on parental consent to process personal data relating to pupils (if consent is required) unless, given the nature of the processing in question, and the pupil's age and understanding, it is more appropriate to rely on the pupil's consent.

Parents and guardians should be aware that Alpha Inclusion will ensure that the school we are working with has obtained consent for us to work with your child and provided you with information about how we process data.

In general, we will assume that young persons' consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare, unless, in the school's opinion, there is a good reason to do otherwise.

However, where a young person seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, we may be under an obligation to maintain confidentiality unless, in our opinion, there is a good reason to do otherwise; for example where Alpha Inclusion or school staff believes disclosure will be in the best interests of the young person or other pupils, or is required by law.

Young people can make subject access requests for their own personal data, provided that they have sufficient maturity to understand the request they are making. Young people are generally assumed to have this level of maturity at age 13. A person with parental responsibility will generally be entitled to make a subject access request on behalf of children and young people, but the information in question is always considered to be the child's at law. A child of any age may ask a parent or other representative to make a subject access request on their behalf. Moreover (if of sufficient maturity) their consent or authority may need to be sought by the parent making such a request.



9. CHANGE OF DETAILS

We try to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Please notify info@alphainclusion.co.uk of any significant changes to important information, such as contact details, held about you.

10. THIS POLICY

Our privacy notice should be read in conjunction with our other policies and terms and conditions which make reference to personal data, including our Safeguarding Policy, Health & Safety Policies and IT Policies.

We will update this Privacy Notice from time to time. Any substantial changes that affect how we process your personal data will be notified on our website and to you directly, as far as practicable.

If you believe that we have not complied with this policy or have acted otherwise than in accordance with Data Protection Law, you should notify the Administrator. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with us before involving them.