

This Privacy Notice is effective from 1 August 2021 and is applicable to all companies under Aspris Children's Services Limited.

We will update this Privacy Notice from time-to-time. When we do change the notice (in a significant way), we will post an update on our website.

Aspris takes data protection and confidentiality very seriously. This Privacy Notice covers:

- How we collect and use personal data
- What personal data we collect
- How we store your personal information
- Protection of your personal information
- How we use your personal information
- Disclosure to 3rd parties
- Accuracy and retention of personal information
- Access to personal information
- Additional rights

We collect personal data about our service users (patients, residents or students in our care) so please make sure that you read through this notice and get in touch if you have any questions.

Privacy questions

If you have any questions or concerns about this Privacy Notice or how we process your information, or if you would like to make a complaint about a possible data breach please contact us:

Email: DataProtection@aspris.com

Postal address:

Data Protection Officer
Aspris Children's Services Limited
The Forge
Church Street West
Woking
GU21 6HT

We take data security extremely seriously and all such communications are examined and replies issued where appropriate as soon as possible. If you are unsatisfied with the reply you receive, you may refer your complaint to the Information Commissioner's Office (ico.org.uk)

PRIVACY NOTICE FOR PATIENTS, RESIDENTS AND STUDENTS IN OUR CARE

1. Collection and use of young people personal data

You may be asked to provide your personal information anytime you are in contact with Aspris. Aspris and its affiliates may share this personal information with each other but will always use it in accordance with this Privacy Notice. We may also combine it with other information to provide and improve our services. You are not required to provide the personal information that we may request, but, if you chose not to do so, in many cases we will not be able to provide you with our services or respond to any queries you may have.

We understand the importance of taking extra precautions to protect the privacy and safety of the young people under our care. The young person information that we collect, hold and share may include:

- Personal information (such as name, unique pupil number and address)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)

Where the young person is also a patient or resident, we may also collect the following information:

- Physical and mental health information
- NHS number
- National Insurance number

We use the young person's information to comply with the law regarding data sharing for the following:

- To support pupil learning
- To monitor and report on pupil progress
- To provide appropriate pastoral care
- To assess the quality of our services

When you contact us, we may collect a variety of information, including your name, postal address, telephone number, email address, contact preferences or credit card information.

If our services are commissioned for the pupil by third parties (your GP, local authorities, clinical commissioning groups, private medical insurers etc.) they will provide us with a variety of information, including the young person's name, postal address, telephone number, email address and, medical/educational history.

During the course of the young person's time with us we will keep information about the young person in their personal records like their name, address and date of birth together with details of any care and/or treatment that they are having.

Whilst the majority of young person information provided to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the law, we will inform you whether you are required to provide certain young person information to us or if you have a choice in this.

2. How we store the personal information

The personal information we collect is stored in a variety of paper and electronic forms. Regardless, we have appropriate and adequate technical and administrative processes in place to make sure that all your information is kept secure.

3. Protection of the personal information

Aspris takes the security of the young person's and your personal information very seriously. To make sure the personal information is protected, we have a series of technical and administrative measures in place. Access is limited only to those of our employees who need to access it to provide services to the young person.

All members of staff are required to undertake data protection and confidentiality training every two years and our privacy and security guidelines are communicated to all Aspris employees. These privacy safeguards are monitored and strictly enforced. We send any information that we need to share with any third parties either as a legal requirement or through an anonymised process securely.

All data is stored on servers within data centres in the UK, although at times they may be temporarily outside the UK but within the EU

4. How we use the personal information

The personal information we collect and store about the young person allows us to provide services to them. We also use it to help us develop, operate, deliver, and improve the quality of the care we provide or, more generally, the type of services that we offer. From time to time, we may use the personal information to send important notices, such as updates to the young person's care and/or treatment plans or changes to our terms, conditions and policies. Because this information is important to the young person's and your interaction with Aspris, you may not opt out of receiving these communications.

We may also use personal information for internal purposes such as auditing, data analysis, and research to improve our services and our communication with you and the young person.

We may use the personal information to test our computer systems such as the software we use to store the young person's health, social, care and education records to improve our services. If you do not wish for the information to be used for these purposes, you can let us know.

If you don't want to be contacted by us after the young person is no longer using our services, you can opt out anytime by letting us know.

We will not sell, share or give information to third parties for marketing purposes.

Disclosure to third parties

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- local authorities
- the Department for Education (DfE)
- Ofsted

We share young people's data with the DfE on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

To find out more about the data collection requirements placed on us by the DfE (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

We do not share information about the young people in our care with anyone without consent unless the law and our internal policies allow us to do so. As such, we will only share personal information with other third parties in the following circumstances:

- Where you have given your consent to the information being shared
- Where there are issues or concerns like the health and safety of yourself, the young person or others
- Where there is a legal requirement or responsibility to share the information

Personal information of service users may also need to be shared with third parties to make arrangements for the funding and/or payment of services received.

Additionally, in the event of a reorganization, merger, or sale of Aspris or any part of it, we may transfer any and all personal information we collect to the relevant third party.

When might we transfer your personal information overseas?

We operate internationally, and some of the processes involved in our use of your personal information will require us to store or process your personal information in countries outside the country where you are located, including countries where the level of legal protection for personal information may be different and where you may have fewer legal rights in relation to it.

Whenever we transfer your personal information outside of a country or region, such as the UK or the EEA, we will make sure that we take steps necessary to comply with applicable legal requirements. Therefore, where required, we will ensure that appropriate safeguards are in place by using appropriate contractual mechanisms, such as the EU Standard Contractual Clauses.

Accuracy and retention of personal information

Aspris makes it easy for you to keep your and the young person's personal information accurate, complete, and up to date. If any information changes please let us know so that we can update our records.

We are legally required to hold certain information about you and the young person for a set period of time. All personal information will be deleted or securely destroyed at the appropriate time and we will not keep the personal information for longer than is required or permitted by law.

Access to personal information

Parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact us at the address outlined below.

We are not required to process any request for access which is frivolous or vexatious, jeopardize or otherwise affects the privacy of others, are impractical, or for which access is not otherwise required by law. We will let you know in writing if any of these circumstances apply to your request.

Additional rights

You may also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purposes of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed
- Data portability

If you believe you have any of these additional rights or you wish to exercise them, please let us know.

Privacy notice for ASPRIS COLLEAGUES

Employee Privacy Notice in respect of Aspris Children's Services Limited and all its subsidiaries ("Aspris")

This Privacy Notice is effective from 1 September 2021 and is applicable to all companies under Aspris Children's Services Limited.

We collect personal data about our colleagues so please make sure that you read this notice and get in touch if you have any questions.

We will update this Privacy Notice from time-to-time. When we do change the notice (in a significant way), we will post an update on our website.

Aspris takes data protection and confidentiality very seriously. This Privacy Notice covers:

- What is a Privacy Notice
- What information we will collect, store and use about you
- How we collect your personal information
- For what purpose we will use your personal information
- What happens if you fail to provide personal information
- How changes of purpose will be managed
- Why we might share your personal information with third parties
- What type of third party services providers' process your personal information
- How we may share your personal information with third parties
- How long we will use your information
- How we store your personal information
- Protection of your personal information
- Accuracy of personal information
- When might we transfer your information overseas
- Access to personal information
- Automated decisions
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- Privacy questions

If you have any questions or concerns about this Privacy Notice or how we process your information, or if you would like to make a complaint about a possible data breach please contact us:

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Aspris Children's Services Limited
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What is a Privacy Notice

Aspris is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you how we hold and use your personal information.

This notice applies to current and former employees, workers and contractors. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical. It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under data protection legislation.

What information will we collect, store and use about you

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, address, telephone numbers and personal email addresses
- Gender
- Date of birth
- Marital status and dependants
- Next of kin and emergency contact information
- National Insurance Number
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Records/results of any pre-employment checks (including credit and fraud checks)
- Start date and, if different, the date of your continuous employment
- Leaving data and your reason for leaving
- Location of employment or workplace
- Attendance records or timesheets

- Copy of passport and driving licence
- Employee personal relationships with anyone else working for the company
- 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)
- Employment records (including job titles, work history, working hours, holidays, training records and professional memberships)
- Employment and management records will include disciplinary and grievance records, flexible working requests, performance records, appraisals and training records, holiday and attendance records, terms and conditions of employment
- Compensation history
- Performance information
- Disciplinary and grievance information
- CCTV footage, audio CCTV recordings (in limited circumstances) and other information obtained through electronic means such as swipe card records
- Information about your use of our information and communications systems
- Photographs
- Results of HMRC employment status check, details of your interest in and connection with intermediary through which your services are supplied

We may also collect, store and use the following sensitive special categories of personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Information about your physical and mental health, including any medical condition, health and sickness records including:
 - Pre-employment medical screening tests
 - Information on vaccinations received
 - Where you leave employment and under any share plan operated by a group company the reason for leaving is determined to be ill-health, injury or disability, the records relating to that decision
 - Details of any absences (other than holidays) from work including time on statutory parental leave and sick leave
 - Any health information in relation to a claim made under a health insurance scheme; and

- Where you leave employment and the reason for leaving is related to your health, information about that condition needed for pension and health insurance purposes
- Genetic information (where applicable)
- Biometric records for the purposes of time recording attendance at sites; and
- Information about criminal convictions and offences

How we collect your personal information

We collect personal information about employees, worker and contractors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies such as immigration consultants, or the Disclosure and Barring Service.

We may also collect personal information from the trustees or managers of pension arrangements operated by a group company.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

For what purpose we will use your personal information

We will only use your personal information when the law allows us to. Mostly comply, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you
- Where we need to comply with a legal obligation
- Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests.).
- Where it is needed in the public interest or for official purposes.

The situations in which we will use your personal information include:

- Making a decision about your recruitment or appointment (for example CV, application form)
- Checking you are legally entitled to work in the UK
- Paying you and, if you are an employee or deemed an employee for tax purposes, deducting tax and national insurance contributions
- Providing the following benefits to you: salary, pensions, insurance and benefits administration (including pensions)

- Enrolling you in a pension arrangement in accordance with our statutory automatic enrolment duties
- Liaising with the trustees or managers of a pension arrangement operated by a group company, your pension provider and any other provider of employee benefits
- Administering the contract we have entered into with you
- HR, business management, planning purposes
- Making decisions about salary reviews or compensation
- Conducting inductions, appraisals or performance reviews, handling disciplinary and grievance matters, performance management, career planning, training, promotion, secondments, etc..
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accident at work
- managing disability, sickness or other types of leave, e.g. maternity leave, paternity leave
- Ascertaining your fitness to work
- To facilitate settling of expenses staff have incurred in the course of the business in accordance with their employment contracts
- To facilitate communications between employees and members within the business
- Internal record keeping purposes to enable us to maintain an audit trail in respect of approvals of decisions, voting and any internal surveys
- Managing and safeguarding our management, IT and communications systems
- Security reasons
- Complying with health and safety obligations
- To prevent fraud
- Performing workforce analysis, project management and planning
- Education, training and quality purposes
- Equal opportunities monitoring
- Legal reasons, e.g. complying with employment and health and safety obligations, ensuring you are legally entitled to work in the UK, establishing or defending legal claims, for record keeping purposes (including, without limitation to keep pension records or records for tax purposes), to defend our legal rights etc..
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution

- To test our computer systems to improve our services to you i.e. when there are changes to the National Minimum Wage or Living Wage. If you do not wish for your information to be used for these purposes, you can let us know

Some of the above grounds may overlap and there may be several grounds that justify our use of your information.

We process sensitive personal information for the following purposes:

- for security purposes and to assist with time recording at various premises by using biometric measurement data;
- managing sickness absence, providing reasonable adjustments in the workplace and administering benefits; and
- for legal reasons, e.g. to comply with employment and health and safety obligations.

We will use information about your gender or race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

What happens if you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with any legal obligations (such as to ensure the health and safety of our workers).

How changes of purpose will be managed

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will publish an updated Privacy Notice on our website.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Why we might share your personal information with third parties

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

What type of third party service providers' process your personal information

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group and their employees, representatives, strategic investors and their respective advisors.

Aspris engages these third parties to provide certain services to the business. In order for them to provide their services, we need to allow them to process personal data necessary for their

tasks. When we use third parties to process personal data on our behalf, we require them to commit to compliance with relevant data protection legislation.

The following activities are carried out by third-party service providers: payroll, pension administration, benefits provision and administration, IT services, management and data storage and intranet services, occupational health/other benefits.

How we may share your personal information with third parties

We may share your personal information with other third parties:

Sale or restructuring. We may need to share your personal information if a sale or restructuring of all or part of Aspris occurs. In this situation we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.

Request from a regulator or otherwise to comply with the law. We may also share your personal information: (i) with a regulator; (ii) to comply with the law; or (iii) in other circumstances when we are legally permitted to do so. This may include making returns to HMRC and disclosures to any other regulatory bodies which have authority over Aspris or its group, our professional advisers (such as lawyers, auditors, immigration advisors etc.), disclosures to stock exchange regulators, disclosures to shareholders such as directors' remuneration reporting requirements and to such third parties as we reasonably consider necessary in order to prevent crime.

If we are making an application to the Home Office or other government body on your behalf we may share your personal information with them as part of the application or investigations that arise in connection with immigration control. Data shared with the Secretary of State may subject to additional immigration exemptions.

How long will we use your information

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

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with our retention policy, applicable laws and regulations.

How we store your personal information

The personal information we collect is stored in a variety of paper and electronic forms. Regardless, we have appropriate and adequate technical and administrative processes in place to make sure that all your information is kept secure.

Protection of your personal information

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Data Protection team at dataprotection@aspris.com.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Accuracy of personal information

Aspris makes it easy for you to keep your personal information accurate, complete, and up to date. If any of your information changes please let us know so that we can update our records.

When might we transfer your information overseas

We will transfer the personal information we collect about you to countries within the European Economic Area. There are adequacy regulations in respect of these countries. This means that the countries to which we transfer your data are deemed to provide an adequate level of protection for your personal information.

We may transfer personal information we collect about you to the United States of America or other parts of the world outside the United Kingdom where there has not been an adequacy decision . This means that these countries are not deemed to provide an adequate level of protection for your personal information. We will transfer your personal data to those countries in limited circumstances that include when a third party supplier (such as IT software supplier) has operations (or provides IT software support for example) in such a country and can only deliver their service to Aspris by transferring your personal data to that country or because their IT infrastructure is structured in such a way that data is stored in those countries.

To ensure that your personal information does receive an adequate level of protection we put in place the following appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects UK law on data protection: data protection agreements, technical and organisational measures, standard contractual clauses and binding corporate rules (where applicable). If you require further information about this or these protective measures, you can request more information from the Data Protection team at dataprotection@aspris.com.

Access to personal information

You are entitled to see what personal information we hold about you at any time. This Privacy Notice outlines the information we hold about you and why. If you wish to access your personal information, please contact us at dataprotection@aspris.com.

We are not required to process any request for access which is frivolous or vexatious, jeopardizes or otherwise affects the privacy of others, are impractical, or for which access is not otherwise required by law. We will let you know in writing if any of these circumstances apply to your request.

Automated decisions

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Data portability

You may have a right to data portability under the UK GDPR (General Data Protection Regulation.)

The right to data portability allows you to obtain and reuse a copy of your personal data for:

- your own purposes; or
- for us to send the information to a new provider on your behalf (where technically feasible)

It allows you to move data, copy data and transfer data.

The right to data portability ensures that it is done in a safe and secure way without affecting its usability. However, it will only apply to information concerning you which you have provided to us and where it is held electronically (so does not include paper records).

This may include data such as:

- Username
- Email address
- Website or search usage history
- Traffic and location data

You can make a data portability request verbally or in writing when we are processing your information:

- By automated means and rely on your consent to use your personal data; or
- When we use your data as part of a contract you have with us.

We will ensure that we provide your information in a 'structured', 'commonly used' and 'machine-readable' format.

You can find further information on the Information Commissioner's Office website: <https://ico.org.uk/your-data-matters/your-right-to-data-portability/>

If you would like to make a data portability request please email dataprotection@aspris.com. Please note that as part of the process we may be required to verify your identity.

We will aim to respond to your request within a month but may respond within a further two months if the request is complex or we have received a number of requests from you.

Additional rights

You may also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purposes of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed
- Data portability

If you believe you have any of these additional rights and you wish to exercise them, please let us know.

Cookies

How we use cookies

This website uses cookies to improve its functionality and to monitor site performance.

Cookies are small text files which are placed on your computer by websites you visit. They are widely used in order to ensure websites work efficiently, alongside providing insight about the volume of visitors to the website and how visitors move around the website. This in turn helps us to develop the user experience.

The table below explains the cookies we collect and the information they store.

Cookie	Name	Purpose
Google Analytics	_ga _gid	These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they viewed. Click here to read Google's overview of privacy and safeguarding data
ResponseTap	AdiLP AdiS AdiV	These cookies enable the display of a dynamically generated phone number through ResponseTap call tracking software. This provides a better understanding of visitor interaction between the website from referral channel (e.g. Google search) to the point at which contact is made via phonecall. The cookies used by ResponseTap demonstrate the user

	AdiVi	<p>journey through the site and help improve online customer experience.</p> <p>Click here to read ResponseTap's cookie policy</p>
Pardot	visitor_id pi_opt_in visitor_id-hash lpv pardot	<p>These cookies collect information in an anonymous form to track visitor sessions and associated browsing actions. Pardot cookies don't store personally identifying information, only a unique identifier.</p> <p>Click here to read more about Pardot's cookie policy</p>

How to change your cookie settings

To find out more about cookies, including how to see what cookies have been set, visit www.aboutcookies.org or www.allaboutcookies.org.

To opt out of being tracked by Google Analytics across all websites visit <https://tools.google.com/dlpage/gaoptout>.

You can change the settings on your browser to prevent cookies being stored on your computer or mobile device without your explicit consent.

The following links detail how to manage cookies on popular web browsers:

- [Google Chrome](#)
- [Safari](#)
- [Microsoft Internet Explorer](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)

For information relating to other browsers, visit the browser developer's website, where the 'help' section will normally provide details on how to manage the cookie settings.

Social media

Contacting us through social media

We use third party providers, Hootsuite, Facebook Business Manager and Linked In Business Solutions, to help us manage our social media output and interactions.

If you send us a private message through social media, the message will be stored by Hootsuite for six weeks. Messages sent through our Facebook account will be stored by Facebook Business Manager for two weeks. Messages sent through Linked In will be stored in our Linked In Inbox for two weeks. Your messages will not be shared with any other organisations.

