



Cobras AP Ltd – Privacy Policy

Introduction

Cobras AP Ltd is committed to protecting the privacy and security of all personal information we hold. We collect and use personal data to deliver education, support services, and to fulfil our legal and safeguarding obligations. We handle all information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Purpose of This Policy

This Privacy Policy explains:

- What information we collect and why
- How we use and store it
- Who we share it with
- Your rights regarding your personal data

We aim to be open and transparent about how we manage information to build trust with pupils, parents, staff, and partners.

What Information We Collect

Cobras AP Ltd may collect and process the following types of personal information:

For Pupils

- Name, address, date of birth, and contact details
- Emergency contact information
- Educational history, attendance, and progress data
- Special educational needs (SEND), medical or health information
- Behaviour, safeguarding, and support records
- Photographs or videos (with consent)

For Staff and Contractors

- Name, contact details, qualifications, and employment history
- Payroll, tax, and bank details



- DBS check and safeguarding records
- Training, supervision, and appraisal information

For Parents, Carers, and Visitors

- Contact information
- Relationship to pupil
- Records of communication or meetings

Why We Collect Personal Data

Deliver education, wellbeing, and support services

Safeguard pupils and meet statutory requirements

Monitor attendance and academic progress

Communicate with parents, carers, and professionals

Manage staff employment and training

Fulfil health & safety and legal obligations

Promote achievements (with consent)

Lawful Basis for Processing

We process personal data under the following lawful bases set out in Article 6 of the UK GDPR:

- Public task: To perform a task in the public interest or under official authority
- Legal obligation: To comply with the law (e.g. safeguarding, education regulations)
- Contract: To meet contractual commitments with staff or partners
- Consent: For specific optional uses such as photography or marketing

For sensitive (special category) data, such as medical or SEND information, we rely on Article 9(2)(g) and (h) – reasons of substantial public interest and safeguarding.

How We Store Information

- All electronic data is stored securely on password-protected systems.
- Paper records are stored in locked cabinets within secure offices.
- Access is restricted to authorised staff only.
- Data is retained only as long as necessary and then securely deleted or shredded in line with our Data Retention Schedule.



Sharing Information

We may share personal data with trusted third parties such as:

- Local Authorities
- Commissioning Schools
- Social Care or Safeguarding Partners
- Exam Boards and Educational Platforms (e.g. ASDAN, TUTE)
- Regulatory bodies (e.g. Ofsted, HSE)
- Emergency services (where required)

We will only share information that is necessary and always in accordance with data protection law. We will not sell or share data with third parties for marketing purposes.

Photography and Media

Images will only be used for educational or promotional purposes with consent (see our Photographic Policy). Parents and pupils may withdraw consent at any time by contacting the Director or Data Protection Lead.

Your Data Rights

Under the UK GDPR, individuals have the right to:

- Be informed about how their data is used
- Access a copy of their personal data (Subject Access Request)
- Rectify inaccurate or incomplete data
- Erase data (the “right to be forgotten”)
- Restrict processing under certain circumstances
- Object to certain uses (e.g. marketing)
- Data portability (transfer data to another provider)

To exercise these rights, contact the Data Protection Lead using the details below.

Data Breaches

If a data breach occurs (loss, theft, or unauthorised access), Cobras AP Ltd will:

- Contain and investigate the incident immediately
- Notify affected individuals if there is a high risk of harm
- Report serious breaches to the Information Commissioner’s Office (ICO) within 72 hours

Roles and Responsibilities

- The Director is responsible for overall data protection compliance.
- The Data Protection Lead (DPL) oversees day-to-day implementation.
- All staff must complete training and handle data responsibly.



Data Protection Lead Contact

Name: Rachel Fox

Position: Data Protection Lead

Email: info@cobrasap.co.uk

Address: 44 High Street Bagshot, Surrey, GU19 5BA

Review and Monitoring

This policy will be reviewed annually or sooner if legislation or operational practice changes. All updates will be shared with staff, parents, and commissioning partners.

