

Woodlands Schools' Privacy Notice

Applicable to all members of the school community (past and present)

Welcome to Woodlands Schools Limited's (**WSL**) (collectively referred to as "WSL", "we", "us" or "our") Privacy Notice. We respect your privacy and we are committed to protecting your personal data and the personal data of the children that attend our schools.

This Privacy Notice aims to give you information on how WSL collects and processes personal data however it is provided to us, including information parents provide to us about pupils and by pupils directly, personal information our staff or through the use of this website or by any means.

It is important that you read this Privacy Notice together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Notice supplements other notices and privacy policies and is not intended to override them. In particular we refer you to the following:

- WSL's employee privacy notice;
- WSL's policy on taking, storing and using images of children;
- WSL's CCTV policy;
- WSL's retention of records policy;
- WSL's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- WSL's IT policies, including our Acceptable Use and eSafety policies.

WHO WE ARE

WSL is a company registered in England and Wales. Our company registration number is 1389757 and our registered office is at 428 Rayleigh Road, Hutton, Brentwood, Essex CM13 1SD. We are the controller and responsible for your personal data and the personal data of pupils attending our school.

WSL operates two independent preparatory schools: the Hutton Manor School, at 428 Rayleigh Road, Hutton, Brentwood, Essex CM13 1SD; and Great Warley School, Warley Street, Great Warley, Brentwood, Essex CM13 3LA. Each of these Schools operate nurseries known as Little Acorns.

WSL established Woodlands Schools Enterprises (WSE) (company registration number 06441441) to sell school uniforms. This Privacy Notice deals with how WSL and WSE process personal data; however, a further privacy notice may be issued specifically for WSE if we consider necessary.

WHAT THIS PRIVACY NOTICE IS FOR

This policy is intended to provide information about how WSL will use (or "process") personal data about individuals including: our staff; our current, past and prospective pupils; and their parents, carers or guardians (referred to in this policy as "parents"), suppliers, contractors, visitors to our schools, visitors to our website and all others who provide us with their personal information.

This information is provided so individuals understand how their data is used. Staff, parents and pupils are all encouraged to read this Privacy Notice and understand WSL's obligations to its entire community.

RESPONSIBILITY FOR DATA PROTECTION

WSL has appointed Mrs Cheralyn Beeston, one of the Company's Directors, as Privacy and Compliance Officer, who will deal with all your requests and enquiries concerning the Schools' uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law.

WHY WSL NEEDS TO PROCESS PERSONAL DATA

In order to carry out our ordinary duties to staff, pupils and parents, we need to process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of its daily operation.

We will need to carry out some of this activity in order to fulfil WSL's legal rights, duties or obligations – including those under a contract with our staff, or parents of our pupils.

Other uses of personal data may be made in accordance with WSL's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

WSL expects that the following uses will fall within that category of its (or its community's) "**legitimate interests**":

- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents);
- To provide education services and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with alumni and the school community, including direct marketing or fundraising activity;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- To enable relevant authorities to monitor the Schools' performances and to intervene or assist with incidents as appropriate;

- To give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To enable pupils to take part in national or other assessments, and to publish the results of achievements of pupils of the Schools;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's 'IT: Acceptable Use Policy';
- To make use of photographic images of pupils in school publications, on the Schools websites and (where appropriate) on the Schools' social media channels in accordance with WSL's policy on taking, storing and using images of children;
- For security purposes, including CCTV, in accordance with WSL's CCTV policy;
- To keep in touch with you;
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the Schools' purposes, including to obtain appropriate professional advice and insurance for the Company.

In addition, WSL will on occasion need to process **special category personal data** (concerning health, ethnicity, religion or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on us by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons will include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;
- To provide educational services in the context of any special educational needs of a pupil;
- In connection with employment of its staff, for example DBS checks, welfare, or pension plans;
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

Where we are processing personal data that has been collected when you visit our website we will collect:

- Technical data which may include internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Usage data which may include information about how you use our website.

- Profile data which may include your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

TYPES OF PERSONAL DATA PROCESSED BY WSL

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- bank details and other financial information, e.g. about parents who pay fees to us;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- personnel files, including in connection with academics, employment or safeguarding;
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- references given or received by WSL about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- correspondence with and concerning staff, pupils and parents past and present;
- for WSE purchase details of items purchased from the shop or events planned by WSE;
- images of pupils (and occasionally other individuals) engaging in school activities, and images captured by the Schools' CCTV systems (in accordance with WSL's policy on taking, storing and using images of children); and
- Special Categories of Personal Data which may include details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership and information about health.

HOW WSL COLLECTS DATA

Generally, WSL receives personal data from you directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However, in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities working with that individual).

WHO HAS ACCESS TO PERSONAL DATA AND WHO WSL SHARES IT WITH

Occasionally, the school will need to share personal information relating to its community with third parties, such as:

- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- government authorities (e.g. HMRC, DfE, police or the local authority); and

- appropriate regulatory bodies e.g. NCTL, the Independent Schools Inspectorate, the Independent Schools Association or the Information Commissioner.

WSL has a special relationship with the Friends of Woodlands Schools, an organisation established to organise activities and events for pupils in order to enrich the educational experience offered by WSL and therefore WSL may sometimes share personal information with the Friends of Woodlands Schools.

For the most part, personal data collected by WSL will remain within WSL, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records;
- Special Categories of Personal Data; and
- pastoral or safeguarding files.

However, a certain amount of any SEN pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

Staff, pupils and parents are reminded that WSL is under duties imposed by law and statutory guidance (including 'Keeping Children Safe in Education') to record or report incidents and concerns that arise or are reported to it to the relevant government authorities such as LADO or the police. In some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals. For further information about this, please view WSL's Safeguarding Policy.

As some of our systems are provided by third parties some of WSL's processing activity is carried out by these third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the school's specific directions.

TRANSFER OF PERSONAL DATA OUTSIDE OF THE EUROPEAN ECONOMIC AREA (EEA)

We do not transfer personal data outside of the EEA. If we do wish to transfer your personal data out of the EEA, we ensure an adequate degree of protection is afforded.

HOW LONG WE KEEP PERSONAL DATA

WSL will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Details are set out in our Record Retention.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

KEEPING IN TOUCH AND SUPPORTING WSL

- WSL will use the contact details of parents, alumni and other members of the school community to keep them updated about the activities of the Schools, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. WSL will: Contact parents and/or alumni (including via the Friends of Woodlands Schools) by post and email in order to promote the Schools and, where appropriate, to raise funds for worthy causes supported by the Schools.

Should you wish to limit or object to any such use, or would like further information about them, please contact the Headteacher of the relevant School or Mrs Cheralyn Beeston.

We may also request your consent to share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the school community, such as the Friends of Woodlands Schools.

YOUR RIGHTS

Individuals, or in some cases parents of pupils, have various rights (subject to certain exemptions and limitations) under Data Protection Law to access and understand personal data about them or their children, held by WSL including:

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.**
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.
- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in certain circumstances.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.
- **Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

Any individual wishing to exercise one of the rights above should put their request in writing to Mrs Cheralyn Beeston c/o the Headteacher of the relevant School.

WSL will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within one month.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

- Pupil requests

Pupils may be entitled to make subject access requests for their own personal data, provided that, in the reasonable opinion of the School, they have sufficient maturity to understand the request they are making (see section **Whose Rights?** below). A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, the law still considers the information in question to be the child's: Preparatory School children may be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

- Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates. However, WSL will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils – for example, under the 'parent contract', or via a form.

Where consent is required, it may in some cases be necessary or appropriate – given the nature of the processing in question, and the pupil's age and understanding – to seek the pupil's consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

In general, WSL will assume that pupils' 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. That is unless, in WSL's opinion, there is a good reason to do otherwise.

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

THIS POLICY

WSL will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to Mrs Cheralyn Beeston by writing to her c/o the Headteacher of the relevant School.

If an individual believes that WSL has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the school complaints/grievance procedure and should also notify the Bursar. 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 the school before involving the regulator.

16th April 2019

For and on behalf of the Directors of Woodlands School Limited