

**ENCLOSURE TO
DATA PROTECTION POLICY**

**BISHOP WORDSWORTH'S SCHOOL
PRIVACY NOTICE**

1. **The Law.** Bishop Wordsworth's School (the School) is required by the Data Protection Act as clarified by the General Data Protection Regulations (GDPR) to inform individuals how information ('data') that they supply on registration forms, application forms or by any other means is used and processed. Students have the same rights as parents once they are old enough to understand their rights over their own data (generally considered to be age 12). This Notice covers all categories of individuals for which the School collects data:

- Applicants for enrolment, enrolled students and their parents.
- Candidates for examination and their parents.
- Employees and applicants for employment.
- Governors.
- Students, applicants and their parents (if the student or applicant is a minor) for external courses such as the 11+ Familiarisation Classes and Adult Language Courses.

2. **Definition of Parent.** "Parent(s)" has the natural meaning and also refers also to guardian(s) or any person who has parental responsibility for a student or with whom the student lives e.g. a foster carer.

3. **Types Personal Data Collected.**

a. **Applicants for Enrolment, Enrolled Students and Their Parents.** The student data initially collected is that requested on the enrolment form i.e. basic personal details, parental contacts, eligibility for pupil premium, travel arrangements, photography permission, special educational needs, medical conditions or other personal issues, ethnicity and religion. During the time that an individual is a student is at the School, we also collect information on attendance, curricular and extra-curricular outcomes, payments for extra-curricular activities and other purchases, safeguarding, any support provided, photographs and by CCTV images.

b. **Candidates for Examination and Their Parents.** The candidate data collected is that requested on the application form i.e. details of parental contacts, eligibility for pupil premium, travel arrangements, any special educational needs, medical conditions or personal issues, ethnicity and religion. During the process we will collect information on examination outcomes and appeals information.

c. **Employees and Applicants for Employment.** The staff data initially collected is that requested on the application form and supplemented by further information offered and collected during the interview process. On appointment, personal data that is held includes but is not restricted to:

- Contact details.
- Date of birth, marital status and gender.
- Next of kin and emergency contact numbers.
- Salary, annual leave, pension and benefits information.
- Bank account details, payroll records, National Insurance number and tax status information.

- 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.
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships.
- Prohibition from teaching check, EEA teaching sanction check and Prohibition from Management check (If applicable).
- Children's Barred List check and Enhanced DBS check.
- Performance information.
- Outcomes of any disciplinary and/or grievance procedures.
- Absence data.
- Copy of driving licence.
- Photographs.
- CCTV footage.
- Data about usage of the school's information and communications systems.

We may also collect, store and use information that falls into "special categories" of more sensitive personal data. This includes information about:

- Ethnic Origin, disability and if another relies on you to provide care.
- Health, including any medical conditions, and sickness records.

d. **Governors.** Governors' data collected consists of:

- Contact details.
- Date of birth, marital status and gender.
- Class of governor.
- Business/employer name, address, activity.
- Any conflicts of interest.
- That there is no disqualification from being a director.
- That an enhanced DBS check is current.
- Previous business interests, hobbies sports as declared for CV.
- Photograph as provided for CV.
- We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data: in particular information about disability.

e. **Students, Applicants and Parents for External Courses.** The data collected for external courses is that requested on the application form and subsequent payment history.

4. Reason for Holding Personal Data.

a. **Applicants for Enrolment, Enrolled Students and Their Parents.** Data is collected and processed to provide data for the Statutory School Census and National Pupil Database, support pupil learning, monitor and report on pupil progress, provide appropriate pastoral care, protect pupil welfare, assess the quality of our services, carry out research and to comply with the law regarding data sharing.

b. **Candidates for Examination and Their Parents.** Registration data is collected and processed in order that the School may comply with the Department of Education School Admissions' Code. The data collected includes information used to determine an applicant's priority for a place when there are more eligible applicants than places and also includes details of any special educational needs, medical conditions or personal difficulties in order that the School can determine

whether an applicant boy qualifies for concessions. Details of an applicant's current or previous school is required in some instances for administration of the 11+ Examination or for requesting actual or predicted grades in the case of Sixth Form entry.

c. **Employees and Applicants for Employment.** The purpose of processing staff and potential staff data is to:

- (1) Support the selection process.
- (2) Facilitate safe recruitment, as part of the School's safeguarding obligations.
- (3) Enable staff to be paid.
- (4) Support effective performance management.
- (5) Inform our recruitment and retention policies.
- (6) Allow better financial modelling and planning.
- (7) Enable ethnicity and disability monitoring.
- (8) Improve the management of workforce data across the sector.
- (9) Support the work of the School Teachers' Pay Review Body.

d. **Governors.** The purpose of processing this data is mainly to comply with Company, Charity and Education Law and also to:

- (1) Facilitate safe recruitment, as part of our safeguarding obligations.
- (2) Provide parents and other stakeholders with information about governors.
- (3) Support effective governance.
- (4) Make adjustments for any disabled governors.
- (5) Pay any expenses.

e. **Students, Applicants and Parents for External Courses.** Data is collected and processed to contact those who apply for and join classes, support learning, provide appropriate pastoral care, protect welfare, to assess the quality of our services and to comply with the law regarding data sharing.

5. **Legal Basis and Purpose for Processing.** We collect and use data only when allowed by law. Some of the bases listed below overlap and there may be several grounds which justify our use of personal data.

a. Most commonly, we process it where we need to:

- (1) Comply with a legal or contractual obligation including education legislation.
- (2) Process the data for the legitimate interests of the School or a third party (provided the individual's rights and freedoms are not overridden).
- (3) Perform an official task in the public interest.

b. Less commonly, we may also process pupils' personal data in situations where:

- (1) We have obtained consent to use it in a certain way.

(2) We need to protect the individual's vital interests (or someone else's interests).

6. **Data Retention.** Data is retained according to the requirements of the purpose for which it was collected. Full details are in an Annex of the Data Protection Policy, which is available on the School's website. Thereafter, data is anonymised (i.e. all personal details removed that could identify the individual) so that it can be retained for statistical purposes.

7. **Data Sharing.** The School does not share personal data with any third parties without consent unless the law and our policies allow us to do so. Any data processor with which we share is required by us to comply with all of the requirements of the Data Protection Act and of the GDPR.

a. **Applicants for Enrolment, Enrolled Students and Their Parents.**

Information will be shared with the student's parents, suppliers and service providers and with other agencies as required, e.g. a school that a pupil attends after leaving this School, the Department for Education (DfE), the Local Authority and, by request, the Police. We are required by statute to share pupils' data with the DfE. This data sharing underpins school funding and educational attainment policy and monitoring.

b. **Candidates for Examination and Their Parents.** Registration information will be shared with other data processors, test providers and admission authorities in order to safeguard the integrity of the testing process and the tests themselves.

c. **Employees and Applicants for Employment.** Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- (1) Our local authority: to meet our legal obligations to share certain information with it, such as for safeguarding.
- (2) The Department for Education for any adverse capability proceedings.
- (3) Suppliers and service providers to enable them to provide the service we have contracted them for, such as payroll, pensions.
- (4) Our auditors for scrutiny of staff remuneration.
- (5) Trade unions and associations as authorised by you for example for employment tribunals.
- (6) Health authorities: for occupational health assessments if authorised by you.
- (7) Police forces, courts, tribunals: as required by law.

d. **Governors.** Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- (1) The Department for Education, Company's House, the Charity Commission and our auditors as required by statute.
- (2) Our local authority and the Salisbury Diocese Board of Education.
- (3) Police forces, courts, tribunals etc: as required by law.

e. **Students, Applicants and Parents for External Courses.** Information will not be shared externally to the School. However, we may contact you again, unless you request us not to, in order to inform you about similar courses.

8. **Right to Access, Rectify or Erase.** All individuals have the right to access (by subject access request), have rectified or erased any of the personal data held (but not erased where the Law requires us to retain it) and ask why we are holding or processing the data, for how long we will keep it, from where we obtained it (if not from them) and with whom it has been or will be shared.
9. **Other Rights.** All individuals have certain rights regarding how their personal data is used and kept safe, including the right to:
- a. Object to the use of personal data if it would cause, or is causing, damage or distress.
 - b. Prevent it being used to send direct marketing.
 - c. Claim compensation for damages caused by a breach of data protection regulations
10. **Identities.** The Data Controller is the School and the Data Protection Officer is the School's Bursar.
11. **Queries.** Any queries about this notice should be made to the Data Protection Officer.
12. **Complaints.** Parents and pupils may complain about the School's use of data to the Data Protection Officer and, if not satisfied, to the Information Commissioner's Office at ico.org.uk/concerns.

13 August 2021