

For this we stand:
to search for truth;
to live in love;
to grow together.



"Speaking the truth in love, we will grow to become in every respect the mature body of him who is the head, that is Jesus Christ"

Ephesians 4

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 2018, as clarified by the UK General Data Protection Regulations (UK GDPR) to inform individuals how information ('personal 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).

Under UK GDPR, children are entitled to the same data protection rights as adults. Where appropriate, information will be provided directly to pupils in clear and age-appropriate language.

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.
- Alumni and other supporters.

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 are 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 are 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 are 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 consist 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 are that requested on the application form and subsequent payment history.

f. **Alumni and Other Supporters.** The data collected are purely those provided voluntarily by the individual or those that are publicly available (e.g. from LinkedIn, Companies House, Charity Commission, Who's Who, articles in publications etc).

4. **Reason for Holding Personal Data.**

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

f. **Alumni and Other Supporters.** Data are collected to help the School understand more about individuals so that conversations about fundraising, volunteering and other support are appropriately informed and to ensure that the School provides a relevant experience for the supporter.

In all cases, personal data is only processed where it is necessary, proportionate and relevant to the purpose for which it was collected

5. **Legal Basis and Purpose for Processing.**

The School processes personal data only where permitted by law, and in ways that are necessary, proportionate and relevant to the purpose for which the data was collected

5.1 Lawful Bases for Processing

The School generally relies on the following lawful bases under Article 6 UK GDPR, consistent with the School's Data Protection Policy (section 22):

- (1) Public task – for processing pupil data in order to provide education, safeguarding, assessment, and statutory reporting.
- (2) Legal obligation – for compliance with employment law, education law, safeguarding, health and safety, and financial regulations.
- (3) Contract – for staff employment, external courses, and certain services provided by the School.
- (4) Legitimate interests – for activities such as governance, alumni relations, CCTV, and internal administration, where these interests are not overridden by individual rights.
- (5) Consent – where required, for example for certain uses of photographs, marketing communications, or optional activities. Consent may be withdrawn at any time.

Where special category data is processed, the school relies on additional lawful conditions under Article 9 UK GDPR, including substantial public interest, safeguarding, employment obligations, and health or social care purposes.

6. **Data Retention.**

The School retains personal data only for as long as necessary to fulfil the purpose for which it was collected and to meet statutory, regulatory or operational requirements.

Retention periods are determined by the School's Data Protection Policy and its Retention Schedule, which sets out retention rules for all categories of data held

by the School. These retention rules are maintained by the School to ensure compliance with the UK GDPR and the Data Protection Act 2018.

After the relevant retention period expires, data is securely deleted or anonymised so it can no longer identify an individual.

7. **Data Sharing.**

The School does not share personal data with third parties unless the law or our policies allow us to do so. Any organisation that processes data on our behalf must comply with UK GDPR and the Data Protection Act 2018.

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.
- f. **Alumni and Other Supporters.** Data may be shared with affiliated organisations whose objectives are to establish and maintain relationships with the School community, such as the BWS Network and the BWS Foundation.

Where the School uses third-party IT systems—such as safeguarding platforms, payroll systems, or management information systems—the data remains confidential to Bishop Wordsworth’s School. These organisations act strictly as data processors.

- The School has data processing and confidentiality agreements in place.
- Third parties may only access data to perform specific contracted tasks (e.g., payroll processing).
- They are not permitted to view, use, or disclose personal data for any other purpose.
- System-level access does not give the provider rights to use School data.

The school does not routinely transfer personal data outside the UK. Where any international transfer is required, appropriate safeguards (such as adequacy regulations or standard contractual clauses) will be applied

8. **Right to Access, Rectify or Erase.** All individuals have the right to access, have rectified or erased personal data held about them (subject to legal retention requirements) and ask why data is being processed, how long it will be kept, where it was obtained from and with whom it is shared.

Requests to exercise these rights can be made to the Data Protection Officer and will normally be responded to within one calendar month.

9. **Other Rights.** All individuals also have right to:
 - a. Object to the use of personal data if it would cause, damage or distress.
 - b. Prevent data being used for direct marketing.
 - c. Claim compensation for damages caused by a breach of data protection law.

10. **Identities.** The Data Controller is the School and the Data Protection Officer (DPO) is the School’s Bursar.

Contact details for the Data Protection Officer, including email and postal address, are published on the School’s website

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.