



Policy Title: Privacy Policy	Reviewed: Oct 26
School Section: Whole School	Reviewer: VLB
Audience: Whole School	Revision: 1.7

PRIVACY NOTICE

1. WHO WE ARE

Woodhouse Grove School is an independent co-educational day and boarding school for pupils aged 2 to 18. Pupils aged 2 to 11 attend Brontë House School, the preparatory school within Woodhouse Grove School.

Woodhouse Grove School forms part of the Methodist Independent Schools Trust (MIST).

For the purposes of UK data protection legislation, Woodhouse Grove School is the **Data Controller** responsible for the personal data it holds and processes.

Contact Details

If you have any questions regarding this Privacy Notice or the School's use of personal data, please contact:

Data Protection Lead

Woodhouse Grove School
Apperley Bridge
Bradford
BD10 0NR

Email: data@woodhousegrove.co.uk

2. PURPOSE OF THIS PRIVACY NOTICE

This Privacy Notice explains how Woodhouse Grove School collects, uses, stores and shares personal information relating to:

- current, past and prospective pupils;
- parents, guardians and carers;
- current, former and prospective staff;
- volunteers;
- governors;
- alumni;
- contractors and suppliers; and
- private candidates.

This Privacy Notice should be read alongside other School policies and documents, including:

- Parent Contract;
- Staff Contracts of Employment;
- Data Retention Policy;
- Safeguarding and Child Protection Policy;
- CCTV Policy;
- Information Security Policy;
- Data Breach Procedure;
- IT Acceptable Use Policies; and



Policy Title: Privacy Policy	Reviewed: Oct 26
School Section: Whole School	Reviewer: VLB
Audience: Whole School	Revision: 1.7

- Records Management Procedures.

3. DATA PROTECTION LEGISLATION

This Privacy Notice is prepared in accordance with:

- UK General Data Protection Regulation (UK GDPR);
- Data Protection Act 2018;
- Privacy and Electronic Communications Regulations (PECR); and
- any other applicable data protection legislation.

4. THE PERSONAL DATA WE COLLECT

The School may collect and process personal data including:

Identity Information

- name;
- date of birth;
- nationality;
- passport information;
- photographs; and
- identification documents.

Contact Information

- home address;
- email address;
- telephone numbers;
- emergency contact details.

Financial Information

- bank account details;
- fee payment records;
- bursary information; and
- financial assistance applications.

Educational Information

- admissions records;
- academic progress;
- assessment and examination results;
- attendance records;
- references;
- learning support information; and
- disciplinary records.



Policy Title: Privacy Policy	Reviewed: Oct 26
School Section: Whole School	Reviewer: VLB
Audience: Whole School	Revision: 1.7

Employment Information

- recruitment records;
- qualifications;
- employment history;
- references;
- payroll information;
- pension information; and
- performance management records.

Special Category Data

The School may process information relating to:

- physical or mental health;
- disabilities and medical conditions;
- racial or ethnic origin;
- religious beliefs;
- biometric data, where applicable; and
- safeguarding information.

Criminal Offence Information

The School may process criminal records information where permitted by law, including:

- DBS checks;
- safeguarding investigations; and
- criminal allegations and convictions where relevant.

5. LAWFUL BASES FOR PROCESSING

The School processes personal data on one or more of the following lawful bases:

Contract

Where processing is necessary for the performance of a contract with an individual or to take steps prior to entering into a contract.

Legal Obligation

Where processing is necessary for compliance with legal or regulatory obligations.

Legitimate Interests

Where processing is necessary for the legitimate interests of the School or another organisation and those interests are not overridden by individual rights and freedoms.

Vital Interests

Where processing is necessary to protect someone's life or safety.



Policy Title: Privacy Policy	Reviewed: Oct 26
School Section: Whole School	Reviewer: VLB
Audience: Whole School	Revision: 1.7

Consent

Where consent is required under data protection law.

Where Special Category Data is processed, the School will rely on additional lawful conditions permitted under UK GDPR and the Data Protection Act 2018.

6. WHY WE PROCESS PERSONAL DATA

The School processes personal data in order to:

Admissions and Pupil Management

- assess applications;
- manage enrolment;
- verify identity;
- administer bursaries and scholarships;
- support educational provision.

Educational Provision

- teach and assess pupils;
- monitor academic progress;
- provide learning support;
- administer examinations;
- organise educational visits and activities.

Safeguarding and Welfare

- fulfil safeguarding responsibilities;
- maintain pastoral records;
- protect pupils, staff and visitors;
- manage medical needs and emergencies.

Employment and Recruitment

- recruit staff;
- manage employment matters;
- administer payroll and pensions;
- carry out DBS and safeguarding checks.

School Operations

- manage finances and fee collection;
- maintain records;
- manage IT systems;
- provide security and site management.



Policy Title: Privacy Policy	Reviewed: Oct 26
School Section: Whole School	Reviewer: VLB
Audience: Whole School	Revision: 1.7

Alumni and Development Activity

- maintain relationships with former pupils;
- organise school events;
- provide newsletters and publications;
- undertake fundraising activity where permitted by law.

Legal and Regulatory Compliance

- comply with statutory duties;
- cooperate with regulators;
- respond to complaints, investigations and legal proceedings.

7. HOW WE COLLECT PERSONAL DATA

Personal data is obtained from a variety of sources, including:

- parents and pupils;
- staff members;
- application and registration forms;
- correspondence and communications;
- previous schools;
- examination boards;
- local authorities;
- healthcare professionals;
- government agencies;
- publicly available sources; and
- third-party service providers.

References received by the School are treated confidentially.

8. SHARING PERSONAL DATA

The School may share information with:

- MIST;
- examination boards;
- local authorities;
- the Department for Education;
- HMRC;
- DBS;
- police and safeguarding agencies;
- legal advisers;
- insurers;
- auditors;
- professional advisers;
- educational software providers; and
- contracted service providers.



Policy Title: Privacy Policy	Reviewed: Oct 26
School Section: Whole School	Reviewer: VLB
Audience: Whole School	Revision: 1.7

Information is only shared where there is a lawful basis for doing so.

Within the School, access to personal information is restricted to those who require it in order to carry out their responsibilities.

Enhanced protections apply to:

- safeguarding records;
- pastoral records;
- medical information; and
- child protection files.

9. SAFEGUARDING RECORDS AND CPOMS

The School uses CPOMS, a secure safeguarding and pastoral management system, to record and manage safeguarding, child protection, welfare and wellbeing concerns.

Access to CPOMS is restricted to authorised staff members who require access in the course of their duties.

The School is required by law and statutory guidance, including *Keeping Children Safe in Education*, to record, retain and where necessary share safeguarding concerns with relevant agencies.

10. CCTV

The School operates CCTV systems across its sites to:

- safeguard pupils, staff and visitors;
- prevent and detect crime;
- protect School property;
- investigate incidents; and
- assist with health and safety obligations.

CCTV footage is managed in accordance with the School's CCTV Policy.

11. INTERNATIONAL TRANSFERS

Some of the School's service providers may process personal data outside the United Kingdom.

Where personal data is transferred internationally, the School will ensure that appropriate safeguards are implemented, including approved contractual protections and other measures required by UK GDPR.

12. DATA SECURITY

The School takes appropriate technical and organisational measures to protect personal data from:

- unauthorised access;
- unlawful processing;
- accidental loss;



Policy Title: Privacy Policy	Reviewed: Oct 26
School Section: Whole School	Reviewer: VLB
Audience: Whole School	Revision: 1.7

- destruction; or
- damage.

Such measures include:

- access controls;
- encryption;
- staff training;
- secure storage systems;
- cyber security controls; and
- regular security reviews.

Whilst every effort is made to protect information, no method of transmission over the internet can be guaranteed to be completely secure.

13. PERSONAL DATA BREACHES

The School maintains procedures for identifying, investigating and responding to personal data breaches.

Where required by law, the School will notify:

- the Information Commissioner's Office (ICO); and/or
- affected individuals.

14. HOW LONG WE KEEP PERSONAL DATA

The School retains personal data in accordance with its Data Retention Policy.

Retention periods vary depending upon:

- the type of information;
- the purpose for which it was collected;
- statutory requirements; and
- safeguarding obligations.

In certain circumstances, information may be retained for historical, legal or archival purposes.

The School may also retain minimal information, such as suppression records, to ensure future communication preferences are respected.

15. KEEPING IN TOUCH

The School may use contact details to provide:

- newsletters;
- event invitations;
- alumni communications;
- fundraising information;
- development updates; and



Policy Title: Privacy Policy	Reviewed: Oct 26
School Section: Whole School	Reviewer: VLB
Audience: Whole School	Revision: 1.7

- news about the School.

Individuals may opt out of receiving marketing or fundraising communications at any time by contacting:

data@woodhousegrove.co.uk

The School will only send such communications where permitted by law.

16. AUTOMATED DECISION-MAKING

The School does not carry out automated decision-making or profiling that produces legal or similarly significant effects on individuals.

17. YOUR RIGHTS

Under UK GDPR, individuals have the right to:

Right of Access

Request access to personal data held by the School.

Right to Rectification

Request correction of inaccurate or incomplete information.

Right to Erasure

Request deletion of personal data in certain circumstances.

Right to Restrict Processing

Request limits on how personal data is used.

Right to Data Portability

Request transfer of personal data to another organisation where applicable.

Right to Object

Object to certain processing activities, including direct marketing.

Rights Relating to Automated Decision-Making

Request human review of automated decisions where applicable.

Requests should be submitted to:

data@woodhousegrove.co.uk

The School will respond in accordance with statutory timescales.

18. PUPILS AND PARENTAL RIGHTS

The School recognises that pupil information belongs to the pupil.



Policy Title: Privacy Policy	Reviewed: Oct 26
School Section: Whole School	Reviewer: VLB
Audience: Whole School	Revision: 1.7

Subject Access Requests may be made by pupils who have sufficient maturity to understand the request.

The School will assess requests on a case-by-case basis, taking into account:

- the age and maturity of the pupil;
- parental responsibility;
- confidentiality obligations;
- safeguarding considerations; and
- the best interests of the pupil.

Parents will continue to receive information required under the Parent Contract and which is necessary to support their child's education and welfare.

19. INFORMATION FOR PUPILS

Where appropriate to their age and understanding, pupils will be informed about:

- how their information is used;
- who it may be shared with;
- how it is protected; and
- their rights under data protection legislation.

20. ACCURACY OF INFORMATION

Individuals are asked to notify the School promptly of any changes to their personal information.

The School will take reasonable steps to ensure personal data remains accurate and up to date.

21. CHANGES TO THIS PRIVACY NOTICE

The School may amend this Privacy Notice from time to time to reflect changes in legal requirements, operational practices or School procedures.

The most recent version will be published on the School website.

22. COMPLAINTS

Questions regarding this Privacy Notice should be directed to:

data@woodhousegrove.co.uk

Individuals also have the right to raise concerns with the Information Commissioner's Office (ICO).

Further information is available from the ICO:

<https://www.ico.org.uk>

The School would appreciate the opportunity to address any concerns before the ICO is contacted.