



DATA PROTECTION POLICY FOR PUPILS, PARENTS AND STAFF

THIS POLICY

- This policy is intended to provide information about how The Group will use (or "process") personal data about individuals including current, past and prospective pupils; and their parents, carers or guardians (referred to in this policy as "parents").
- It applies in addition to The Group's terms and conditions, and any other information The Group may provide about a particular use of personal data, including e.g. The Group's policy on taking, storing and using images of children.
- Anyone who works for, or acts on behalf of, The Group (including staff, volunteers, governors and service providers) should also be aware of and comply with The Group's data protection policy for staff, which also provides further information about how personal data about those individuals will be used.

RESPONSIBILITY FOR DATA PROTECTION

- In accordance with the Data Protection Act 1998 ('the Act'), The Group has notified the Information Commissioner's Office of its processing activities. The Group's ICO registration number is ZA560394 and its registered address is 25-27 High St, Corsham, Wiltshire SN13 0ES.
- The Group has appointed Paul Easterbrook as Data Protection Officer ("DPO") who will endeavour to ensure that all personal data is processed in compliance with this policy and the Act.

TYPES OF PERSONAL DATA PROCESSED BY THE GROUP

- The Group may process a wide range of personal data about individuals including current, past and prospective pupils and their parents as part of its operation, including 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); [and biometric information, which will be collected and used by The Group in accordance with The Group's biometrics policy.]
 - bank details and other financial information, e.g. about parents who pay fees to The Group;
 - past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
 - where appropriate, information about individuals' health, and contact details for their next of kin;
 - references given or received by The Group about pupils, and information provided by previous educational establishments and/or other professionals or organisations working with pupils; and
 - images of pupils (and occasionally other individuals) engaging in school activities, and images captured by The Group's CCTV system (in accordance with The Group's policy on taking, storing and using images of children);
 - Generally, The Group receives personal data from the individual directly (or, in the case of pupils, from parents). However in some cases personal data may be supplied by third parties (for example another school, or other professionals or authorities working with that individual), or collected from publicly available resources.
 - The Group may, from time to time, need to process "sensitive personal data" regarding individuals. Sensitive personal data includes information about an individual's physical or mental health, race or ethnic origin, political or religious beliefs, sex life, trade union

membership or criminal records and proceedings. Sensitive personal data is entitled to special protection under the Act, and will only be processed by The Group with the explicit consent of the appropriate individual, or as otherwise permitted by the Act.

USE OF PERSONAL DATA BY THE GROUP

- The Group will use (and where appropriate share with third parties) personal data about individuals for a number of purposes as part of its operations, including as follows:
 - For the purposes of pupil selection and to confirm the identity of prospective pupils and their parents;
 - To provide education services (including SEN), career services, and extra-curricular activities to pupils; monitoring pupils' progress and educational needs; and maintaining relationships with alumni and The Group community;
 - For the purposes of management planning and forecasting, research and statistical analysis, and to enable the relevant authorities to monitor The Group's performance;
 - 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 public examinations or other achievements of pupils of The Group;
 - To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so, for example for medical advice, insurance purposes or to organisers of school trips;
 - To monitor (as appropriate) use of The Group's IT and communications systems in accordance with The Group's IT: acceptable use policy;
 - To make use of photographic images of pupils in school publications, on The Group website and (where appropriate) on The Group's social media channels in accordance with The Group's policy on taking, storing and using images of children;
 - For security purposes, and for regulatory and legal purposes (for example child protection and health and safety) and to comply with its legal obligations; and
 - Where otherwise reasonably necessary for The Group's purposes, including to obtain appropriate professional advice and insurance for The Group.

KEEPING IN TOUCH AND SUPPORTING THE GROUP

- The Group will use the contact details of parents, alumni and other members of The Group community to keep them updated about the activities of The Group, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, The Group may also:
 - Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with The Group community;
 - Should you wish to limit or object to any such use, or would like further information about them, please contact the DPO in writing.

RIGHTS OF ACCESS TO PERSONAL DATA ("SUBJECT ACCESS REQUEST")

- Individuals have the right under the Act access to personal data about them held by The Group, subject to certain exemptions and limitations set out in the Act. Any individual wishing to access their personal data should put their request in writing to the DPO.
- The Group will endeavour to respond to any such written requests (known as "subject access requests") as soon as is reasonably practicable and in any event within statutory time-limits.
- You should be aware that certain data is exempt from the right of access under the Act. This may include information which identifies other individuals, or information which is subject to legal professional privilege. The Group is also not required to disclose any pupil examination scripts (though examiners' comments may fall to be disclosed), nor any reference given by The Group for the purposes of the education, training or employment of any individual.
- Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of The Group, they have sufficient maturity to understand the request they are making. Pupils aged 12 or over are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested. All subject access requests from pupils will therefore be considered on a case by case basis.
- A person with parental responsibility will generally be expected to make a subject access request on behalf of younger pupils. A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

WHOSE RIGHTS

- The rights under the Act belong to the individual to whom the data relates. However, The Group will in most cases rely on parental consent to process personal data relating to pupils (if consent is required under the Act) unless, given the nature of the processing in question, and the pupil's age and understanding, it is more appropriate to rely on the pupil's consent. Parents should be aware that in such situations they may not be consulted.
- In general, The Group will assume that pupils consent to 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, unless, in The Group'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, The Group will maintain confidentiality unless, in The Group's opinion, there is a good reason to do otherwise; for example where The Group believes disclosure will be in the best interests of the pupil or other pupils.
- Pupils are required to respect the personal data and privacy of others, and to comply with The Group's [IT Acceptable Use Policy](#).

DATA ACCURACY AND SECURITY

- The Group will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the DPO of any changes to information held about them.
- An individual has the right to request that inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under the Act) and may do so by contacting the DPO in writing.
- The Group will take appropriate technical and organisational steps to ensure the security of personal data about individuals. All staff will be made aware of this policy and their duties under the Act.

QUERIES AND COMPLAINTS

- Any comments or queries on this policy should be directed to the DPO using the email address data.protection@wishford.co.uk



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- If an individual believes that The Group has not complied with this policy or acted otherwise than in accordance with the Act, they should utilise The Group's complaints policy and should also notify the DPO.