

# **WOLVERHAMPTON GRAMMAR SCHOOL**

## **PRIVACY NOTICE FOR HIRERS, VISITORS AND CONTRACTORS**

### **INTRODUCTION**

This Privacy Notice is intended to provide information about how the School\* will use (or "process") personal data about individuals (as opposed to company data) including: its current, former and prospective hirers (collectively referred to in this policy as hirers); its current, former and prospective visitors (collectively referred to in this policy as visitors) and its current, former and prospective contractors (collectively referred to in this Privacy Notice as contractors).

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Hirers, Visitors and Contractors are all encouraged to read this Privacy Notice and understand the School's obligations to its entire community.

This Privacy Notice applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Notice also applies in addition to the School's other relevant terms and conditions and policies, including:

- any contract between the School and the Hirer including the Lettings Contract;
- any contract between the School and the Contractor;
- Taking, Storing and Using Images of Children Policy;
- CCTV Policy
- Data Retention Guide;
- Safeguarding Policy, including how concerns or incidents are recorded;
- Health and Safety Policy;

Anyone who works for, or acts on behalf of, the School (including staff, volunteers, directors, trustees and service providers) should also be aware of and comply with the School's Privacy Notice for Staff and the School's Privacy Notice for Alumni, which also provides further information about how personal data about those individuals will be used.

\*The School, acting as data controller, includes Wolverhampton Grammar School (WGS) Ltd, WGS Independence Appeal Funds, WGS 1958 Fund and WGS Enterprises Ltd.

### **RESPONSIBILITY FOR DATA PROTECTION**

The School has appointed Shona Hemmings, Finance Director as Privacy and Compliance Officer who will deal with all your requests and enquiries concerning the School's 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 THE SCHOOL NEEDS TO PROCESS PERSONAL DATA**

In order to carry out its ordinary duties for hirers, visitors and contractors, the School needs to process a wide range of personal data about individuals (including current, past and prospective hirers, visitors or contractors) as part of its daily operation.

The School will need to carry out some of these ordinary duties in order to fulfil its legal rights, duties or obligations, including those under a contract with the hirers or contractors.

Other uses of personal data will be made in accordance with the School'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.

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

- For the purposes of confirming the identity of hirers, visitors and contractors for safeguarding and security reasons;
- To provide education services, including musical education, physical training or spiritual development, career services, and extra-curricular activities to pupils;
- To maintain relationships with the School community, including direct marketing activity;
- To make or collect payments for the provision of facilities or services;
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
- For security purposes, including biometrics and CCTV in accordance with the School's Biometric Recognition Guidance and CCTV Policy;
- To carry out or cooperate with any School or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.

In addition, the School will on occasion need to process **special category personal data** (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it 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 who need to be made aware of dietary or medical needs;
- To run any of its systems that operate on biometric data, such as for security;
- 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.

## **TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL**

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details (including social media accounts if applicable);
- car details (about those who use our car parking facilities);
- biometric information, which will be collected and used by the School in accordance with the School's Guidance on Biometric Recognition Systems.
- bank details and other financial information e.g. debit card details;
- where appropriate, information about individuals' health; dietary and welfare needs, and contact details for their next of kin and/or emergency contact details; GP contact details;
- correspondence with and concerning hirers, visitors and contractors; and

- images of individuals engaging in School activities, and images captured by the School's CCTV system.

## HOW THE SCHOOL COLLECTS DATA

Generally, the School receives personal data from the individual directly. This may be via a form, or simply in the ordinary course of interaction or communication (such as email or telephone conversations).

We are grateful to individuals for sharing their professional experiences with pupils in order to inspire them through talks and to assist them through career advice or work experience. We are also interested to learn of individuals' professions as talks from these individuals may assist us in raising funds for our charitable causes. On occasions therefore, we may obtain information from public media and internet sites (e.g. LinkedIn) to find information about your professional life and to contact you to find out if you would be interested in supporting us by talking at our events.

However, in some cases personal data will be supplied by third parties (for example another alumni, or other professionals or authorities working with that individual in addition to wealth screening organisations when required); or collected from publicly available resources.

## WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH

**Processing by third parties:** For the most part, personal data collected by the School will remain within the School, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). However, some functions are outsourced, such as IT systems, web developers or cloud storage providers. In accordance with Data Protection Law, this type of external data is always subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions.

**Data sharing.** Occasionally, the School will need to share personal information relating to its community with third parties, such as:

- If you use third party platforms to book onto an event (e.g. Ticketsource), then we will receive information about you from them;
- In accordance with our legal obligations, will share information with local authorities, the Independent Schools Inspectorate and the Department for Education, for example, where we have any safeguarding concerns;
- On occasion, we may need to share information with the police for the prevention and investigation of crime and the prosecution of offenders;
- We may also need to share information with our legal advisers for the purpose of obtaining legal advice;
- We will need to share information if there is an emergency, for example, if you are hurt whilst on School premises or at one of our events;
- We may need to share information with other contractors who help us with our work (e.g. a printing company for our literature);

## HOW LONG WE KEEP PERSONAL DATA

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason.

Records are held in line with our Data Retention Guide though if you have any specific queries about how this is applied or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact Shona Hemmings by email on: [bursar@wgs-sch.net](mailto:bursar@wgs-sch.net). However,

please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such request.

## **KEEPING IN TOUCH AND SUPPORTING THE SCHOOL**

The School will use the contact details of hirers, visitors, contractors and other members of the School community to keep them updated about the activities of the School including by sending updates and newsletters, by email and by post.

## **SENDING INFORMATION TO OTHER COUNTRIES**

We may send your information to countries which do not have the same level of protection for personal information as there is in the UK, e.g. when communicating with you if you live overseas, or storing your information on computer servers based overseas. The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: [Data protection adequacy for non-EU countries \(europa.eu\)](https://ec.europa.eu/data-protection/our-work/news/data-protection/adequacy-for-non-eu-countries)

If the country that we are sending your information to is not on the list, or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland), then, in the absence of any other safeguards, it might not have the same level of protection for personal information as there is in the UK.

Where appropriate we may put in place additional safeguards, for example, if we are using a third party to process a payment then we may ask them to contract with us using model data protection clauses provided by the European Commission in the absence of any other appropriate safeguard. If you would like more information about the safeguards that are in place, please contact the Finance Director.

## **YOUR RIGHTS**

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the School, and in some cases ask for it to be erased or amended or have it transferred to others, or for the School to stop processing it, but subject to certain exemptions and limitations.

The School will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is generally one month, but actually fulfilling more complex or multiple requests e.g. those involving third party information, may take 1-2 months longer).

### **Rights of access etc.**

The School will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the School may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

If you consider that the personal data we hold on you is inaccurate, please let us know. However, the School will not necessarily delete or amend views, opinions, notes or records purely on the request of an individual who disputes the account, although we may keep a record of all parties' viewpoints.

### **Requests that cannot be fulfilled**

You should be aware GDPR rights (including the right of access) are limited to your own personal and certain data is exempt from the right of access. This will include information which identifies other individuals or information which is subject to legal privilege (for example legal advice given to or sought by the School, or documents prepared in connection with a legal action).

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a proportionate legitimate interest identified in this Privacy Notice. Generally, if the School still considers the processing of the personal data to be reasonably necessary, it is entitled to continue. All such requests will be considered on their own merits.

## **Consent**

Where the School is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Examples where we do rely on consent are: e.g. biometrics, certain types of uses of images, certain types of fundraising activity and for electronic communication for marketing purposes. Please be aware however that the School may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice or may otherwise exist under some form of contract or agreement with the individual (e.g. the Lettings Contract, or because a purchase of goods or services has been requested).

## **Whose rights?**

The rights under Data Protection Law belong to the individual to whom the data relates.

## **DATA ACCURACY AND SECURITY**

The School 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 please notify the School of any significant changes to important information, such as contact details, which are held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the School may need to process your data, of who you may contact if you disagree.

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to School systems. All staff and Directors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

## **THIS PRIVACY NOTICE**

The School 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 Shona Hemmings, the Finance Director using the following contact details: [bursar@wgs-sch.net](mailto:bursar@wgs-sch.net) or in writing to the School. Pupils in particular are encouraged to seek an explanation of any area within this policy which is not clear to them.

If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the School's Complaints Policy and should also notify the Finance Director. 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.

**Please also refer to the following policies:**

Health and Safety Policy – Staff network and website	Safeguarding Policy – Staff network and website
Staff Code of Conduct – Website and Employment Manual	Security, Access Control and Workplace Safety – Staff network and website
Taking, Using and Storing of Images of Children Policy – Staff network and website	Privacy Notice for Staff – Website and Employment Manual
Privacy Notice for Alumni, Friends and Supporters – Staff network and website	Privacy Notice for Pupils and Parents – Staff network and website
CCTV Policy – Staff network and website	

**Monitoring and Evaluation of this policy**

The School monitors and evaluates its Privacy Notice through the following activities:

- Record keeping of training records for staff in data protection
- Review of regulatory compliance by F&GP Committee
- Review of concerns and complaints registers by SMT and Board of Directors
- Review of safeguarding register by Head and Designated Safeguarding Director

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September 2024

Next Review:  
September 2025