

# **WOLVERHAMPTON GRAMMAR SCHOOL**

## **PRIVACY NOTICE FOR ALUMNI, FRIENDS AND SUPPORTERS**

### **INTRODUCTION**

This Privacy Notice is intended to provide information about how the School\* will use (or "process") personal data about individuals including former pupils, parents, staff, friends of the School and donors (collectively referred to in this Privacy Notice as alumni).

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, parents, pupils and alumni 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:

- Taking, Storing and Using Images of Children Policy;
- CCTV Policy
- Biometric Recognition Systems Guidance for Pupils and Staff;
- Data Retention Guide;
- Safeguarding Policy, including how concerns or incidents are recorded;
- Health and Safety Policy; and
- Acceptable Use Policy for Pupils.

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 Pupils and Parents, 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 Foundation, WGS Independence Appeal Funds, WGS 1958 Fund and WGS Enterprises Ltd.

### **RESPONSIBILITY FOR DATA PROTECTION**

The School has appointed Penny Rudge, Bursar 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 alumni/development work within the School, the School needs to process a wide range of personal data about its alumni 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 parents of its pupils.

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**":

- Maintaining relationships with alumni and the School community, including direct marketing and/or fundraising activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and the background and relevant interests;
- For the purposes of wealth screening when a fundraising campaign takes place;
- To enable the collection of subscriptions, donations and payment for events and activities;
- For alumni event or similar activities registration;
- To make use of photographic images and names of former pupils and staff (or other individuals) in School publications, archive records and displays, in archive enquiries by other Alumni and/or their families, on the School website, and (where appropriate) on the School's social media channels in accordance (where applicable) with the School's policy on Taking, Storing and Using Images of Children;
- For security purposes, including biometrics and CCTV in accordance with the School's Biometric Recognition Systems Guidance and CCTV Policy;
- For the purposes of archive research and reference by the School community including other alumni;
- For teaching and learning purposes, making use of incidental digital capture of images and voices of past pupils and staff (or other individuals) in the filming of lessons/presentations for internal publication and pupil use through Firefly in accordance with the School's Taking, Storing and Using Images of Children Policy 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 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 and other forms of identification (e.g. entry door controls.); 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:

- dates when you or your child attended the School (if applicable);
- if you are a former member of staff, the dates when you worked at the School;
- names, addresses, telephone numbers, e-mail addresses and other contact details ((including social media accounts if applicable);
- pupil date of birth; sibling records; previous school (if applicable); ethnicity and religious beliefs (if supplied);
- car details (about those who use our car parking facilities);
- information about your achievements and interests;
- information about and images taken during your curricular and ex-curricular involvement whilst you were at School e.g. being in a School play, on a School trip, in a football team etc.
- where you attended university and your occupation and organisation (if applicable);
- information about any bursaries or scholarships you have received;
- how you would like to hear from us e.g. whether you have signed up to receive emails from us;
- your involvement with us e.g. if you provide talks at careers fairs;
- information and notes about visits to School or off-site;
- bank details and other financial information provided e.g. from donors or for event payments;
- your gift aid status (if applicable);
- information from articles in the media and from web searches;
- any dietary requirements for catering purposes that you have provided;
- any disability which you may have so that we may make reasonable adjustments for you;
- copies of correspondence; and
- permission to display names on event lists on website, social media accounts, event literature, etc;
- images of alumni taken during visits or attendance at events, and/or as part of the wider School community engaging in School activities, and images captured by the School's CCTV system or through the digital capture of lessons (in accordance where applicable with the School's Taking, Storing and Using Images of Children Policy and CCTV Policy);

## **HOW THE SCHOOL COLLECTS DATA**

Generally, the School receives personal data from the individual directly (including, in the case of younger past pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication such as email. In addition, basic data regarding former pupils and their parent/s is transferred from the main School management information system to the Development Office management information system.

You also may provide us with information about yourself during the course of our relationship with you e.g. when you sign up to receive communications from us or order tickets for an event.

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 for donations (e.g. JustGiving) then we will receive information about you from them;
- 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 contractors who help us with our work (e.g. a printing company for our literature);
- We may share information with data cleansing organisations to ensure our data is kept up to date;
- We may share information with wealth screening organisations to help us with our fundraising campaigns;
- We may share information with the School's Alumni and Friends' Associations; and
- We may share articles, information and images from your time at School with other Alumni and/or their families where the information about you is incidental to their archive enquiry.

## 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. For example, we will need to retain contact details for you for so long as you want to be a part of the School community so that we can communicate with you.

We will also need to keep a record if you tell us that you do not want to hear from us anymore, so that we do not inadvertently add you to our mailing list in the future.

We will keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example if we consider the information might be useful if someone wanted to write a book about the School or for displaying archive material at an alumni event.

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 Penny Rudge 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 members of the School community to keep them updated about the activities of the School, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the School will also:

- Share personal data about former pupils, parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the School community, such as the Old Wulfrunians' Association and Friends' Association.
- Contact former pupils, parents and/or alumni, including via the organisations above, by post and email in order to promote and raise funds for the School and, where appropriate, other worthy causes;
- Collect information from publicly available sources about parents' and former pupils' occupation and activities, in order to re-establish lost contact and to maximise the School's fundraising potential.

Should you wish to limit or object to any such use, or would like further information about them, please contact the Bursar, Penny Rudge in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the School is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

## **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: [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm)

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 Bursar.

## **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 that GDPR rights (including the right of access) are limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – please see further below), 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).

The School is also not required to disclose any pupil examination scripts (or other information consisting solely of pupil test answers), provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the School itself for the purposes of the education, training or employment of any individual.

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.

## **Former Pupil requests**

Former pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the School, they have sufficient maturity to understand the request they are making (see section **Whose Rights?** below). A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, the law still considers the information in question to be the child's.

Former pupils at Wolverhampton Grammar School aged 13 and above are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home. Slightly younger children may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

## **Former Parental requests**

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Former parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about former pupils without their consent. The School may consider there are lawful grounds for sharing with or without reference to that former pupil.

All information requests from, on behalf of, or concerning former pupils whether made under subject access or simply as an incidental request, will therefore be considered on a case by case basis.

## **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 parent contract, or because a purchase of goods, services or membership of an organisation such as the Alumni or Friends' Association has been requested).

## **Whose rights?**

The rights under Data Protection Law belong to the individual to whom the data relates. However, the School will often rely on parental authority or notice for the necessary ways it processes personal data relating to former pupils if they are still within normal School age e.g. under the parent contract, or via a form. Former parents and pupils should be aware that this is not necessarily the same as the School relying on strict consent (see section on Consent above).

Where consent is required, it may in some cases be necessary or appropriate given the nature of the processing in question, and the former pupil's age and understanding to seek the former pupil's consent. Former parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

## **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, 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 the Bursar, Penny Rudge using the following contact details: [bursar@wgs-sch.net](mailto:bursar@wgs-sch.net) or in writing to the School.

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 Bursar. 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 Policy – Staff network and website	Privacy Notice for Staff – Employment Manual
Privacy Notice for Pupils and Parents – Staff network and website	Privacy Notice for Hirers, Visitors and Contractors – 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

PCR  
September 2019

Next Review:  
September 2020