

# Belmont Woodside Federation PRIVACY POLICY

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#### 1 Introduction

Belmont Woodside Federation is committed to protecting the privacy and security of your personal information. We take care to protect the privacy of our staff, pupils, parents and suppliers that communicate (online or offline) with us, in school, events, over the phone, through our mobile applications, websites and social media platforms.

We have therefore developed this privacy policy to inform you of the data we collect, what we do with your information, what we do to keep it secure as well as the rights and choices you have over your personal information.

#### 2 Who we are

Belmont Woodside Federation is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

we are responsible for the collection and use of your personal data described in this privacy notice. References to "**BWF**", "**we**" and "**our**" throughout this notice, depending on the context, collectively refer to the aforementioned legal entities

### 3 The information we collect and when

We only collect information that we know we will genuinely use and in accordance with the General Data Protection Regulation (GDPR). The type of information that we will collect on you, and you voluntarily provide to us on this form includes:

- Your name
- Address
- Telephone number(s)
- Email address
- IP address
- DBS
- Personal ID
- references

We may, in further dealings with you, extend this information to include your address, purchases, services use, records of conversations and agreements and payment transactions

You are under no statutory or contractual requirement or obligation to provide us with your
personal information; however we require at least the information above in order for us to
deal with you as a staff member, prospective parent, pupil or supplier in an efficient and
effective manner.

 The legal basis for processing your data is based on your compliance with a legal obligation, public interest and for our legitimate interest that we will have requested at the point the information was initially provided, therefore we will not store, process or transfer your data outside the parties detailed above unless we have an appropriate lawful reason to do so.

#### **Public interest**

The School considers that it is acting in the public interest when providing education.

#### **Legitimate interests**

This means that the processing is necessary for legitimate interests except where the processing is unfair to you. BWF relies on legitimate interests for most of the ways in which it uses your information.

- Specifically, the School has a legitimate interest in:
- Providing educational services to your child;
- Safeguarding and promoting the welfare of your child (and other children);
- Promoting the objects and interests of the School.
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past, current and prospective students, and to provide references to potential employers of past students;

In addition, the School may need to process special category personal data (concerning health, ethnicity, religion, 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 may include:

- To safeguard students' welfare (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 where it is in the individual's
  interests to do so: for example for medical advice, social services, insurance purposes or
  to organisers of School trips;
- To provide educational services in the context of any special educational needs of a pupil;
- To provide spiritual education in the context of any religious beliefs;
- In connection with employment of its staff, for example DBS checks, welfare or pension plans;
- 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.

## 4 How we use your information

- To contact you, following your enquiry, reply to any questions, suggestions, issues or complaints you have contacted us about.
- Contact you about your child.
- provide correspondence via Agora and Parentmail
- Make available our policies and procedures.
- Take payment from you or give you a refund;
- For statistical analysis and to get feedback from you about our school, websites, and other events and activities.
- To power our security measures so you can safely access our website and Twitter.
- Provide you with details of meetings and events.
- Help answer your questions and solve any issues you have.

## 5 Who we might share your information with

We may share your personal data with other organisations in the following circumstances:

- If the law or a public authority says we must share the personal data.
- If we need to share personal data in order to establish, exercise or defend our legal rights (this includes providing personal data to others for the purposes of preventing fraud and reducing credit risk); or
- From time to time, employ the services of other parties for dealing with certain processes
  necessary for the operation of the website. However, all the information we share will be
  collected and anonymised, so neither you nor any of your devices can be identified from
  it.
- the Department for Education (DfE)
- youth services
- feeder schools or colleges
- local authority
- health professionals
- examination boards
- children's services
- transport

## 6 How we keep you updated on our products and services

We will send you relevant information about your child or our services in a number of ways including by email, but only if you have previously consented. When your child starts school with us we will ask for the relevant information that is legally required prior to admission.

Right to Access Your Personal Information

You have the right to access the personal information that we hold about you in many circumstances, by making a request. This is sometimes termed 'Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge and aim to do so within 30 days from when your identity has been confirmed.

We would ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.

If you would like to exercise this right, please contact us as set out below.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you would like to exercise this right, please contact us as set out below.

#### 6.1.1 For more information about your privacy rights

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here <a href="https://ico.org.uk/for-the-public">https://ico.org.uk/for-the-public</a>.

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. Your satisfaction is extremely important to us, and we will always do our very best to solve any problems you may have.

## 7 How long we keep your information for

We retain a record of your personal information in order to provide you with a high quality and consistent service. We will always retain your personal information in accordance with the General

Data Protection Regulation (GDPR) and never retain your information for longer than is necessary. Unless otherwise required by law, your data will be stored for a period of 2 years after our last contact with you, at which point it will be deleted. Other data such as safeguarding and HR documents are required to be stored for longer.

## 8 Giving your reviews and sharing your thoughts

When using our websites or mobile applications, you may be able to share information through social networks like Twitter. For example, when you 'like', 'share' or review our Services. When doing this, your personal information may be visible to the providers of those social networks and/or their other users. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts so you are comfortable with how your information is used and shared on them.

## 9 Security

Data security is of great importance to Belmont Woodside Federation and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure your collected data.

We take security measures to protect your information including:

- Limiting access to our buildings to those that we believe are entitled to be there (by use
  of passes, key card access and other related technologies);
- Implementing access controls to our information technology
- We use appropriate procedures and technical security measures (including strict encryption, anonymisation and archiving techniques) to safeguard your information across all our computer systems, networks, websites, mobile apps, classrooms and offices.
- Never asking you for your passwords;
- Advising you never to enter your account number or password into an email or after following a link from an email.

#### 10 How to contact us

If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this policy, the way your personal information is processed, please contact us by one of the following means:

By email: Exechead@bwf.education

By post: The DPO Centre Ltd, 50 Liverpool street, London EC2M 7PY

Thank you for taking the time to read our Privacy Policy.

#### **Belmont Woodside Federation**

Policy was last updated on 10<sup>th</sup> July 2018