



Wakefield Grammar School Foundation

PRIVACY NOTICES

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Version	Date	Change details
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V2.00	Aug 2025	Merged all Privacy Notices into one document

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WGSF JUNIOR SECTION PUPILS

PRIVACY NOTICE

1. Who we are?

Wakefield Grammar School Foundation (WGSF), is a family of schools including:

- Queen Elizabeth Grammar School (QEGS) for boys aged 7 to 18 years old
- Wakefield Girls' High School (WGHS) for girls aged 7 to 18 years old
- Wakefield Grammar Pre-Preparatory School (WGPPS) for children aged 3 to 7 years old.

2. What is this about?

A law was made in 2018 which keeps your information safe, things such as your address and your birthday.

Your School and other people collect and use information for all kinds of reasons and the law tells them exactly what they are allowed to do with your information.

We collect some information about our pupils, like you. It is our job to tell you how we will collect the information, how we will record it and how we use it.

In this Privacy Notice, you will see different names or words used which you may not be familiar with, such as:

- **Data Controller:** this person (or group of people, like our school) is in charge of the information that we collect.
- **Data Processor:** this person handles the information for the data controller who tells them what to do with the information.
- **Data Protection Officer (DPO):** this person makes sure we do everything the law says we must do. For our school this person is called Mrs Weeks.
- **Personal data:** this means any information which can be used to identify you such as your name, your address, your birthday.

3. Who looks after your information?

The school is the data controller of the personal information you give us. We look at how and why your information is collected and used.

Sometimes the school has to give your information to other people, such as the government or our schools' inspectors but we will only share your information when you say it is alright to do so or when the law says the school has to. When your information is given to someone else, they must look after it and keep it safe.

4. Why do we collect and use your information?

We will only collect your information when we need it to help us do our job or to follow the law. We must have a legal reason to collect your information. For our school the legal reason for collecting most of the information is known as “legitimate interests” which means we must consider the benefit to you before we ask for the information.

When we have collected it, here is how we use it:

- To give you a place at our school
- To support your learning, including after school and at school clubs and activities
- To monitor and report on your progress
- To provide you with the right amount of support
- To assess how we teach you
- To help look after you whilst you are in school
- To comply with the law

Sometimes we ask your parents to agree to the school recording special pieces of information about you such as your religion or information relating to your health.

5. What information do we collect?

The type of information the school collects, holds and shares include the following:

- **Your personal information** such as your name and address.
- **Your characteristics.** This means information about you, such as where you are from, what language you speak and things like that.
- **Your attendance information.** We record how many times you missed school and the reasons why you didn't come to school.
- **Your assessment information.** We collect your test results when you sit a test or as you learn about new things in the classroom.
- **Some of your medical information.** We keep information about how many times you have been ill and anything your parents tell us about special illnesses you may have which we need to know about to keep you safe
- **Your learning support in the classroom.** We collect information which helps us teach you better, such as any learning support or special educational needs you may have.
- **Behavioural information.** We record how well you behave in school, particularly if you have misbehaved, the number of times and the reasons why.
- **Photographs.** Using photographs of you, or filming you as you come into school or when you are in the playground, counts as processing your personal data. Sometimes we have to take photographs or film (CCTV) to help keep you safe or as part of your learning. Other times we may take photographs to celebrate the achievements of you or the school so use these on our website or to tell people about our school. Before we take or use your photograph we will either ask you (if you are old enough) or your parents to give us permission for us to take and use pictures of you.

6. Do you have to give us your information?

You must give us quite a lot of the information we need, but there is some information which you can choose whether to let us have it or not.

When we ask you for information which you don't have to give us, we will ask for your permission and let you know why we want it and what we will do with it. If you don't want us to have the information, that is your choice.

7. How long will we keep your information?

We do not keep information forever, only for as long as we need it to help us do the task we need it for. We have a policy which tells us when to keep it and when to dispose of it. Any information we no longer need is either shredded or safely removed from our systems so no one else can use it.

8. Will your information be shared?

We will not share your information with anyone else without your permission, unless the law says we can or should. Any information will only be shared if it is absolutely vital. We may share information with

- The government (Department for Education) so they know who you are and that you are in school. They may ask us to share things like your name and birthday, how often you come to school, how well you are doing whilst at school. They have to share some of that information with other people who help schools and pupils like you. Do not worry, they keep your information safe and it will not be lost or given to anyone who should not have it;
- Doctors and nurses if you became poorly at school and we couldn't contact your parents, so you receive the right care;
- The people who inspect our school. We do this so they can see how well the school is providing you with an education;
- People whose job it is to make sure you are safe whilst in school and at home. This will include lunch staff who would need to know if you have an allergy;
- Travel companies / people whose job it is to book school trips to make sure that you are safe whilst on a school trip. We will share your information including any foods you cannot eat or medicines you take, along with who to contact in an emergency if you are poorly when not in school. We will only share this information where your parents have agreed to you taking part on the trip.
- Online learning companies so that you can take part in fun activities / lessons on your computer and your teachers can see how much you know and how well you are doing;
- If you leave, we will share your information with your new school

9. What are your rights?

You and your parents have the right to:

- Be told how we use your information
- Ask to see the information we hold
- Ask us to change information you think is wrong
- Ask us to remove information when it is not needed anymore
- Ask us to only use your information in certain ways
- Tell us you do not want your information to be processed.

Sometimes the law will not allow us to comply with your request but if the information we are collecting is information which you can choose not to give, you can tell us to stop collecting it at any time.

If you are worried about how we get and use your information, you can speak to your teacher at the school. They will be able to help you and answer any questions you have. If you want to speak to someone not at the school, you can ask your parents to call the people who look after your information so you can speak with them. They are called the Information Commissioner's Office. Their telephone number is 0303 123 1113.

10. Would you like to know more?

If you or your parents would like to find out more information about how we collect, use and store your personal information, then please see the policies page on our website where you will find our Data Protection Policy and other privacy notices [WGSF Policies](#)

11. Four important things to understand

- The law allows us to get and use your information to help us do our job
- We may share your information with others, but only when we really need to
- We will ask for your permission to share your information whenever you have a choice
- You can tell us not to share your information, even if you have said yes before

12. This Policy

The school will review this Privacy Notice every year. If there are any big changes which affect your rights, we will share them with you as soon as we can.

WGSF PARENTS AND SENIOR SECTION PUPILS

PRIVACY NOTICE

1. Introduction - who we are

Wakefield Grammar School Foundation is a Registered Charity (Charity number 1088415) and a Company Limited by Guarantee (company number 4258359 registered in England) with its registered office at 158 Northgate, Wakefield, WF1 3UF.

W.I.S. (Education) Ltd is a subsidiary of Wakefield Grammar School Foundation.

Wakefield Grammar School Foundation (WGSF), referred to as 'the Foundation', is a family of single-sex independent day schools incorporating Queen Elizabeth Grammar School (QEGS), Wakefield Girls' High School (WGHS) and a COED Wakefield Grammar Pre-Prep School (WGPPS) delivering education to children aged 3 - 18.

WGSF is the data controller of the personal information you provide to us. This means the Foundation determines the purposes for which, and the manner in which, any personal data relating to pupils and their families is to be processed. The Director of Finance and Operations acts as a representative for the Foundation with regard to its data controller responsibilities; they can be contacted at the registered office.

2. The purpose of this Privacy Notice

This policy is intended to provide information about how the Foundation will use (or "process") personal data about individuals including its current and prospective pupils; and their parents, carers or guardians (referred to in this policy as "parents").

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Parents and senior section pupils are encouraged to read this Privacy Notice and understand the Foundation's obligations to its entire community. The Foundation has separate Privacy Notices applicable to its junior section pupils, Staff, Visitors, Alumni, Archives and Events and Hirers of Facilities.

This Privacy Notice applies alongside any other information the Foundation 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 Foundation's other relevant terms and conditions and policies, including:

- any contract between the Foundation and the parents of pupils;
- the Foundation's Use of Images of Pupils Policy;
- the Foundation's CCTV policy;
- the Foundation's Data Retention, Storage and Disposal policy;
- the Foundation's Safeguarding and Child Protection Policy, Health and Safety Policy and any other pastoral policies, including as to how concerns or incidents are recorded;
- the Foundation's ICT policies, including its ICT Acceptable Use policy and Bring Your Own Device Policy;
- Privacy Notice, Development, alumni, archives and events;
- Gift Acceptance Policy (Donations and Ethical Fundraising).

Anyone who works for, or acts on behalf of, the Foundation (including staff, volunteers, governors and service providers) should also be aware of and comply with the Foundation's Privacy Notices and Data Protection Policy for Staff, which also provides further information about how personal data on those individuals will be used. Staff will also receive suitable training commensurate with their role.

Policies can be downloaded by following the link [Policies - Wakefield Grammar School Foundation](#).

3. Responsibility for Data Protection

The Foundation's Compliance Manager acts as the Data Protection Officer and deals with requests and enquiries concerning the Foundation's uses of personal data (see section 10 on Your Rights below). The Compliance Manager will endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law. For any queries, please contact dataprotectionofficer@wgsf.net. Telephone 01924 231625.

4. Why the Foundation needs to process personal data

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

The Foundation will need to carry out some of this activity 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 Foundation'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 Foundation expects that the following uses will fall within that category of its (or its community's) “**legitimate interests**”:

- For the purposes of pupil selection to confirm the identity of prospective pupils and their parents and retain a record, if appropriate, for the purpose of future applications or openings;
- For the purposes of educational and learning needs / monitoring of progress via education services/platforms, including E Learning, musical education, physical training, spiritual development, career services, and extracurricular activities;
- Maintaining relationships with alumni and the school community, including direct marketing or fundraising activity;
- For the purposes of financial due diligence (the practical checks we make to confirm the identity, credentials and good standing of the individuals and organisations who give money to the Foundation or who enter into significant financial transactions such as fees in advance arrangement). In some cases other data are added, including, but not limited to, information about partners, financial and other data you have disclosed to us or which we have derived from public records and publicly available sources of information or by using in-house or reputable third parties to profile donor's financial capability, and information about your areas of interest and potential to support the school;
- To enable assessment of bursary or financial assistance applications;
- For the purposes of management, planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as diversity);
- To enable relevant authorities to monitor the performance of the Foundation's schools and to

intervene or assist with incidents as appropriate;

- To give and receive information and references about past and current 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 Foundation;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of the Foundation's IT and communications systems in accordance with the Foundation's ICT Acceptable Use Policy;
- To make use of photographic images of pupils in Foundation publications, on the Foundation's website and (where appropriate) on the Foundation's social media channels in accordance with the Foundation's Use of Images of Pupils Policy;
- For security purposes, including CCTV and the CCTV Policy;
- To carry out or cooperate with any Foundation or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the Foundation's purposes, including to obtain appropriate professional advice and insurance for the Foundation.

In addition, the Foundation will on occasion need to process **special category personal data** (concerning health, ethnicity, religion or sexual life) in accordance with rights or duties imposed on it by law "**legal obligation**", including as regards to safeguarding 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 "**vital 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 organisers of school trips who need to be made aware of dietary or medical needs;
- To provide educational services in the context of any special educational needs of a pupil;
- As part of any Foundation or external complaints, or investigation process that involves such data, for example if there are Special Educational Needs (SEND), 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.

5. Types of Personal Data Processed by the Foundation

This will include 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);
- bank details and other financial information, e.g. about parents (or others) who pay fees to the school and any anti-money laundering information we are required to collect by law;
- 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 welfare, and contact details for their next of kin;
- references given or received by the Foundation about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- correspondence with and concerning pupils and parents past and present; and

- images of pupils (and occasionally other individuals) engaging in Foundation activities, and images captured by the Foundation's CCTV system (in accordance with the Foundation's Use of Images of Pupils Policy);

6. How the Foundation Collects Data

Generally, the Foundation receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities working with that individual).

7. Who has access to personal data and who the Foundation shares it with

For the most part, personal data collected by the school will remain within the Foundation and will be processed by appropriate individuals only in accordance with access protocols. However, some functions, particularly IT systems, are operated through externally developed, hosted or managed systems. In accordance with Data Protection Law, this type of external data processing is always subject to contractual assurances that personal data will be kept securely and used only in accordance with the Foundation's specific directions.

Occasionally, the school, including its governing body, will need to share personal information relating to its community with third parties, such as:

- Schools' Parent Teacher Associations [PTA] (if you are a parent and a member of the PTA, the Foundation may share, by agreed means, your contact details with the PTA). The PTA will be a separate data controller and the Foundation is not responsible for the PTA's processing of personal data;
- Professional advisors (eg lawyers, insurers, PR advisors, data enrichment companies and accountants);
- Travel companies, activity providers and venues including educational venues / schools (for sports, arts, music etc) when arranging trips / events abroad and in the UK;
- E learning platforms and online education tools (which allow pupils to take part in interactive activities and to allow more detailed tracking of their progress and understanding of topics);
- Appropriate contractors such as visiting music teachers;
- examination boards;
- Societies (e.g. Mensa)
- Stage 3 complaints panels which include independent panel members (occasionally the Foundation Governors will need to process parent or pupil information, such as when a complaint is raised and in accordance with the Foundation Complaints Procedure);
- Professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- Government authorities (e.g. HMRC, DfE, CAFCASS, Police or the Local Authority);
- appropriate regulatory bodies (e.g. the [Independent Schools Inspectorate](#), the Charity Commission or the Information Commissioner).
- educational institutions where pupils have informed us they are moving to, to continue their studies;
- Learning Records Service (LRS). The LRS issues Unique Learner Numbers (ULN) and creates Personal Learning records across England, Wales and Northern Ireland and is operated by the Education and Skills Funding Agency, an executive agency of the Department of Education (DfE). For more information about how your information is processed and to access your Personal Learning Record, please refer to [LRS privacy](#)

Particularly strict rules of access apply in the context of “**special category**” data most notably:

- Medical records. The Foundation needs to process such information to comply with statutory duties and to keep pupils and others safe. The Foundation will ensure only authorised staff can access information in accordance with strict protocols. However, there may be wider dissemination if needed for school trips or for catering purposes. Express consent will be sought where appropriate;
- Pastoral or safeguarding files.

In addition, a certain amount of any SEND pupil’s relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

Staff, pupils and parents are reminded that the Foundation is under duties imposed by law and statutory guidance (including [Keeping Children Safe in Education or KCSIE](#)) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as Children’s Social Services or Police. For further information about this, please view the [Foundation’s Safeguarding and Child Protection Policy](#).

KCSIE also requires that, whenever a child leaves the Foundation to join another school or college, their child protection file is promptly provided to the new organisation. The Foundation will retain a copy in accordance with the Data Retention, Storage and Disposal Policy.

8. How long we keep personal data

The Foundation will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep pupil personnel files is 25 years from the date of birth although in certain instances this may be extended to 35 years from the date of birth. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

If you have any specific queries about how our Data Retention, Storage and Disposal policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Data Protection Officer who can be contacted at dataprotectionofficer@wgsf.net. However, please bear in mind that the Foundation will often have lawful and necessary reasons to hold on to some personal data even following such a request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

9. Keeping in touch and supporting the Foundation

The Foundation will use the contact details of parents, alumni and other members of the school community to keep them updated about the activities of the Foundation, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless

the relevant individual objects, the Foundation will also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the school community, such as the Parent Teacher Associations; Old Savilians Club and In Touch – The Old Girls' Association;
- Contact 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 (e.g. charity days in support of specific causes);
- Contact parents and / or alumni for fundraising, marketing or promotional purposes and to maintain relationships with ex-pupils of the schools;
- Collect information from publicly available sources about parents' and former pupils' occupations and activities in order to maximise the Foundation's fundraising potential.

Should you wish to limit or object to any such use, or would like further information about them, please contact the Development Director, Abi Cattley acattley@wgsf.net. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the Foundation 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).

10. Your Rights

Individuals, both pupils and parents, have various rights under Data Protection Law to access and understand their own personal data held and processed by the Foundation, and in some cases ask for it to be erased or amended, or to have it transferred elsewhere, or for the Foundation to stop processing it – but subject to certain exemptions and limitations.

The Foundation 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 may take 1-2 months longer).

Rights of access, etc.

The Foundation 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 Foundation 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 Foundation 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 the right of access is limited to your own personal data, and certain data is exempt. 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 Foundation, or documents prepared in connection with a legal action).

The Foundation 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 their ordinary publication date, nor share any confidential reference held by the Foundation that was or will be given for the purposes of the education, training or employment

of any individual.

The Foundation 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 Foundation 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.

Requests by or on behalf of pupils

Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the Foundation, 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 their 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. For older pupils, the parent making the request may need to evidence their child's authority for the specific request. Requests not considered in the child's best interests may sometimes be refused.

Pupils 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.

Parental requests, etc.

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. 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 pupils without their consent. The Foundation may consider there are lawful grounds for sharing with or without reference to that pupil.

Parents will in general receive educational and pastoral updates about their children, in accordance with the Parent Contract. Where parents are separated, the Foundation will in most cases aim to provide the same information to each person with parental responsibility, but may need to factor in all the circumstances including the express wishes of the child, court orders or pastoral issues (please refer to the [Foundation's Separated Parents Policy](#))

All information requests from, on behalf of, or concerning 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: certain types of uses of images and certain types of fundraising activity. Please be aware however that the Foundation 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. a parent contract, or because a purchase of goods, services or membership of an organisation such as an alumni or parents' association has been requested).

Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates. However, the Foundation will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils – for example, under the parent contract, or via a form. Parents and pupils should be aware that this is not necessarily the same as the Foundation 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 pupil's age and understanding – to seek the pupil's consent, either alongside or in place of parental consent. 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.

In general, the Foundation will assume that pupils' consent is not required for ordinary 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. That is unless, in the Foundation's opinion, there is a good reason to do otherwise.

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 Foundation may be under an obligation to maintain confidentiality unless, in the Foundation's opinion, there is a good reason to do otherwise; for example where the Foundation believes disclosure will be in the best interests of the pupil or other pupils, or if required by law.

Pupils are required to respect the personal data and privacy of others, and to comply with the Foundation's ICT: Acceptable Use Policy and the School Rules.

11. Data Accuracy and Security

The Foundation 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 relevant school office 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 section 4 above for details of why the Foundation may need to process your data and of who you may contact if you disagree.

The Foundation 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 governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

12. This Policy

The Foundation will update this Privacy Notice annually. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

13. Queries and Complaints

Any comments or queries on this policy should be directed to the Director of Finance and Operations, Governors' House, 158 Northgate, Wakefield. WF1 3UF

If an individual believes that the Foundation has not complied with this policy or acted otherwise

than in accordance with Data Protection Law, they should utilise the [Foundation's Complaints Policy](#) and should also notify the Data Protection Officer dataprotectionofficer@wgsf.net.

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.

More information for the general public regarding guidelines on the use of personal data can be found on the website of the [For the public | ICO](#)

WGSF STAFF

PRIVACY NOTICE

In the course of your work undertaken for Wakefield Grammar School Foundation ("the Foundation"), we will collect, use and hold ("process") personal data relating to you. This makes the Foundation a data controller of your personal information, and this Privacy Notice sets out how we will use that information and what your rights are.

1. Who this document applies to

Teaching and support staff (permanent and temporary), casual/supply workers, volunteers (including Governors), contractors and self-employed coaches/instructors as well as agency staff and third party employees who may be employed or engaged by the Foundation to work for it in any capacity. It also applies to prospective applicants for roles.

Please note that any references to "employment", "staff" etc in this Notice are not intended to imply or confer any employment rights on you if you are a contractor or worker, even if the Notice is relevant to how we process your personal data.

This notice is not aimed at pupils, or parents of pupils (whether current, past or prospective) or other members of the public, nor does it inform staff how to handle the personal data of the same. This information may be found in the following documents (along with the [WGSF Data Protection Policy](#)) which provide further details about how personal data will be used by the Foundation:

- [Privacy Notice Parents and Senior Section Pupils](#)
- [Privacy Notice Junior Section Pupils](#)
- [Privacy Notice Hirers of Facilities](#)
- [Privacy Notice Visitors](#)

2. About this document

This Privacy Notice explains how the Foundation collects, uses and shares (or "processes") personal data of staff or other individuals outlined above, and your rights in relation to the personal data we hold.

This Privacy Notice also applies in addition to the Foundation's other relevant terms and conditions and policies that may, depending on your role and status, apply to you, including:

- any contract between the Foundation and its staff, such as the terms and conditions of employment, and any applicable staff handbook.
- the Foundation's CCTV Policy;
- the Foundation's Data Retention, Storage and Disposal Policy;
- the Foundation's Safeguarding and Child Protection Policy;
- the Foundation's HR policies, including but not exclusive to Discipline and Conduct, Capability, Sickness and Absence, Bullying, Harassment and Victimisation at Work Policies;
- the Foundation's Health and Safety Policy; and
- the Foundation's IT policies, including but not exclusive to the ICT Acceptable Use policy.

Please note that your contract with or engagement by the Foundation, including any document or policy forming a part of your contractual obligations to the Foundation, may in particular be relevant to and supplement the information in this Privacy Notice, to the extent that it will contain details of obligations or rights of the Foundation under contract with you which may require the use of your personal data. However, this Privacy Notice is the primary document in terms of how we notify you about the use of your personal data by the Foundation.

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

3. How we collect your information

We may collect your personal data in a number of ways, for example:

- when you submit a formal application to work for us, and provide your personal data in an application form and covering letter, etc.;
- pre-employment recruitment checks relevant to the role being undertaken with the Foundation as part of our Recruitment, Selection and Disclosure Policy and Procedure; and
- from third parties, for example the Disclosure and Barring Service (DBS) and referees (including your previous or current employers or school), or (if you are a contractor or a substitute) your own employer or agent, in order to verify details about you and/or your application to work for us.

More generally, during the course of your employment or engagement with us, we will collect data from or about you, including:

- when you provide or update your contact details;
- when you or another member of staff completes paperwork regarding your performance appraisals;
- in the course of fulfilling your employment (or equivalent) duties more generally, including by filling reports, note taking, or sending emails on Foundation systems;
- in various other ways as you interact with us during your time of employment or engagement, and afterwards, where relevant, for the various purposes set out below.

4. The types of information we collect

We may collect the following types of personal data about you (and your family members and 'next of kin', where relevant):

- contact and communications information, including:
 - your contact details (including email address(es), telephone numbers and postal address(es);
 - contact details (through various means, as above) for your family members and 'next of kin', in which case you confirm that you have the right to pass this information to us for use by the Foundation in accordance with this Privacy Notice;
 - records of communications and interactions we have had with you;
- biographical, educational and social information, including:

- o your name, title, gender, nationality and date of birth;
 - o your image and likeness, including as captured in photographs or CCTV taken for work and security purposes;
 - o details of your education and references from your institutions of study;
 - o formal identification documents including passports and driving licences
- financial information, including:
 - o your bank account number(s), name(s) and sort code(s) (used for paying your salary or invoices and processing other payments);
 - o your tax status (including residence status);
 - o information related to pensions, national insurance, or employee benefit schemes;
 - o Salary, annual leave, pension and benefits information.
 - work related information, including:
 - o details of your work history and references from your previous employer(s);
 - o right to work in the UK documentation
 - o outcomes of performance appraisals, disciplinary procedures, grievance procedures;
 - o your personal data captured in notes and correspondence you create while employed by or otherwise engaged to work for the Foundation;
 - o details of your professional activities and interests;
 - o your involvement with and membership of sector bodies and professional associations;
 - o information about your employment and professional life after leaving the Foundation, where relevant (for example, where you have asked us to keep in touch with you);
 - and any other information relevant to your employment or other engagement to work for the Foundation.

Where this is necessary for your employment or other engagement to work for us, we **may** also collect **special** categories of data, including:

- information revealing your racial or ethnic origin;
- trade union membership, where applicable;
- information concerning your health and medical conditions (for example, for teaching and pupil support staff; to ensure you are mentally and physically fit to undertake your role in line with The Education (Health Standards) (England) Regulations 2003 and [Keeping Children Safe In Education \(KCSIE\)](#); where required to monitor and record sickness absences; dietary needs; or to make reasonable adjustments to your working conditions or environment, medical reports from your GP or Occupational Health reports);
- information concerning your sexual life or orientation (for example, in the course of investigating complaints made by you or others, for example concerning discrimination); and
- information about certain criminal convictions (for example, where this is necessary for due diligence purposes, or compliance with our legal and regulatory obligations);

However, this will only be undertaken where and to the extent it is necessary for a lawful purpose in connection with your employment or other engagement to work for the school.

5. The bases for processing your personal data, how that data is used and whom it is shared with

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

(i) *Entering into, or fulfilling, our contract with you*

We process your personal data because it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, such as a contract of employment or other engagement with us. In this respect, depending on your role and status, we are likely to use your personal data for the following purposes:

- administering job applications and, where relevant, offering you a role with us;
- carrying out due diligence checks on you, whether during the application process for a role with us or during your engagement with us, including by checking references in relation to your education and your employment history;
- once you are employed or engaged by us in any capacity, for the performance of the contract of employment (or other agreement) between you and us;
- to pay you and to administer benefits (including pensions) in connection with your employment or other engagement with us;
- monitoring your attendance and your performance in your work, including in performance appraisals;
- promoting the Foundation to prospective parents and others, including by publishing the work product(s) you create while employed by or otherwise engaged to work for the Foundation;
- for disciplinary, grievance, bullying or harassment purposes, including conducting investigations and advising of outcomes where required;
- for other administrative purposes, for example to update you about changes to your terms and conditions of employment or engagement, or changes to your pension arrangements;
- for internal record-keeping, including the management of any staff feedback or complaints and incident reporting; and
- for any other reason or purpose set out in your employment or other contract with us.

(ii) *Legitimate Interests*

We process your personal data because it is necessary for our (or sometimes a third party's) legitimate interests. Our "legitimate interests" include our interests in running the Foundation in a professional, sustainable manner, in accordance with all relevant ethical, educational, charitable, legal and regulatory duties and requirements (whether or not connected directly to data protection law). In this respect, depending on your role and status, we are likely to use your personal data for the following:

- providing you with information about us and what it is like to work for us (where you have asked for this, most obviously before you have made a formal application to work for us);
- for security purposes, including by operating CCTV cameras in various locations on the Foundation's premises;

- to enable relevant authorities to monitor the Foundation's performance and to intervene or assist with incidents as appropriate;
- to provide education services to pupils;
- to safeguard pupils' welfare and provide appropriate pastoral care;
- to carry out or cooperate with any Foundation or external complaints, disciplinary or investigatory process;
- for the purposes of management planning and forecasting, research and statistical analysis;
- in connection with organising events and social engagements for staff;
- making travel arrangements on your behalf, where required;
- contacting you or your family members and 'next of kin' for business continuity purposes, to confirm your absence from work, etc. (for example, where you have not informed the school or relevant person of your absence);
- publishing your image and likeness in connection with your employment or engagement with us;
- to monitor (as appropriate) use of the Foundation's ICT and communications systems in accordance with the Foundation's ICT: Acceptable Use Policy; Bring Your Own Device Policy and statutory guidance such as KCSIE.

(iii) **Legal Obligations**

We also process your personal data for our compliance with our legal obligations, notably those in connection with employment, charity / company law, tax law and accounting, and child welfare. In this respect, depending on your role and status, we are likely to use your personal data for the following:

- to meet our legal obligations (for example, relating to child welfare, social protection, diversity, equality, and gender pay gap monitoring, employment, and health and safety);
- for tax and accounting purposes, including transferring personal data to HM Revenue and Customs to ensure that you have paid appropriate amounts of tax where relevant;
- for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

(iv) **Special categories of data**

Depending on your role and status, we process special categories of personal data (such as data concerning health, religious beliefs, racial or ethnic origin, sexual orientation or union membership) or criminal convictions and allegations for the reasons set out below.

We will process this data on the basis that such processing is necessary to carry out obligations and exercise rights (both yours and ours) in relation to your employment or engagement.

In particular, we process the following types of special category personal data for the following reasons:

- your physical or mental health or condition(s) in order to record sick leave and take decisions about your fitness for work, or (in emergencies) act on any medical needs you may have;
- trade union membership, in connection with your rights as an employee, agent or contractor and our obligations as an employer or engager of your services;
- categories of your personal data which are relevant to investigating complaints made by you or others, for example concerning discrimination, bullying or harassment;
- data about any criminal convictions or offences committed by you, for example when conducting criminal background checks with the Disclosure and Barring Service (DBS), or where it is necessary to record or report an allegation (including to police or other authorities, with or without reference to you);

We will process special categories of personal data for lawful reasons only, including because:

- you have given us your explicit consent to do so, in circumstances where consent is appropriate;
- it is necessary to protect your or another person's vital interests, for example, where you have a life-threatening accident or illness in the workplace and we have to process your personal data in order to ensure you receive appropriate medical attention;
- it is necessary for some function in the substantial public interest, including the safeguarding of children or vulnerable people, or as part of a process designed to protect others from malpractice, incompetence or unfitness in a role (or to establish the truth of any such allegations); or
- it is necessary for the establishment, exercise or defence of legal claims, such as where any person has brought a claim or serious complaint against us or you.

6. Sharing your information with others

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. We may disclose limited personal data (including in limited cases special category or criminal data) to a variety of recipients including:

- other employees, agents and contractors (for example, third parties processing data on our behalf as part of the provision of benefits including pensions, ICT etc. – although this is not sharing your data in a legal sense, as these are considered data processors on our behalf);
- DBS and other relevant authorities and agencies such as the Department for Education, Teacher Regulation Agency, the ICO, Charity Commission and the local authority;
- external auditors or inspectors;
- our advisers where it is necessary for us to obtain their advice or assistance, including insurers, solicitors, accountants, or other external consultants;
- when the Foundation is legally required to do so (by a court order, government body, law enforcement agency or other authority of competent jurisdiction), for example HM Revenue and Customs or police;
- where you have consented, the Foundation will share some personal data with agreed third parties (for example requests from rental companies or banks/building societies for mortgage information regarding salary and employment status).

We may also share information about you with other employers in the form of a reference, where we consider it appropriate, or if we are required to do so in compliance with our legal obligations. References given or received in confidence may not be accessible under your GDPR rights.

7. How long your information is kept

Subject to any other notices that we may provide to you, we may retain your personal data for a period of the current year plus 7 years after your contract has expired or been terminated.

However, some information may be retained for longer than this, for example incident reports and safeguarding files, in accordance with specific legal requirements. Please see our [Data Retention, Storage and Disposal policy](#).

8. Cross Border Transfers

We do not transfer your personal information to third parties outside the EEA.

9. Data Security

All information you provide to us is stored on our secure servers and/or locked filing cabinets (with restricted access). We have implemented appropriate physical, technical, and organisational security measures designed to secure your personal data against accidental loss and unauthorised access, use, alteration or disclosure. In addition, we limit access to personal data to those employees, agents, contractors and other third parties that have a legitimate business need for such access.

10. Your Rights

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the Data Protection Officer who can be contacted at dataprotectionofficer@wgsf.co.uk

Please note the above rights are not absolute and we may be entitled to refuse requests where exceptions apply. The Foundation will endeavour to respond to any such 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.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

In some circumstances we may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Officer who can be contacted at dataprotectionofficer@wgsf.co.uk. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

You can find out more about your rights under applicable data protection legislation from the Information Commissioner's Office website available at www.ico.org.uk.

11. This Notice

The Foundation will review this Privacy Notice annually. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

12. Contact and Complaints

If you have any queries about this Privacy Notice or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you may contact the Data protection Officer who can be contacted at dataprotectionofficer@wgsf.co.uk.

If you are not satisfied with how we deal with your complaint, you can make a complaint to the Information Commissioner: www.ico.org.uk. However, the ICO does recommend you seek to resolve any issues with the data controller initially prior to any referral.

Policies can be downloaded by following the link [Policies - Wakefield Grammar School Foundation](#)

WGSF VISITORS

PRIVACY NOTICE

Introduction - who we are

Wakefield Grammar School Foundation (WGSF) is a Registered Charity (Charity number 1088415) and a Company Limited by Guarantee (company number 4258359 registered in England) with its registered office at 158 Northgate, Wakefield, WF1 3UF.

W.I.S. (Education) Ltd is a subsidiary of Wakefield Grammar School Foundation.

WGSF is the data controller of the personal information you provide to us and is committed to ensuring that the personal data of all visitors and members of the general public is handled in accordance with the principles set out in the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

The Director of Finance and Operations acts as a representative for the Foundation with regard to its data controller responsibilities; they can be contacted at the registered office at 158 Northgate, Wakefield WF1 3UF.

What information might we collect or process?

When you visit the school or its premises or attend our events we may collect, store, and process the following categories of personal data about you: personal contact details such as name, title, addresses, telephone numbers, and email addresses; and potentially: car registration details; emergency contact information; copies of identification documents; bank account details; health and medical information; dietary requirements, information about disabilities you may have and other personal details included in written communications, or other information that you might provide to us.

We may also collect and process images such as CCTV images, video and photographic images.

Why do we collect or process your information?

The purposes of our holding this information are to manage visitors and events, to fulfil our legal obligations (e.g. health and safety legislation), to prevent or detect unlawful acts, ensure equality of treatment, and to process payments for goods or services purchased from us.

Website visitor data storage

When you visit our website we currently record your IP address. The data is kept for a short period of time as it is on a rolling deletion (usually this equates to holding approximately 1 day of visitor IP addresses to our site before being deleted). Some trusted third parties on our site may also collect visitor IP addresses.

What reason do we have for processing your data?

Most processing is based on our legitimate interests in running a business and fulfilling orders/requests. The amount of personal information shared within WGSF will be no more than is reasonably necessary.

Who might we share your data with and how long will we keep your data?

The Foundation will hold your personal data only as long as is necessary for the purposes it was collected for. The Foundation has a Data Retention Schedule which outlines how long different data is held (please visit the website [here](#)). We may disclose personal data about you to various third parties including:

- service providers (e.g. caterers, ticketing providers, database/website/email service providers);
- the press and media;
- our business/professional advisers; and in some circumstances:
- the emergency services, health and safety executive and similar organisations.

We will not disclose personal data without a good reason and a lawful basis.

Your rights

GDPR provides rights for data subjects which include: the right of access to and rectification or erasure of personal data or restriction of processing or to object to processing as well as the right to data portability. Where processing is based on consent you have a right to withdraw that consent at any time. You also have the right to make a complaint to the Information Commissioner's office about any aspect of how we are handling your data.

If you would like to exercise any of these rights, please contact the school's Data Protection Officer, Vicky Weeks, dataprotectionofficer@wgsf.net.

WGSF HIRERS OF FACILITIES

PRIVACY NOTICE

1. Introduction - who we are

Wakefield Grammar School Foundation (WGSF) is a Registered Charity (Charity number 1088415) and a Company Limited by Guarantee (company number 4258359 registered in England) with its registered office at 158 Northgate, Wakefield, WF1 3UF.

W.I.S. (Education) Ltd is a subsidiary of Wakefield Grammar School Foundation.

WGSF is the data controller of the personal information you provide to us. This means the Foundation determines the purposes for which, and the manner in which, any personal data is to be processed. The Director of Finance and Operations acts as a representative for the Foundation with regard to its data controller responsibilities; they can be contacted at the registered office at 158 Northgate, Wakefield WF1 3UF.

2. The Purpose of this Privacy Notice

This policy is intended to provide information about how the Foundation will use (or "process") personal data about individuals including people who hire out its facilities.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used.

Please read this Privacy Notice and understand the Foundation's obligations to its entire community.

This Privacy Notice applies alongside any other information the Foundation 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 Foundation's other relevant terms and conditions and policies, including:

- any contract between the Foundation and the hirer;
- [WGSF CCTV policy](#);
- [WGSF Data Protection Policy](#);
- [WGSF Data Retention, Storage and Disposal policy](#)
- [WGSF Health and Safety policies](#), including as to how concerns or incidents are recorded;

3. Responsibility for data protection

The Foundation has appointed a Data Protection Officer who will deal with all requests and enquiries concerning the Foundation's uses of personal data (see section 10 on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law.

The Data Protection Officer can be contacted at dataprotectionofficer@wgsf.co.uk.

4. Why the Foundation needs to process personal data

In order to carry out its ordinary duties to hirers of facilities, the Foundation needs to process a range of personal data about individuals as part of its daily operation.

Some of this activity the Foundation will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a “**contract**” with its hirers of facilities.

Other uses of personal data will be made in accordance with the Foundation'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 Foundation expects that the following uses will fall within that category of its (or its community's) “**legitimate interests**”:

- Maintaining relationships with the school community, including direct marketing;
- For security purposes, including CCTV in accordance with the Foundation's CCTV policy;
- To carry out or cooperate with any Foundation or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the Foundation's purposes, including to obtain appropriate professional advice and insurance for the Foundation.

5. Types of personal data processed by the Foundation

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details; and
- images captured by the Foundation's CCTV system;

6. How the Foundation Collects Data

Generally, the Foundation 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).

7. Who has access to personal data and who the Foundation shares it with

Occasionally, the school will need to share personal information relating to its community with third parties, such as:

- professional advisers (e.g. solicitors, insurers, PR advisers and accountants);
- government authorities (e.g. HMRC, DfE);

For the most part, personal data collected by the school will remain within the Foundation, and will be processed by appropriate individuals only in accordance with access protocols.

Finally, in accordance with Data Protection Law, some of the Foundation's processing activity is carried out on its behalf by third parties, such as IT systems which are operated through externally developed, hosted or managed systems. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the school's specific directions.

8. How long we keep personal data

The Foundation will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, personal data relating to the hirers of facilities is processed for the duration of the period of hire. It is then archived and retained in accordance with our WGSF Data Retention, Storage and Disposal policy.

If you have any specific queries about how our Data Retention and Storage Policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for

erasure, please contact the Data Protection Officer who can be contacted at dataprotectionofficer@wgsf.co.uk. However, please bear in mind that the Foundation will often have lawful and necessary reasons to hold on to some personal data even following such a request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

9. Your rights

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

9.1 Rights of access

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the Data Protection Officer who can be contacted at dataprotectionofficer@wgsf.co.uk

The Foundation 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 one month in the case of requests for access to information).

The Foundation 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 Foundation may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

9.2 Requests that cannot be fulfilled

You should be aware that the right of access is limited to your own personal data, 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 Foundation, 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 personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

9.3 Consent

Where the School is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Please be aware however that the Foundation 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.

9.4 Whose rights?

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

10. **Data accuracy and security**

The Foundation 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 Foundation/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 section 4 above for details of why the Foundation may need to process your data and of who you may contact if you disagree.

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

11. **This Policy**

The Foundation will review this Privacy Notice annually. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

12. **Queries and complaints**

Any comments or queries on this policy should be directed to the Director of Finance and Operations, Governors' House, 158 Northgate, Wakefield. WF1 3UF

If an individual believes that the Foundation has not complied with this Privacy Notice or acted otherwise than in accordance with Data Protection Law, they should utilise the Foundation complaints procedure and should also notify the Data Protection Officer. 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.

Policies can be downloaded by following the link [Policies - Wakefield Grammar School Foundation](#)

More information for the general public regarding guidelines on the use of personal data can be found on the website of the Information Commissioner's Office (ICO) [For the public | ICO](#).

WGSF DEVELOPMENT, ALUMNI, ARCHIVES AND EVENTS

PRIVACY NOTICE

1. Introduction - who we are

Wakefield Grammar School Foundation is a Registered Charity (Charity number 1088415) and a Company Limited by Guarantee (company number 4258359 registered in England) with its registered office at 158 Northgate, Wakefield, WF1 3UF.

Wakefield Grammar School Foundation (WGSF), referred to as 'the Foundation', is a family of single-sex independent day schools incorporating Queen Elizabeth Grammar School (QEGS), Wakefield Girls' High School (WGHS) and a co-educational Wakefield Grammar Pre-Prep School (WGPPS) delivering education to children aged 3 - 18.

Wakefield Grammar School Foundation is the data controller of the personal information you provide to us. This means the Foundation determines the purposes for which, and the manner in which, any personal data relating to alumni, their parents, Governors and staff. The Director of Finance and Operations acts as a representative for the Foundation with regard to its data controller responsibilities; they can be contacted at the registered office.

Links to other policies

This Privacy Notice should be read in conjunction with the following (all available on the WGSF website):

[WGSF Data Protection Policy](#)

[WGSF Data Retention and Storage Policy](#)

[WGSF Privacy Notices](#)

[WGSF Gift Acceptance Policy and Code of Ethical Fundraising Practice](#)

2. Purpose of this Privacy Notice

The WGSF Development Office exists to maintain and grow a lifelong, mutually beneficial relationship between the Schools of the Foundation and its alumni, supporters and friends.

Our alumni and supporters are extremely important to us, and this Privacy Notice explains how the Development Office, on behalf of the Foundation, collects, stores, manages and protects your data. It outlines the types of data that we hold and how we use data to provide services to our alumni and supporters to enable us to keep you informed about the Schools and provide opportunities for you to continue to be involved in the life and activities of the Schools. We aim to be clear when we collect your personal information, and not do anything you would not reasonably expect.

Your data is stored securely and in accordance with the UK data protection law. We never sell your information.

This privacy notice is supplementary to the Foundation's Privacy Notices and applies specifically to information held about alumni, supporters and friends of the WGSF by the Development Office.

3. Our responsibilities and legal basis for processing your data

As part of our work we process and store personal information relating to students, staff, alumni,

parents, past parents, current and potential supporters and friends of the Foundation and we therefore adhere to UK data protection Law.

The Development Office, on behalf of the Foundation, processes the information outlined in this Privacy Notice in pursuit of our legitimate interests in:

- Communicating with and providing benefits and services to alumni, staff, parents, former parents, Governors and former Governors and current and potential supporters;
- Furthering the Foundation's educational charitable mission, which includes fundraising and securing the support of volunteers.

We may pursue these legitimate interests by contacting you by telephone, email, post or social media. Information about how you can manage the ways that we contact you is outlined in the 'Your Rights' section below.

Whilst the Development Office relies on legitimate interest as the legal basis for processing where this is not overridden by your interests and rights, it recognises that this is not the only lawful ground for processing data. As such, where appropriate the Development Office will sometimes process your data on an alternative legal basis – for example, because you have given us consent to do so i.e. the e-newsletter sent out by email.

4. The data we hold

The Development Office, on behalf of the Foundation, maintains a record of all former students, their parents, staff and Governors of the Foundation. At the point of leaving, basic biographical information including names, titles, gender, date of birth, contact details (email and mailing address and phone numbers) from the School system or year book are used to create a record for you in the Alumni Database (known as [WGHSInTouch](#) for girls and [QEGSONLINE](#) for boys). We also create a record for any non-alumni donors, parents and friends who wish to receive our information.

We hold your data for an unlimited period as long as the Foundation believes that it has a relationship with you. We actively collect and maintain information in our archives which directly relates to the history of the schools, their alumni, teachers and governors.

Initially, contact information about pupils, and their parents, is transferred into the Development Office's database from the Schools' pupil management systems. During the pupils' time at the Schools, this information is maintained for accuracy, and augmented periodically by liaison with other departments of the School, where this is relevant to the work of the Development Office. Immediately prior to their departure from the School, consent is sought from all Year 13 pupils for the Development Office to sustain contact with them once they become Alumni, with their preferences then actioned accordingly.

Data about Alumni has also been collated from historic pupil records kept by the Schools, from records previously held by the Old Savilians' and Old Girls' Associations, and from information held in the Schools' Archives. The Development Office works consistently to ensure that the data it holds, particularly contact information, is accurate and up-to-date. As a result, it may also obtain information about individuals from publicly available sources such as the the Royal Mail's National Change of Address database (NCOA), LinkedIn and other social media channels, and will use this to update its records as appropriate.

Year 13 Leavers' information is published each year in Leavers' books and is therefore considered to be in the public domain. If we become aware that your name has changed we will update our records to reflect this. In subsequent instances where we provide your name (e.g. a class list) we will use your current name alongside any previous names (such as your maiden name) to ensure you can be identified correctly.

We update our records when you enquire about our services, register for events, make a donation, complete an update form or provide us with information. Our alumni and supporters will have provided the majority of information we store and process. We may also update your record with information we may obtain from other sources, which may include:

- An individual's name, title, maiden name (where applicable), gender and date of birth
- An individual's contact details including postal address, email address, phone number and links to social media accounts
- Registration booking details and attendance at events
- Dietary requirements and access requirements in respect of events you have registered to attend. This data is held to ensure that we complete our duty of care to you
- When you volunteer your services to us, such as mentoring or careers lectures
- Information about your time at the Foundation
- Information you have chosen to share via online services such as LinkedIn and Facebook and our alumni databases (WGHSInTouch or OldSavsOnline)
- Your occupation and professional activities; whether you wish to volunteer to share your professional expertise or become a mentor as part of our career development programme
- Your recreations and interests;
- Information about an individual's connections to school, including family connections and relationships with other alumni, supporters and friends
- Records of donations and Gift Aid status, where applicable (as required by HMRC);
- Records of communications sent to you by the Development Office or schools or received from you;
- Information about an individual's wealth
- Information from the internet and publicly available sources such as extracts from media stories, LinkedIn, social media, Companies House.

We aim to keep your data up to date and accurate and we welcome any updates to your details you may wish to provide.

The Foundation's alumni portals, WGHS IN Touch [Wakefield Girls High School In Touch](#) and Old Savs Online [QEGS Wakefield Online Community](#) are hosted by Potentiality who is contractually bound to provide this service to the Foundation, our alumni and supporters. Our alumni portals allow users to update their details online, access a directory of Foundation alumni and register to attend events.

Tools may be used to help us improve the effectiveness of the Foundation's communications with you, including tracking whether the emails we send are opened and which links are clicked within a message.

Although most of the information we store and process stays within the UK, some information may be transferred to countries outside the European Economic Area (EEA). This may occur if, for example, one of our trusted partners' servers are located in a country outside the EEA. Where these countries do not have similar data protection laws to the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law.

5. How we use your data

5.1 Keeping in touch and supporting the Schools

We use your information to keep you informed about the Schools, the alumni community, which includes former pupils, former staff and former parents, and to provide opportunities for you to continue to be involved in the life and activities of the alumni community and Schools. This includes providing you with services you have requested, for administration purposes and to further our charitable and educational aims including fundraising, volunteering, event invitations, newsletters and the alumni magazines.

We want to send you timely, relevant and appropriate messages via mail, email and telephone. To do this we may segment our communications based on demographic, geographical and educational information. For example, we may send invitations to our London events to those with postcodes within that locale.

We may text you to confirm an event booking or advise changes to events. Our communications and marketing activities may encompass the following and may be sent by mail, email, telephone, text and social media:

- Sending alumni and school publications;
- Notification of alumni and school events;
- Notification of fundraising programmes;
- Promotion of alumni and student mentoring and career services and requesting assistance from our alumni and supporters in respect of our careers initiatives

The Development Office may use analytics tools to help improve the effectiveness of its communications, for example by tracking email open and click-through rates. The Development Office also monitors usage of the QEGSONLINE & WGHS In Touch Alumni platforms, including user numbers, and analysis of those users who have offered their professional assistance to pupils and fellow Alumni.

5.2 Fundraising

Fundraising is very important for the Schools. The Schools were founded with the help of philanthropic support and we continue this tradition of giving through our fundraising campaigns which provide additional resources to help teaching, and supporting the life of our students.

We want to keep you informed about our fundraising in the most appropriate and cost effective ways. To help us do this we may carry out analysis and segmentation of the information we hold and add publicly available information, such as information from Companies House, electoral register, Zoopla and reputable print and social media. This may include wealth screening. We undertake due diligence for potential donors in line with the [Foundation's Donation Acceptance, Sponsorship and Ethical Fundraising Policy](#). These processes help us to better understand your interests, preferences and the type and level of donation you may be interested in giving. This allows us to make appropriate requests to our supporters about fundraising and volunteering in the most effective ways.

Our fundraising campaigns are managed in-house by permanent Development Office staff and may include direct mail (both postal and electronic), social media, telephone and face-to-face visits. Our telephone fundraising is managed in-house by Development Office staff and employs current students to contact alumni and friends of the Schools. This provides paid employment opportunities for our students as well as valuable work experience. All of our staff and student workers are well trained and are taught to respond sensitively and appropriately, to anyone who may appear vulnerable.

We are very grateful for the support of our donors and we like to publish their names on our donor roll to recognise their support and to encourage others to donate. If you donate to the Schools and do not wish your donation to be publicly recognised, you can choose to donate anonymously. This means we will record your donation on our systems, but will not publicly acknowledge or publish

your name on donor lists or other stewardship materials both online and in written publications. We like to publish case studies online and in our magazines, and will always ask for consent from people involved in the case stories before publication.

5.3. Research and Wealth screening

As a fundraising organisation, we undertake in-house research and from time to time engage specialist researchers to gather information about you from publicly available sources, for example, Companies House, the Electoral Register, company websites, 'rich lists', social networks such as LinkedIn, political and property registers and news archives.

We may also carry out wealth screening to fast track the research using our trusted third party partners. You will always have the right to opt out of this processing. We may also carry out research using publicly available information to identify individuals who may have an affinity to our cause but with whom we are not already in touch. This may include people connected to our current major supporters, trustees or other lead volunteers. We also use publicly available sources to carry out due diligence on donors in line with our Gift Acceptance Policy and Code of Ethical Fundraising Practice and to meet money laundering regulations.

This research helps us to understand more about you as an individual so we can focus conversations we have with you about fundraising and volunteering in the most effective way, and ensure that we provide you with an experience as a donor or potential donor which is appropriate for you.

If you would prefer us not to use your data in this way, please email us at developmentoffice@wgsf.net or call us on 01924 373943

The Development Office is committed to working in a transparent, ethical and responsible way. The Foundation is registered with the Fundraising Regulator and is committed to the Regulator's Code of Practice.

5.4 Checking your Address

We know from the returned mail we receive that people sometimes move house and forget to tell us. Periodically, we may therefore send the names and addresses of those from whom we have had no contact in recent years, to a data screening company which uses publicly available information to check addresses. Where there appears to be a change, we will contact you to check the information. If we are unable to verify your details with you, we may decide to cease postal communications until we can make contact. Our aim is always to be in touch with those who wish to hear from us.

5.5 Archive

The Foundation's archive is maintained as an historical resource and record to help inspire and equip current staff and pupils to understand and appreciate issues of identity, belonging and shared heritage; to prompt memories of school life among many generations of Old Savillians and Old Girls and to serve as a research resource for all interested in the history of Queen Elizabeth Grammar School and Wakefield Girls' High School.

6. Who your data is shared with

Your data is stored securely with access restricted to designated members of staff. We will never sell your information. We will never pass information to third parties except in the following cases:

- We may use external service providers as data processors / agents on our behalf, to help provide benefits and services. These include email services to send emails and newsletters; mailing houses to print and send out postal mail and magazines, and companies to screen names and addresses to help keep addresses up to date, provide wealth screening, demographic and publicly available information and to check data against preference services.
- Governors who are working with the Development Office, for example when consulting with Alumni.
- Volunteers who share an interest in promoting alumni or School fundraising activities, such as those who run our alumni or fundraising groups, including but not limited to:
 - The Old Savilians Club Council
 - The Friends of Wakefield Grammar School
 - PTA Organisations
- We may need to disclose your information if required to do so by law
- If we have obtained your permission to do so

We always make sure there are appropriate controls in place regarding how the above handle your data and to ensure they never use the data for non-Foundation purposes.

7. Your rights

The Foundation considers its relationship with its alumni and supporters to be lifelong, and we will hold your details until you tell us you no longer wish to hear from us. We will always try to ensure that the data we hold for you are up to date, reasonable and not excessive. You will always have the right to:

- Be informed as to how we use your data (via this Privacy Notice);
- Access or request a copy of the data we hold about you;
- Update, amend or rectify the data we hold about you – you can manage your own data at WGHS In Touch [WGHS In Touch Online Community](#) and Old Savs Online [QEGS Wakefield Online Community](#)
- Change your communication preferences at any time to restrict how we process your data and communicate with you. Email developmentoffice@wgsf.net
- Ask us to remove your data from our records;
- Withdraw consent, where it is used as a legal basis for processing;
- Object to or restrict the processing of your information for any of the purposes outlined above.

However, we will retain the following details of former students; staff and Governors as part of our historical archive records:-

- Name
- Date of birth
- Dates attended school

Additionally, we will retain details of all donations, legacies and gifts made to us.

If you have a concern about the way that Wakefield Grammar School Foundation is collecting or using your personal data, in the first instance, please contact us.

You can email dataprotectionofficer@wgsf.co.uk telephone 01924 231625 You

can also write to us:-

Data Protection Officer
Governors' House
158 Northgate
Wakefield
WF1 3UF

You may also raise a concern with the [Information Commissioner's Office](#). The ICO can be contacted on 0303 123 1113 Monday- Friday 9am-5pm.

This Privacy Notice

The Foundation will update this Privacy Notice from time to time. A copy will be available on our website [Policies - Wakefield Grammar School Foundation](#). Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.