



Wakefield Grammar School Foundation

PRIVACY NOTICE – HIRERS OF FACILITIES

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Consultation	
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CHANGE RECORD - REVIEW PERIOD YEARLY

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WGSF PRIVACY NOTICE - HIRERS OF FACILITIES

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 Retention, Storage and Disposal policy](#); and
- [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. lawyers, 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](#).