



WATFORD GRAMMAR SCHOOL FOR GIRLS

Headmistress: Miss Sylvia Tai BA (Hons)

PRIVACY NOTICE FOR VISITORS TO THE SCHOOL

Watford Grammar School for Girls is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you as a visitor to our site, in accordance with the UK General Data Protection Regulation (GDPR).

Watford Grammar School for Girls is an Academy Trust school, company number 07348254, registered office at Lady's Close, Watford, WD18 0AE, registered as a company in England and Wales, and an exempt charity. We are well known for our rich academic curriculum, our strong and supportive pastoral care, and the wide range of extended activities that, taken as a whole, educate, encourage and empower our girls. The school motto is *Sperate Parati* - or 'Go forward with preparation' - which encapsulates our aim for every member of the school community.

We are proud of the strong academic traditions and the importance of service to others that have shaped the ethos of our school since its foundation by Elizabeth Fuller in 1704. We value hard work and nurture scholarship, always encouraging our girls to achieve excellence in all fields of study. The girls have the opportunity to excel at music, drama and sport, as well as to play an active role in the wider community by taking part in many charitable activities. Thus they learn to be their best selves: hard working, compassionate and high achieving in all areas of life.

We are a diverse and thriving community, founded on consideration, toleration and trust. Each girl is given opportunities to develop confidence and resilience both in and outside the classroom, and to develop a sense of personal responsibility that is best summarised in the maxim 'I can do it, and I will do it' - words which every member of the school learns and takes to heart.

As part of ensuring the effective running of our school it is essential that we hold and use data and information about parents/carers, pupils, staff, governors/trustees, site visitors and others with whom we have relationships. It is important to us that we do this professionally and in line with our statutory, moral and contractual obligations, and this notice is part of how we explain how we do this. Legally the school is a Data Controller under the Data Protection Act 2018 / the UK General Data Protection Regulation. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. The responsible officer at the school is Michael Lewis who is Data Protection Officer (DPO).



DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

THE TYPE OF INFORMATION WE HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. We lawfully do this as permitted under Article 6 of the UK General Data Protection Regulation. It does not include data where the identity has been removed (anonymous data).

There are special categories of more sensitive personal data which require a higher level of protection. Please see our Data Protection Policy for a definition of sensitive personal data.

We will collect, store, and use the following categories of personal information about you as a visitor to our site:

- You name and other contact details, for example mobile phone number, email address, postal address
- A photo of you
- The Registration Number of the vehicle you arrived in, if parked on site
- Information about the time you arrived at and left our site

If, while on site, you also connect to our School wireless network, we will also record:

- The device name used to access the network
- MAC [Media Access Control] address
- Details of web browsing activity (for example URLs, search terms, bandwidth used)
- The IP address assigned for your access



We would not routinely collect, store or use sensitive personal data (as defined in our Data Protection Policy) under article 9 of the UK General Data Protection Regulation for visitors to our site. However, if you are visiting as a parent/carer, potential employee, or in some other capacity with a relationship to the School, another of our Privacy Notices may apply which could cover sensitive personal data.

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect most visitor information through our sign in system, Inventry. We collect information about any use you make of our wireless network through our web provider's filtering solution.

HOW WE WILL USE INFORMATION ABOUT YOU

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- (a) Where we need to comply with a legal obligation;
- (b) Where we need to protect your interests (or someone else's interests);
- (c) Where it is needed in the public interest or for official purposes;
- (d) Where we have your consent.

We do not generally process personal data on the 'legitimate interests' basis allowed for under the UK GDPR. If we do ever do this, we will carry out a Legitimate Interests Assessment first in line with the requirements of the Information Commissioner's Office, and only use this basis should it be justified under that Assessment. See our Data Protection Policy for further information.

SITUATIONS IN WHICH WE WILL USE YOUR PERSONAL INFORMATION

Situations in which we will process your personal information include the following principal processes:

- To manage access to our site and make sure we know who is on site at any one time, to comply with our Safeguarding and Health and Safety responsibilities and to maintain the security of our site
- For data associated with wifi access, we use this information to provide you with the wifi network service, to ensure network security and comply with our Safeguarding responsibilities

Some grounds for processing will overlap and there may be multiple grounds which justify our use of your personal information.

In addition, the School also uses CCTV cameras around the school site for security purposes and for the protection of staff and pupils. CCTV footage may be referred to during the course of disciplinary procedures (for staff or pupils) or to investigate other issues. CCTV footage involving visitors to our site will only be processed to the extent that it is lawful to do so. Please see our CCTV policy for more details.

If you fail to provide personal information



If you fail to provide certain information when requested, we may be prevented from complying with our legal obligations (such as to discharge our safeguarding obligations) or we may be unable to discharge our obligations which may be in the public interest or for official purposes.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose or required or permitted by law. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

Special categories of particularly sensitive personal data require us to ensure higher levels of data protection. Sensitive personal data is defined in our Data Protection Policy. We need to have further justification for collecting, storing and using this type of personal information. We may process sensitive personal data under Article 9 of the UK General Data Protection Regulation in the following circumstances:

- (a) In limited circumstances, with your explicit written consent;
- (b) Where we need to carry out our legal obligations and in line with our Data Protection Policy;
- (c) Where it is needed in the public interest and in line with our Data Protection Policy;

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

As noted above, we do not generally process this type of information for visitors to our site, but may do under one of our other Privacy Notices if you have a wider relationship with the School.

Do we need your consent?

We do not need your consent if we use your sensitive personal data as permitted by law and in accordance with our written policy where processing is necessary:

- for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
- for reasons of substantial public interest, on the basis of one of 23 specific substantial public interest conditions set out in Part 2 of Schedule 1 of the Data Protection Act 2018, which shall be proportionate to the aim pursued, where we



respect the essence of the right to data protection and where we provide for suitable and specific measures to safeguard your fundamental rights.

In limited circumstances, we may approach you for your written consent to allow us to process certain sensitive personal data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. We will document your decision as to whether you consent to our processing this data or not.

INFORMATION ABOUT CRIMINAL CONVICTIONS

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our Data Protection Policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We would not routinely hold this kind of information about visitors to our site.

AUTOMATED DECISION-MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- (a) Where we have notified you of the decision and given you 21 days to request a reconsideration.
- (b) In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

DATA SHARING

We may have to share your data with third parties, including third-party service providers and other organisations.



We require third parties to respect the security of your data and to treat it in accordance with the law. Some of the organisations referred to above are joint data controllers. This means we are all responsible to you for how we process your data.

We may transfer your personal information outside the UK/EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Why might we share your personal information with third parties?

We will share your personal information with third parties where required by law, where it is needed in the public interest or for official purposes or where we have your consent – for example if the third party provides a service to the school.

Which third-party service providers process your personal information?

“Third parties” includes third-party service providers (including contractors and designated agents). The following third-party service provider is used:

- Inventry – for access services to the School site

How secure is your information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Freedom of Information Act

From time to time, we may disclose your personal data in response to a request for information pursuant to the Freedom of Information Act 2000 or following a data subject access request. We may approach you for your consent but, in any event, we will only disclose your personal data if we are satisfied that it is reasonable to do so in all the circumstances. This means that we may refuse to disclose some or all of your personal data following receipt of such a request.

Transferring information outside the UK

Data stored electronically may be saved on a cloud based system which may be hosted in overseas, including outside of the UK. If this happens we will take steps to ensure the data is managed and protected as if it were covered by the same protections which apply in the UK.

Personal data may be transferred to other countries, for specific essential purposes - if, for example, you are supporting a school trip overseas. Appropriate steps will be taken to keep the data secure.

DATA SECURITY

We have put in place measures to protect the security of your information. Details of these measures are available in our Information Security policy which can be obtained from the Data Protection Officer, Michael Lewis.



Third parties who are processing personal data on our behalf will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Data Protection Officer, Michael Lewis.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

DATA RETENTION

How long will we use your information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, insurance or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. We do this in line with the best practice promoted by appropriate professional bodies, and currently follow the data retention guidelines in the Information and Records Management Society (www.irms.org.uk) Toolkit for Schools. Further details of retention periods for different aspects of your personal information are available in our Data Retention Policy, and a copy of this can be obtained from the Data Protection Officer upon request.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a governor / trustee of the school / trust we will retain and securely destroy your personal information in accordance with our Data Retention Policy. If you later take up a role (for example a voluntary role) at the school, we will collect and use your information as appropriate for that role.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please let us know the most up to date information you have.

Your rights in connection with personal information

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

- **Request access** to your personal information (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.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer, Michael Lewis, in writing.

The legal timescale for the school to respond to a Subject Access Request is one calendar month. As the school has limited staff resources outside of term time, we encourage you to submit any Subject Access Requests during term time and to avoid sending a request during periods when the School is closed or is about to close for the holidays where possible. This will assist us in responding to your request as promptly as possible. For further information about how we handle Subject Access Requests, please see our Data Protection Policy.

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 manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

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. 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.

DATA PROTECTION OFFICER

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO, Michael Lewis, via the school.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.