

The Willows School Academy Trust

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Learning, Achieving, Succeeding

Data Protection Policy

Reviewed: September 2024

Next Review: September 2025

Data Protection Policy (GDPR)

General Data Protection Regulation Privacy Notice

This notice is designed to conform to the General Data Protection Regulation (EU 2016/679) and the UK General Data Protection Act 2018. We will refer to this as Data Protection Law.

Who to contact

The Headteacher, Mr. Malcolm Shaw, is our named individual responsible for data protection. If you have a question, issue or wish to change the way we currently use your data please contact Mr. Shaw through the school office.

What we do with your data

This privacy notice is intended to provide information about how we will use (or “process”) personal data about individuals including: its current, former and prospective staff; its current, past and prospective pupils; their parents, carers or guardians (referred to in this document as “parents”); suppliers of goods and services to the School; and any other members of the School Community.

This information is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used. All members of the School Community are all encouraged to read this Privacy Notice and understand the School’s obligations to its entire community.

This Privacy Notice applies alongside any other information we may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Notice applies in addition to our other relevant terms, conditions and policies. These include but are not limited to:

- any contract between the School and its staff or the parents of pupils;
- any agreement with a Local Authority to provide educational provision.
- the School’s CCTV (where used);
- the School’s retention of records policy;
- the School’s safeguarding, pastoral, or health and safety procedures, including as to how concerns or incidents are recorded; and
- the School’s IT policies, including its [Acceptable Use policy](#).

Anyone who works for, or acts on behalf of the School (including staff, volunteers, proprietors and service providers) should also be aware of and comply with this Privacy Notice and all relevant school policies.

Why the School needs to process personal data

The lawful basis for data processing as set out in data protection law include the following:

1. Consent
2. Contract
3. Legal obligation
4. Vital interest

5. Public Task
6. Legitimate interest

We will always seek to process data only when necessary. We will be targeted in and proportionate in our processing to achieve a purpose.

In order to carry out our ordinary duties to members of the School Community (including staff, pupils, former pupils and parents) we may process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of our daily operation.

We will need to carry out some of this activity in order to fulfil our legal rights, duties or obligations - including those under a contract with its staff, or parents of its pupils.

All six basis are equally valid for processing data but we are obliged to inform you of the basis under which we process your data.

Other uses of personal data will be made in accordance with the contract for providing the provision described in the school brochure and our 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 following uses have been identified and are linked to the lawful bases for processing data (see numbered list above)

- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents) 2 3 6
- To provide education services, including musical education, physical training or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs 1 2 6
- Maintaining relationships with former pupils and the School community; 6
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as diversity or gender pay gap analysis and taxation records) 2 3 5
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate 2 3 5 6
- 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 School 2 6
- To safeguard pupils' welfare and provide appropriate pastoral care; 2 3 4 5 6
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's IT: acceptable use policy 2 6
- To make use of photographic images of pupils, staff and parents in school publications, on the School website and (where appropriate) on the School's social media channels in accordance with the School's policy on taking, storing and using images of individuals 1 2 6
- To enable payments to be made where appropriate to individual service providers. 6
- For security purposes, including CCTV in accordance with the School's CCTV policy 2 6
- To report unauthorised absence or persistent absence to the Local Authority 2 3 6;
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School 2 6

In addition, we may need to process **special category personal data** (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on us by law, including as regards safeguarding and employment, or from time to time by explicit consent where required.

These reasons may 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 where it is in the individual's interests to do so: for example for medical advice, social services, insurance purposes or to organisers of school trips 2 4 6
- To provide educational services in the context of any special educational needs of a pupil 2 3 6
- To provide spiritual education in the context of any religious beliefs 2 6
- In connection with employment of its staff and volunteers, for example DBS checks, welfare or pension plans 2 3 6
- To provide suitable food and drink at School or an event while being respectful of religious, cultural and or medical requirements, including allergies 2 4 6
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with our legal obligations and duties of care. 2 3 6

Types of personal data we process

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/drop off/pick up facilities);
- bank details and other financial information, e.g. about Staff in order to pay salaries.
- past, present and prospective pupils' academic, disciplinary, admissions, assessment and attendance records and examination scripts and marks;
- special needs information including EHC Plans and assessment reports and Annual Review information;
- where appropriate, information about individuals' health, and contact details for their next of kin;
- references given or received by the School about pupils, and information provided by previous educational establishments and/or other professionals or organisations working with pupils; and
- images of pupils, staff and parents (and occasionally other individuals) engaging in school activities, and images captured by the School's CCTV system (in accordance with the School's policy);

Where we collect information about you from

We collect information in the following ways:

When you give it to us DIRECTLY

You may give us your information as a prospective, current or former pupil, or member of staff, or parent, or in order to receive information from the School, sign up for one of our

events or communicate with us.

When you give it to us INDIRECTLY

Your information may be shared with us by the Local Authority. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

When you give permission to OTHER ORGANISATIONS to share or it is available publicly

We may receive and record information from organisations such as colleges that we use to better understand our former pupils' education choices after Maple Hayes and to inform careers advice given to current pupils.

We may combine information you provide to us with information available from external sources in order to gain a better understanding of our supporters to improve our services.

The information we get from other organisations may depend on your privacy settings on these sites or the responses you give, so you should regularly check them. This information comes from the following sources:

Third party organisations

You may have provided permission for a company or other organisation to share your data with third parties, including charities. This could be when you buy a product or service, register for an online competition or sign up with a comparison site.

Social Media

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access information from those accounts or services. By joining an official School page or group in social media, you consent to allowing us to contact you through that platform.

Information available publicly

This may include information that has been published in articles/newspapers. This information is already in the public domain.

When we collect it as you use our websites

Like most websites, we use "cookies" to help us make our sites - and the way you use them - better. Cookies mean that a website will remember you. They are small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier - for example by automatically filling your name and address in text fields.

In addition, the type of device you are using to access our website and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have, what operating system you are using, what your device settings are, and why a crash has happened. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

CCTV

Some parts of the school maybe monitored by CCTV. We use any video and audio recorded to protect our pupils, staff and visitors while they are on site, to deter crime, and to help maintain good order within the School grounds. We retain this information for a period of up to three months. Access to CCTV footage is controlled. CCTV footage may be passed onto the Police or other relevant authorities.

Who helps us process your data

We will share personal information with the Local Authority when the pupil has an EHC Plan in order for them to fulfil their duties.

We share attendance data with the Local Authority as required by law and in accordance with the Attendance Policy

Occasionally, we will need to share personal information relating to our community with third parties, such as:

- professional advisers (e.g. safeguarding advisors, education advisors, lawyers, insurers and accountants);
- government authorities (e.g. HMRC, DfE, police or the local authority); and
- appropriate regulatory bodies (e.g. Ofsted).

For the most part, personal data collected by the School will remain within the School, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records held and accessed only by the School and appropriate medical staff under his/her supervision, or otherwise in accordance with express consent; and
- pastoral or safeguarding files.

However, a certain amount of any Special Educational Needs (SEN) pupil's relevant information (including medical 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 School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education) 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 the Local Authority Designated Officer) LADO or police. For further information about this, please view the School's Safeguarding and Child Protection Policies.

Finally, in accordance with Data Protection Law, some of the School's processing activity is carried out on its behalf by third parties, such as the *Timestable Rockstars* or *Showbie* website. This is always subject to contractual assurances that personal data will be kept securely and only processed in accordance with our specific directions.

How we store your data

We store your data securely on our network. We regularly back up our data to a secure server on a different part of the school site

Data collected using a third party application, such as Showbie will be stored on the third party's server and imported into the school. We only use third parties which comply with all relevant GDPR information.

Physical data is stored securely in offices at School. Access to physical and digitally held data is restricted to appropriate school staff, professional advisors and volunteers.

How long we keep personal data

We 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 and pupil personnel files is up to seven years after the pupil (or former pupil) has reached 18 years of age. However, as entitlement to an EHC Plan can go up to 25 years we will keep certain records upto 7

years after the former pupil has reached 25 years of age. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements, as will the school's admission register which along with specific details of a pupil's time at school will be stored indefinitely.

If you have any specific queries about how our retention 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 headteacher. However, please bear in mind that we will often have lawful and necessary reasons to hold on to some personal data even following such 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 that fact in order to fulfil your wishes (called a "suppression record").

Keeping in touch and supporting the School

The School will use the contact details of parents, former pupils and other members of the School community to keep them updated about the activities of the School, or former pupils and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the School will also:

- Contact parents and/or former pupils (including via the organisations above) by post and email in order to promote the School
- Collect information from publicly available sources about parents' and former pupils' occupation and activities and improve community reach.
- Should you wish to limit or object to any such use, or would like further information about them, please contact the headteacher writing. You always have the right to withdraw consent, where given, However, we are 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).

Your Rights

Rights of access

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

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 headteacher.

We 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).

We will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the School may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

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 (and parents need to be aware this may include their own children, in certain limited situations - please see Pupil Requests below), or information which is subject to legal privilege (for example legal advice given to or sought by the School, or documents prepared in connection with a legal action).

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

You may have heard of the “right to be forgotten”. However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child’s) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

Pupil requests

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

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, the law still considers the information in question to be the child’s: for older pupils, the parent making the request may need to evidence their child’s authority for the specific request.

Pupils at School 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. Younger children, those in Key Stage 2 may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

Parental requests

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. We 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. Where parents are separated, the School 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.

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.

As a parent you have rights to access your child’s educational record - see Education (Pupil Information) (England) Regulations 2005.

Consent

Where we are 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, certain types of marketing and fundraising activity. Please be aware however that the School may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because a purchase of goods, services or membership of an organisation such as an former pupils 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 School 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 School relying on strict consent (see section on Consent above).

Where consent is required, it may in some cases be necessary or appropriate - given the nature of the processing in question, and the pupil's age and understanding - to seek the pupil's 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 School will assume that pupil 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 School's opinion, there is a good reason to do otherwise.

However, 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 School may be under an obligation to maintain confidentiality unless, in the School's opinion, there is a good reason to do otherwise; for example where the School 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 School's policies and the School rules. Staff are under professional duties to do the same covered under the relevant staff policy. Staff are also required to respect the personal data and privacy of others and comply with all School policies.

Data Accuracy and Security

We will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible.

Where possible we use publicly available sources to keep your records up to date; for example information provided to us by other organisations (e.g. the Local Authority) as described above. We regularly contact parents so they they can update their information and have self-update systems in place for these users.

We really appreciate it if you let us know if your contact details change by contacting us at office@willows.hillingdon.sch.uk.

An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why we may need to process your data, of who you may contact if you disagree.

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

Direct Marketing

We will contact you to let you know about activities at the School. We do not sell personal details to third parties. We have a statutory duty to share some information when requested with government bodies.

Photographs

We use photographs of pupils, parents, staff, former pupils, volunteers and other guests at School events for publicity purposes. We understand there are many valid reasons why you may not wish us to use your photograph or photographs of your children in this way. This is fine, just let us know you would like to opt out of giving your photography permission by contacting us at office@willows.hillingdon.sch.uk.

Pupil Data

Pupil data is updated on a regular basis by staff, parents and pupils. Parents and Pupils are regularly invited to update pupil data where necessary.

Sharing your story

Some people choose to tell us about their experiences at the School and or share photographs and memorabilia from their time at the School. They may also share stories about their life before or after their time with the School.

If we have the explicit and informed consent of their parent or guardian because they are under 18 this information may be made public by us at events, in materials promoting the School.

Your right to know what we know about you, make changes or ask us to stop using your data

You have a right to ask us to stop processing your personal data, and if it is not necessary for the purpose you provided it to us for (e.g. registering you for an event) we will do so. Contact us on office@dyslexia.school if you have any concerns.

You have a right to ask for a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them.

If you want to access your information, send a description of the information you want to see and proof of your identity by post to The Headteacher, Maple Hayes Hall School, Abnalls Lane, Lichfield, Staffs. WS138BL . We do not accept these requests by email so we can ensure that we

only provide personal data to the right person.

If you have any questions, please send these to office@willows.hillingdon.sch.uk and for further information see the Information Commissioner's guidance on the ICO Website <https://ico.org.uk/>.

If you believe that we have not complied with this notice or acted otherwise than in accordance with Data Protection Law, they should utilise the School complaints procedure and should also notify the Headteacher. 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 them.

Changes to this Notice

We may change this Privacy Notice from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on the School Website or by contacting you directly. If you have any questions, comments or suggestions, please let us know by contacting the school office.

Legal Underpinning of this Privacy Notice.

Various laws underpin this Privacy Notice and are relevant to School.

- The Data Protection Act 1998 and related statutory instruments (until 25 May 2018)
- The General Data Protection Regulation (from 25 May 2018)
- The Data Protection Act 2018 and related legislation (from 25 May 2018, form TBC)
- The Privacy and Electronic Communications Regulations 2011 (PECR) (to continue after 25 May 2018 until replaced by the ePrivacy Regulation - form and date TBC)
- The Protection of Freedoms Act 2012 (biometrics and CCTV)

Please note that independent schools are not subject to the specific information provisions (including the parental right to see the pupil record, and Freedom of Information).

Specific Information (In alphabetical order) *Accidents and*

Incidents

School keeps a record of all accident and "near miss" incidents that occur on site or as part of its activities. This is a legal requirement and helps us to monitor the health and safety of Staff, Pupils, and other visitors. Anyone who sustains an injury while on site or working away on School business, should complete an accident/welfare report.

Admissions, Applications & Enquiries

By completing an enquiry form or by making an enquiry in person, over the phone or by email you consent to your details being used to facilitate the admissions process. You can remove yourself and your family from the admissions process at anytime by contacting the school office. Data collected during an initial enquiry will be used for a full range of marketing activities,

including sending School publications, notification of open days and other recruitment events and the sending of SMS text messages. Unless you notify us otherwise, emails, letters and other communications with applicants may be tracked and stored for up to 15 years to ensure that we are better able to tailor our future recruitment processes.

While processing your application, information concerning your child's performance at school, including their disciplinary record; school reports and examination results and financial information including information about the payment of fees may be requested from their current and or former schools.

Once a child has been admitted to the School the information on their formal application will form the basis of their pupil record and will be retained indefinitely.

Archives

Records considered to be of historic value are retained in School's archive indefinitely. Personal data concerning living individuals, which is not in the public domain, is unavailable to researchers, unless the subject of the information provides written consent.

Current and Former Parents and Guardians

As a current or former parent your data will be used for a full range of activities, including sending School publications, collection of School Fees, promotion of benefits and services available to parents and former parents, notification of School events and the sending of SMS text messages.

Data

will also be used in the School and related research into Special Educational Needs for example the information on the Enquiry form will be used for research into the pattern of special needs difficulties within families and the range of special needs provision available to pupils. Emails, letters and other communications with the School and may be tracked and stored to ensure that we are better able to tailor our future communications.

Current Pupils

We hold personal data pertaining to children and use it to: support their teaching and learning; monitor and report on their progress; provide appropriate pastoral care; and assess how well we are doing as a school.

This information includes a pupil's contact details, national curriculum assessment results, attendance information and personal characteristics such as ethnic group, special educational needs and relevant medical information. If enrolling for post 14 qualifications we may be provided with their unique learner number (ULN) by the Learning Records Service and may also obtain from them details of any learning or qualifications undertaken. School issues all pupils with a Unique Pupil Number (UPN)

Activities / Trips / Visits

School collects and shares such information as necessary to facilitate pupil trips and visits both as part of its regular curriculum and as part of its co-curriculum programme. For example, it may be necessary to share medical information with staff taking a trip out of School.

Display and Storage of Pupils' Work

As part of the normal operation of the School it is necessary to collect, mark, display and

distribute pupils work. For the most part personal information gathered during this process will be purely incidental - for example the name on the top of a piece of work. Staff must be cautious when arranging for the display or circulation of work that it does not inadvertently share biographical or other personal data. For example, a birthday display should display, only the month a child is born.

Grading of work, and the storage of those grades will be collected by staff and shared with other staff as necessary to provide a suitable learning experience for pupils and for monitoring and assessing pupils, staff and our educational programmes. Marks may be shared with external bodies such as Examination Boards.

Medical Records

When a pupil accepts a place at School, data relating to the health and medical record of that pupil will be collected. This might include medical records, details of any illnesses, allergies or other medical conditions suffered by the pupil.

Medical Records are Special Category Data, and the School uses this information in order to safeguard and promote the welfare of its pupils, for example the School uses details of any medical conditions so that staff will be able to respond appropriately in the event of a medical emergency. Medical information may be provided to the emergency services. Medical record pertaining to a pupil will be destroyed after the pupil's 25th birthday.

Special Educational Needs (SEN)

When a pupil accepts a place at School, data relating to any disabilities and or special educational needs of that pupil will be collected. This might include by way of example medical records and or records of SEN assessments.

SEN Data is Special Category Data. Relevant SEN information will be shared with the Local Authority in the case of a pupil with an EHC Plan. Relevant SEN information will be shared with School Staff where appropriate to ensure that pupils with special educational needs are given the best possible learning, co-curricular and pastoral experience. Relevant information will also be shared externally with appropriate educational bodies for example with an examination or other awarding body. SEN information will also be used to measure the effectiveness of our SEN programme. SEN records pertaining to a pupil will be destroyed after the pupil's 25th birthday.

Public Examination Results

It has long been a tradition in the UK for public examination results, such as GCSE and A Levels, to be shared in the local media, such as on websites and in the local press. These may appear either in order of attainment, or alphabetically. Students or their parents may request not have their results published and should contact the headteacher to make such a request. Similarly, Heads and Deputy Heads of School named on Honours Boards within the School, Prefects, Merit Certificate holders, 100% attendees and Prize Winners and are shared in publications such as the Parent's Open Day Programme and the School Magazine.

Anonymised academic results may be shared with other organisations to facilitate the compilation of league tables and other metrics including "value added".

Debtors

School reserves the right to pursue all debtors to the School. In extreme cases, we may work with a debt collection agency. Any actions taken to recover debts will be reasonable and proportionate to the amount owed. If we are unable to contact you using the contact information you have provided we reserve the right to use that data to trace your current contact details to enable the matter to be resolved.

Due Diligence

There are a number of occasions where it is prudent for School to run checks into the background of suppliers, supporters, parents and former pupils. For example if a when someone publicly supports the School or where the School intends to make a significant purchase from a supplier. Where the School deem it necessary to do so we reserve the right to perform credit checks and other legitimate forms of due diligence processing.

Email

By its very nature, all email contains personal data, and School takes a number of steps to secure its email systems. By emailing School the contents of your email, including your email address will be logged and stored on the School's IT systems. Your email address will then be used for future relevant correspondence, unless you request otherwise.

Events

By booking to attend a School event, you agree that your data can be processed by School in order to facilitate your attendance at that events and similar future events that we believe may be of interest to you. If you would rather not be informed of future events please do let us know by contacting us at office@willows.hillingdon.sch.uk.

Food and Drink

Where necessary we may collect and store meal preferences and information about allergies and other food related medical conditions for use in events both on and off site and for serving meals at School. As this information may include special category data about medical conditions and or ethnicity and religious beliefs.

Gifts

Records of gifts will be kept indefinitely so we can continue to engage with supporters and their families. Donors are asked if they would like their gifts recognised publicly and have the option of being able to opt out of doing so.

IT

Use of our computer networks is monitored. We may record how many times you use a service, where you use it, at what times you use it, the quantity of data traffic and how long each session lasts as well as which sites you access. This information helps us to build a profile of our users for statistical purposes and to improve how we provide our service to you. IT usage that infringes our acceptable use policy may be shared with the relevant staff and or authorities so that appropriate action can be taken. Most of this data will be aggregated into groups, which means that we will not be able to identify you individually. However to enforce our acceptable use policy we may collect identifying information about you. Our IT systems are backed up to another part of the school site.

Lettings

Any individual entering into a contract to let or rent part of School's facilities agrees to the School processing their data to fulfil the contract. We will also use your data to offer you information about similar opportunities in the future. With your consent we may also use information to promote future events and lettings.

Self Employed Staff

We process personal data relating to self-employed staff at School. This is for employment purposes and to assist in the running of the School, for example to enable appropriate background checks to be completed.

Staff

We process personal data relating to those we employ to work at, or otherwise engage to work at, School. This is for employment purposes to assist in the running of the School and to fulfil our contractual arrangements, for example enabling individuals to be paid and to enable appropriate background checks to be completed.

This personal data includes identifiers such as names and National Insurance numbers and characteristics such as employment contracts and remuneration details, qualifications and absence information. We will not share information about you with third parties without your consent unless the law requires us to.

Where a member of staff and their spouse is resident on School premises we will collect information to enable us to carry out suitable background checks in relation to the spouse.

In addition, we process personal data relating to individuals applying for roles at the School. Information related to unsuccessful applicants is destroyed within 12 months of their application being processed unless their consent has been given to retain the data.

When staff leave the School their contact details will be used for communication regarding School events. Their file will be retained in order to provide, if requested, references or information about their employment at Maple Hayes School.

Suppliers of Goods and Services

Personal data relating to the suppliers of goods and services who are not corporate bodies is processed to enable the recording of transactions and the payment of monies due to the suppliers. This data will include name, address, telephone email and bank account details.

Training

The School encourages its staff, students and volunteers to undergo training from time to time. As part of this process it may be necessary to share information such as previous qualifications, driver's license details or other personal information with training providers and or awarding bodies. Records of such training are stored by the School.

Volunteers

We are grateful to former pupils, parents and other friends of the School who give of their time to support School activities. It may be necessary for volunteers to provide information including name, contact details, address and date of birth. Where appropriate may require volunteers to supply further information to enable us to carry out suitable background checks. Volunteers who wish to receive communications from the School will be asked to share relevant data to do so.