

WELLINGTON COLLEGE



PRIVACY NOTICE

INTRODUCTION

The Wellington College is a registered charity with number 309093 (the “College”).

The College is a data controller for the purposes of data protection legislation as we process personal data. This notice is designed to give you information about how we process that data. Our duties in respect of personal data are very important to us and we are committed to using the personal data we hold in accordance with the law. The College’s Legal & Compliance Director is responsible for data protection at the College and will endeavour to ensure that the College complies with its responsibilities. Any queries should be directed to her by email at data@wellingtoncollege.org.uk or by post at The Bursary, Wellington College, Duke’s Ride, Crowthorne, RG45 7PU.

This notice applies alongside any other information the College may provide about a particular use of personal data, for example when collecting data via an online or paper form. The notice should be read in conjunction with our other policies and contracts which apply to you and which make reference to personal data. This includes any contract you have entered into with the College, our safeguarding, pastoral (including the [Taking, Storage and Use of Pupil Images Policy](#), the [CCTV policy](#) and the [Biometrics Policy](#)) and health & safety policies, our IT policies (including the Acceptable Use Policy). Separate privacy notices apply to [Wellington College Enterprises Limited](#), the [Wellington Community](#) and our staff.

It should be noted that the College also has safeguarding and child protection duties and that, if there is a potential conflict between these duties and those under data protection legislation, the welfare of the child is paramount.

The College expects individuals to whom this notice applies to respect the personal data and privacy of others to whom the notice applies and to staff of the College.

WHAT TYPE OF PERSONAL DATA DOES THE COLLEGE PROCESS?

We process personal data about prospective, current and past: pupils and their parents (which includes guardians and carers as well as anyone with parental responsibility for that pupil); staff, governors and volunteers; suppliers and contractors; members of staff, governors and pupils of other schools in the Wellington family of schools (including Eagle House School, schools within the Wellington Multi-Academy Trust and the international schools); job applicants; persons hiring College facilities for education related purposes; adults and children attending an educational course (residential or non-residential), conference or other activity or event organised or hosted by the College (whether sole organiser or in partnership with any other organisation) (collectively “**educational events**”); adults

and children attending events hosted by the College other than educational events; donors, friends and supporters; family members of any of the foregoing; families of members of staff living on site; those who visit the College for any reason; and others connected with the College.

The personal data we process takes different forms (it may be factual information, opinion, images or other recorded information) and the type of data processed will depend on your relationship with the College. Examples of the personal data we process include:

- names;
- addresses, telephone numbers, email addresses and other contact details;
- biometric information;
- past, present and prospective pupils' admissions, academic, sport, co-curricular information, pastoral, health and any special needs information, attendance and disciplinary records and examination scripts and marks;
- education and employment information;
- in respect of those who access the College site, images and video footage;
- financial information;
- courses, conferences, activities, events or meetings attended;
- car details and driving licence details; and
- correspondence with and concerning individuals.

We may also need to process special category personal data (for example, regarding physical or mental health, ethnicity, religion or biometric data) and criminal records information about some individuals (particularly staff). Where we process this type of data, we will either rely on rights or duties imposed on us by law (for example, in respect of safeguarding, health and safety or employment) or on explicit consent.

HOW DOES THE COLLEGE COLLECT PERSONAL DATA?

Most of the personal data processed by us is provided by the individual (or, in the case of pupils, by their parents or, in the case of children attending educational events, their parents or school). This may be provided via a form or simply in the ordinary course of interaction or communication. However, some personal data is provided to us by third parties (for example, previous schools, referees, the Disclosure & Barring Service, other schools participating in the Teaching School or Independent State School Partnership programmes, professionals or authorities working with the individual) with the consent of the individual or from publicly available resources.

WHO HAS ACCESS TO PERSONAL DATA?

For the most part, personal data held by the College will remain within the College and will be processed by appropriate members of staff for the purpose for which the data was collected. As an organisation, we have taken appropriate technical steps to protect your personal data and have implemented policies addressing use of technology. Particularly strict rules of access apply in the context of medical records and pastoral or safeguarding file although a certain amount of information will need to be disseminated more widely in order to provide the necessary care and education that the pupil requires (for example, details of any allergies).

Some of the College's systems are provided by third parties with some being hosted by the College and others externally. Those hosted internally include the parent portal and certain finance and administrative functions. Those hosted externally include the College's website, event and trip

booking systems. The organisations providing these systems are aware of the requirements of current data protection legislation.

In certain circumstances, we share personal data (including, where necessary, special category personal data) with third parties in order to further the objectives and interests of the College and facilitate the efficient operation of the College. Examples of the third parties with whom we share personal data are other schools within the Wellington College family (including Eagle House School, schools within the Wellington Multi-Academy Trust and the international schools), our trading company, Wellington College Enterprises Limited, relevant authorities (such as the Local Children Safeguarding Board, DBS, NCTL, UKVI, HMRC, DfE, DWP, the Charity Commission the Independent Schools Inspectorate, the Information Commissioner), the emergency services, examination boards, third parties who run or support academic, musical, sporting or co-curricular tuition, activities and training or school trips on behalf of or in conjunction with the College (for example, the CCF, the Duke of Edinburgh Award Scheme and travel operators), other schools and universities, employers, the College's doctors, other schools involved in the Teaching Schools or Independent State School Partnership programmes, other delegates at educational events and the College's professional advisers.

WHY DO WE PROCESS PERSONAL DATA?

We process personal data to support the College's operations, objectives and interests. This broad purpose encompasses the following:

- **the selection and admission of pupils**, including the awarding of scholarships and bursaries;
- **the provision of education and related services to pupils (and their parents)**, including academic, sporting, musical and co-curricular tuition, training and activities (and in the context of any special educational needs of a pupil), personal and spiritual development, school trips, participation in exams, administration of the school curriculum and timetable, monitoring pupil progress and needs, reporting on the same internally and to parents, provision of references and career services (including after a pupil has left the College);
- **the safeguarding of pupil's welfare and provision of pastoral and medical care**, whether by their tutor, house master, matron, member of the medical centre team or other member of the teaching or non-teaching staff;
- **the selection for, the provision of education and related services, the safeguarding of welfare and provision of pastoral and medical care to those children attending educational events** where the arrangement has been entered into between the parent of that child and the College;
- **research into and development of effective teaching and learning methods and best practice** through our Teaching Schools and Independent State School Partnership;
- **compliance with legislation and regulation**, including that relating to safeguarding, health and safety, employment, charities and independent schools;
- **operational management** including the compilation of pupil records, the administration of invoices, fees and accounts, the management of the College's property, the management of security and safety arrangements (including the use of CCTV in accordance with our CCTV policy and monitoring of the College's IT and communication systems in accordance with our Acceptable Uses Policy) management planning and forecasting, research and statistical analysis, the administration and implementation of the College's rules and policies for pupils, staff and others, the maintenance of historic archives, enabling the relevant authorities to monitor the College's performance, and other operational purposes;

- **staff administration**, including the recruitment of staff, governors and other volunteers and engagement of contractors (including compliance with DBS procedures), administration of payroll, pensions, sick leave and other benefits, review and appraisal of performance, conduct of any grievance, capability or disciplinary procedures, the maintenance of appropriate human resources records for current and former staff and providing references;
- **the promotion of the College and activities organised by it** including through its own websites, the prospectus and other publications and communications and including by publishing the results of public examinations or other achievements of pupils of the College or using photographic images of pupils in College publications, on any College website and, where appropriate, on College social media channels;
- **maintaining relationships with alumni and the wider Wellington community**, including direct marketing or fundraising activity;
- **conducting appropriate donor due diligence**, including confirming the identity of any prospective donor and carrying out any background checks considered necessary;
- **provision of educational events**, including the direct marketing, promotion, administration, monitoring, development and performance of such educational events and maintenance of relationships with former attendees;
- **obtaining appropriate professional advice and insurance for the College**; and
- **where specifically requested by the individuals concerned.**

In some situations, we have to carry out these processes in order to meet our legal obligations, whether they are imposed on us by law or through contract (such as the Terms & Conditions, staff employment contracts or Booking Terms & Conditions). In other situations, we have obtained the consent of the relevant individual to the particular processing of the data. The College has determined that it has a legitimate interest in all of the remaining processes we conduct.

FOR HOW LONG DO WE KEEP PERSONAL DATA?

Personal data will be kept securely and for no longer than is necessary or required by law. As this period will vary depending on the piece of personal data and the purpose for which it was collected, we have implemented a retention programme which details the time periods for each different category. If you have any specific questions in respect of retention, please direct them to the Legal & Compliance Director.

Wellington Community

The College will keep the contact details of parents, alumni, parents of alumni, current and former staff and other members of the Wellington Community so that those individuals can be updated about the activities of the College or about alumni, parent or community events of interest unless the relevant individual notifies the Wellington Community Office that they no longer wish to receive such updates. More information can be found in the Privacy Notice – Wellington Community (www.wellycom.net). Individuals who are part of the Wellington Community should be aware that certain personal data held by the Wellington Community is held and processed outside of the European Economic Area.

Archive

It should be noted that records considered by the College to be of historic value are retained in the College's archive indefinitely. Personal data in the archive relating to the living individuals which is not otherwise in the public domain is not shared with third parties without that individuals' consent.

WHAT RIGHTS DO YOU HAVE IN RESPECT OF YOUR PERSONAL DATA?

If we process personal data about you, you have a number of rights in respect of that data. Subject to certain exemptions and limitations specified by law, you can:

- require the College to change incorrect or incomplete data;
- require the College to delete your data;
- withdraw your consent to the College processing certain personal data where the College is relying on your consent to do so;
- object to the College processing your data where we are relying on our legitimate interests to do so;
- require the College to transfer your personal data to another organisation; or
- access and obtain a copy of your data on request.

If you would like to exercise any of these rights, please contact the Legal & Compliance Director by email at data@wellingtoncollege.org.uk or by post at The Bursary, Wellington College, Duke's Ride, Crowthorne, RG45 7PU. We will respond to such written requests as soon as is reasonably practicable and in any event within the time limits permitted by law. The College will be better able to respond quickly to smaller, targeted requests for information.

Data relating to children

Rights in respect of personal data belong to the individual to whom the data relates. However, in respect of children, we will often rely on parental authority or notice to process personal data (if consent is required) unless we consider that, given the age and understanding of the child and the type of processing, it is more appropriate to rely on the child's consent. Parents should be aware that whether they are consulted or not will depend upon the interests of the child, the parents' rights and all other circumstances.

In general, we will assume that a child's consent is not required before ordinary disclosure of their personal data to their parents (for example, to keep parents informed of their child's progress, behaviour and activities or in the interests of the child's welfare) unless the College considers that there is a good reason to do otherwise.

However, if a child seeks to raise concerns confidentially with a member of staff and expressly withholds their consent to their personal data being disclosed to their parents, the College may be obliged to keep the information confidential unless the College considers that there is a good reason to do otherwise.

Children can make a subject access request for their own personal data if they have sufficient maturity to understand the request they are making. Our pupils are generally assumed to have this level of maturity. A child may ask a parent or other representative to make a request on their behalf. Whilst a parent will generally be entitled to make a subject access request on behalf their child, the personal data will always be considered to be the child's at law and, if of sufficient maturity, that child's consent or authority may be required to be obtained by the parent making the request. All information requests from, on behalf of or concerning children – whether made under subject access or simply as an incidental request – will therefore be considered on a case by case basis.

THIS NOTICE

The College will update this notice from time to time. Any substantial changes that affect your rights will be notified on our website and, as far as reasonably practicable, notified to you.

If you believe that the College has not complied with this notice or acted other than in accordance with data protection laws, you should notify the Legal & Compliance Director. 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 College before involving the regulator.

May 2018

Legal & Compliance Director