

1. OVERVIEW

- 1.1 We take our obligations under privacy and data protection law very seriously. This privacy notice is designed to help you understand what personal information we collect, why, how we use it and with whom we share it. It also explains the rights you have in connection with your personal information, including how to contact us or to make a complaint.
- 1.2 This notice applies to The Woodard Corporation (Woodard), who we also refer to throughout as “we”, “us” or “our”.

2. THE PURPOSE OF THIS PRIVACY NOTICE

- 2.1 This policy is intended to provide information about how Woodard will use (or “process”) personal data about individuals including: its staff, trustees, Fellows and governors, its fellow members, current, past and prospective pupils of Woodard schools (where data are held by Woodard); and their parents, carers or guardians (referred to in this policy as “parents”).
- 2.2 This information is provided because data protection law gives individuals rights to understand how their data is used. Staff, trustees, Fellows and governors, fellow members, parents and pupils are all encouraged to read this Privacy Notice and understand Woodard’s obligations to its entire community.
- 2.3 This Privacy Notice applies alongside any other information Woodard may provide about a particular use of personal data, for example when collecting data via an online or paper form.
- 2.4 Anyone who works for, or acts on behalf of, Woodard (including staff, volunteers, trustees and service providers) should also be aware of and comply with this Privacy Notice, which also provides further information about how personal data about those individuals will be used.

3. RESPONSIBILITY FOR DATA PROTECTION

- 3.1 Woodard is a Data Processor for the purposes of Data Protection Legislation, including the General Data Protection Regulation (GDPR). Contact details are provided at the end of this privacy notice. Woodard will deal with all your requests and enquiries concerning the use of your personal data (see section on “Your Rights” below) and endeavour to ensure that all personal data are processed in compliance with this policy and data protection law.
- 3.2 Woodard is specifically exempt from the Data Protection Fee as it is a not-for-profit organisation.

4. WHY WOODARD NEEDS TO PROCESS PERSONAL DATA

- 4.1 In order to carry out its ordinary duties to staff, trustees, Fellows and governors, fellow members, pupils and parents, Woodard needs to process a range of personal data about individuals (including current, past and prospective staff, trustees, Fellows, governors, fellow members, pupils or parents) as part of its daily operation.
- 4.2 Some of this activity Woodard will need to carry out in order to fulfil its **legal obligations**, duties or obligations.
- 4.3 Other uses of personal data will be made in accordance with Woodard’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.

- 4.4 Woodard expects that the following uses will fall within that category of its (or its community's) "**legitimate interests**":
- Maintaining relationships with trustees, Fellows, governors, fellow members and the Woodard 'community', including any direct marketing or fundraising activity;
 - To provide education services, including professional development training, spiritual development and career support services;
 - For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background [and relevant interests];
 - For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
 - To enable relevant authorities to monitor Woodard's performance and to intervene or assist with incidents as appropriate;
 - To carry out or co-operate with any external complaints, disciplinary or investigation process; and
 - Where otherwise reasonably necessary for Woodard's purposes, including to obtain appropriate professional advice and insurance for the schools.
- 4.5 In addition, Woodard will on occasion need to process **special category personal data** (concerning health, ethnicity, religion, biometrics or sexual orientation) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons will include:
- To provide spiritual education in the context of any religious beliefs;
 - In connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans;
 - As part of any external complaints, disciplinary or investigation process that involves such data; or
 - For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.
- 4.6 Woodard requires **consent** to process personal data. Woodard does not rely on passive consent and seeks positive confirmation, in all cases where this is required. We collect and use personal data provided to us by staff, trustees, Fellows and governors and fellow members to keep in contact and inform them of Woodard's activities. We recognise that many of those supporting Woodard (but not all) hold religious beliefs and, since this can be considered to be sensitive information, this information is only accessed on a need-to-know basis. Unless required by law or as otherwise described in this Privacy Notice, we do not disclose your personal data to any third party without your prior consent.
- 4.7 We do not have to obtain consent when the use to which the data are being put is shared with others in order to carry out a service to other Woodard supporters, such as publication of the Kalendar. This is a legitimate activity so that Woodard Fellows are able to make contact, via Woodard, with those involved in their fellow Woodard schools. If it was intended to share the information outside Woodard for a new, unrelated purpose, then we would need to obtain specific consent.

**THE WOODARD CORPORATION
PRIVACY NOTICE**



4.8 When it is in our legitimate interests to do so: as part of our engagement and efforts to build long-term relationships with those who support Woodard (Fellows, trustees, governors, members), we will send you communications via post and email unless you have told us you do not wish to receive these communications. This need not be an ‘all or nothing’ option and ‘supporters’ can choose not to be included in distribution lists.

5. TYPES OF PERSONAL DATA PROCESSED BY WOODARD

TYPE OF DATA	EXAMPLE OF HOW IT IS COLLECTED
Names, addresses, telephone numbers, email addresses and other contact details.	When you contact us by post/email or are appointed as a Fellow or trustee.
Bank details.	When we make automatic bank payments to you.
Indirectly from third parties.	When you provide details to the third party that is then passed to us for contact purposes eg, via a Woodard school or other professionals or authorities working with an individual.
Personnel files, including in connection with academics, employment or safeguarding.	When you apply for a job or take on a voluntary role.
Where appropriate, information about individuals’ health and welfare, and contact details for their next of kin.	In relation to employment or for insurance purposes.
Correspondence with and concerning staff, trustees, Fellows and governors, fellow members, pupils and parents past and present.	In the course of communication with individuals in order to inform them of the activities of Woodard.
Non-personal data, for example IP addresses, details of web pages visited etc.	When you use the Woodard website.

6. WHO HAS ACCESS TO PERSONAL DATA AND WITH WHOM WOODARD SHARES IT

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

- professional advisers (eg lawyers, insurers, PR advisers and accountants);
- government authorities (eg HMRC, DfE, police or the local authority); and
- appropriate regulatory bodies (eg the Charity Commission or the Information Commissioner).

6.2 For the most part, personal data collected by Woodard will remain within Woodard, and will be processed by appropriate individuals only in accordance with access protocols (ie on a ‘need to know’ basis).

6.3 Finally, in accordance with data protection law, some of Woodard’s processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual

assurances that personal data will be kept securely and only in accordance with Woodard's specific directions.

7. RETENTION POLICY

- 7.1 Woodard establishes its policies for document retention in cognisance of the guidelines provided by the Information and Records Management Society, but with discretion being applied in instances relating to child protection, payroll and pensions, for example.
- 7.2 Paper and electronic copies of forms and correspondence relating to membership of Woodard, eg Corporate Fellows, Fellows Emeritus/Honorary Fellows and Members of Woodard, are kept for ten years after an individual ceases to be involved in Woodard in such capacity.
- 7.3 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 Office Manager, The Woodard Corporation, High Street, Abbots Bromley, Rugeley, Staffordshire WS15 3BW. However, please bear in mind that Woodard will often have lawful and necessary reasons to retain some personal data **even following such request**.
- 7.4 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").

8. KEEPING IN TOUCH AND SUPPORTING WOODARD

- 8.1 Where we have some form of legal relationship with supporters, we will continue to send you information related to that legal relationship; for example, those who have a right to be at the Woodard AGM will be invited, as we are required to inform you under the Woodard Articles.
- 8.2 Where the communication does not form part of a formal legal relationship, we are required to seek a positive confirmation that potential recipients wish us to send them information, newsletters and updates, and we need to make this specific to the item or update being sent by email or by post.

9. YOUR RIGHTS

- 9.1 Individuals have various rights under data protection law to access and understand personal data about them held by Woodard, and in some cases ask for it to be erased or amended or have it transferred to others, or for Woodard to stop processing it – but subject to certain exemptions and limitations.
- 9.2 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 are used, should put their request in writing to the Office Manager, The Woodard Corporation, High Street, Abbots Bromley, Rugeley, Staffordshire WS15 3BW or by email to jillshorthose@woodard.co.uk.
- 9.3 Woodard 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).
- 9.4 Woodard 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, Woodard may ask you to reconsider, or require a proportionate fee (but only where data protection law allows it).

- 9.5 You should be aware that the right of access is limited to your own personal data, and certain data are 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), or information which is subject to legal privilege (for example legal advice given to or sought by Woodard, or documents prepared in connection with a legal action).
- 9.6 Where Woodard 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 Woodard may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

10. DATA ACCURACY AND SECURITY

- 10.1 Woodard 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 Office Manager of any significant changes to important information, such as contact details, held about them.
- 10.2 An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under data protection law).
- 10.3 Woodard 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 Woodard systems. All staff and Woodard trustees will be made aware of this policy and their duties under data protection law and receive relevant training.

11. THIS POLICY

- 11.1 Woodard will update this Privacy Notice from time to time. 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 Office Manager using the following contact details.

Office Manager
The Woodard Corporation
High Street
Abbot Bromley
Rugeley
Staffordshire
WS15 3BW

01283 840120 – jillshorthose@woodard.co.uk

If an individual believes that Woodard has not complied with this policy or acted otherwise than in accordance with data protection law, they should notify the Office Manager, or if the complaint relates to the Office Manager then it should be made to the Director of Finance. 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.