



# Privacy Policy

This policy is reviewed every year. Next review date: August 2025. **Aug25 CSH**

## Introduction

At Woodland Nurture, we are committed to maintaining trust and confidence. We aim to ensure that all personal data collected about staff, pupils, parents, visitors and other individuals is collected, stored and processed in accordance with the General Data Protection Regulation (GDPR) and the provisions of the Data Protection Act 2018 (DPA 2018) as set out in the Data Protection Bill. This policy applies to all personal data (personal information), regardless of whether it is in paper or electronic format.

This Privacy Policy sets out what, when and why we collect your personal data, how we use it, the limited conditions under which we may disclose it to others and how we keep it secure.

## Data Controller

Woodland Nurture is registered as a data controller with the ICO and will renew this registration annually or as otherwise legally required.

## Data protection officer

The data protection officer (DPO) is responsible for overseeing the implementation of this policy, monitoring our compliance with data protection law, and developing related policies and guidelines where applicable. The DPO is also the first point of contact for individuals whose data the school processes, and for the ICO. Woodland Nurture's DPO is Claire Hughes.

All staff are trained by the DPO to ensure they comply with this policy.

## Data protection principles

The GDPR principles state that personal data must be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary for the purposes for which it is processed
- Processed in a way that ensures it is appropriately secure

## Collecting personal data: Lawfulness, fairness and transparency

We will only process personal data where we have one of 6 'lawful bases' (legal reasons) to do so under data protection law:

- The data needs to be processed so that we can fulfil a contract with the individual, or the individual has asked us to take specific steps before entering into a contract
- The data needs to be processed so that we can comply with a legal obligation

- The data needs to be processed to ensure the vital interests of the individual e.g. to protect someone's life
- The data needs to be processed so that we can perform a task in the public interest, and carry out our official functions
- The data needs to be processed for the legitimate interests of Woodland Nurture or a third party (provided the individual's rights and freedoms are not overridden)
- The individual (or their parent/carer when appropriate in the case of a pupil) has freely given clear consent

### **Sharing personal data**

We will not normally share personal data with anyone else, but may do so where:

- There is an issue with a pupil or parent/carer that puts the safety of our staff at risk
- We need to liaise with other agencies - we will seek consent as necessary before doing this

We will also share personal data with law enforcement and government bodies where we are legally required to do so, including for:

- The prevention or detection of crime and/or fraud
- The apprehension or prosecution of offenders
- The assessment or collection of tax owed to HMRC
- In connection with legal proceedings
- Where the disclosure is required to satisfy our safeguarding obligations
- Research and statistical purposes, as long as personal data is sufficiently anonymised or consent has been provided
- We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our pupils or staff.

### **Photographs and videos**

As part of our everyday activities, we may take photographs and record images of individuals within our setting. We will obtain written consent from parents/carers for photographs and videos to be taken of their child for communication, marketing and promotional materials. We will clearly explain how the photograph and/or video will be used to both the parent/carer and pupil.

Uses may include online on our FaceBook page, Instagram and our website, and in brochures, newsletters, etc

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.

When using photographs and videos in this way, we will not accompany them with any other personal information about the child, to ensure they cannot be identified. See our Safeguarding and Child Protection Policy for more information on use of photographs and videos.

We ask that parents and others do not post any images or videos which include any child other than their own child on any social media or otherwise publish those images or videos.

## **Data security and storage of records**

We will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage.

In particular:

- Paper-based records and portable electronic devices, such as laptops and hard drives that contain personal data are kept under lock and key when not in use
- Passwords that are at least 8 characters long containing letters and numbers are used to access computers, laptops and other electronic devices.

## **Disposal of records**

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it. For example, we will shred or incinerate paper-based records, and overwrite or delete electronic files.

## **Personal Data on our Website, Instagram and Face Book Page:**

As part of the registration process for our events we collect personal information. We use that information for a couple of reasons: to tell you about stuff you've asked us to tell you about; to contact you if we need to obtain or provide additional information; to check our records are right and to check every now and then that you're happy and satisfied. We don't rent or trade email lists with other organisations and businesses.

### **Personal data we collect**

We collect, process, store and use personal data when you book a ticket to an event including your name, address and email address together with payment information. We may also collect personal data that you give to us about other people if you register them to attend an event. You agree that you have notified any other person whose personal data that you provide to us of this privacy notice and, where necessary, obtained their consent so that we can lawfully process their personal data in accordance with this policy.

All personal data that you provide to us must be true, complete and accurate. If you provide us with inaccurate or false data, and we suspect or identify fraud, we will record this.

You do not need to provide us with any personal data to view our event ticket shop. However, we may still collect the information set under the Data we automatically collect section of this policy, and marketing communications in accordance with the Marketing Communications section of this policy.

When you contact us by email or post, we may keep a record of the correspondence and we may also record any telephone call we have with you.

We use a third-party provider, MailChimp, to deliver our event information. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our service. For more information, please see [MailChimp's privacy notice](#). You can unsubscribe to general mailings by clicking the unsubscribe link at the bottom of any of our emails or by emailing our data protection officer Claire Hughes.

## **Marketing Communications**

If you opt in to receive marketing communications from us you consent to the processing of your data to send you such communications, which may include newsletters, blog posts, surveys and information about new events. We retain a record of your consent.

You can choose to no longer receive marketing communications by contacting us or clicking unsubscribe from a marketing email. If you do unsubscribe to marketing communications, it may take up to 5 business days for your new preferences to take effect. We shall therefore retain your personal data in our records for marketing purposes until you notify us that you no longer wish to receive marketing emails from us.

## **Cookies**

A cookie is a small text file containing a unique identification number that is transferred (through your browser) from a website to the hard drive of your computer. The cookie identifies your browser but will not let a website know any personal data about you, such as your name and/or address. These files are then used by websites to identify when users revisit that website.

Our event ticket shop uses cookies so that we can recognise you when you return and personalise your settings and preferences. Most browsers are initially set up to accept cookies. You can change your browser settings either to notify you when you have received a cookie, or to refuse to accept cookies. Please note that our event ticket shop may not operate efficiently if you refuse to accept cookies.

We also use Google Analytics to monitor how the event ticket shop is used. Google Analytics collects information anonymously and generates reports detailing information such as the number of visits to the event ticket shop, where visitors generally came from, how long they stayed on the event ticket shop, and which pages they visited. Google Analytics places several persistent cookies on your computer's hard drive. These do not collect any personal data. If you do not agree to this you can disable persistent cookies in your browser. This will prevent Google Analytics from logging your visits.

## **Access to your personal Information**

You are entitled to request to view, access or delete the personal information that we hold. Email your request to our DPO Claire Hughes.

Please refer to [DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people, parents and carers](#) and [Keeping children safe in education - GOV.UK](#) for more information including some circumstances such as child protection and safeguarding where we are required to share information with other parties.

## **How to complain**

If you are unhappy with how we have used your personal data, please contact our DPO, Claire Hughes. If the issue is not resolved, you can contact the ICO :

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF Helpline number: 0303 123 1113