

# Privacy Notice

## Wycombe Abbey Summer Programme

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This notice is to help parents and students understand how and why we collect personal information and what we do with that information. It also explains the decisions that you can make about your own personal information.

If you have any questions about this notice, please contact the Summer Programme at [summerprogramme@wycombeabbey.com](mailto:summerprogramme@wycombeabbey.com)

### Who we are

“We” are Wycombe Abbey Services Limited trading as “Wycombe Abbey Summer Programme” and UK Language Courses (UKLC).

**Wycombe Abbey Services Ltd**, a private boarding school enterprise incorporated in England and Wales with company number 02510811 and registered office at Wycombe Abbey, Frances Dove Way, High Wycombe, HP11 1PE, United Kingdom.

**UKLC**, registered office Suite 1d, Rossett Business Village, Rossett, Nr Chester, LL12 0AY. Company number 4339294

For the purposes of the UK General Data Protection Regulations and Data Protection Act 2018 (“the DPA”), Wycombe Abbey and UKLC are “joint data controllers” of personal information about students, prospective students, the child/participant for whom the summer programme has been booked, their parents and/or guardians, delegates and any third party agents, resellers or suppliers whose data we process (“your personal information”).

### What is this Privacy Notice for?

This Privacy Notice is intended to provide information about how we will use (or “process”) personal information. This information is provided in accordance with the rights of individuals under UK Data Protection Law to understand how your personal information is used. You are encouraged to read this Privacy Notice and understand our obligations to you.

This **Privacy Notice** also applies in addition to other relevant terms and conditions and policies we have in place, including:

- CCTV and Surveillance policy;
- Taking, storing and using images policy;
- Retention of records policy;
- Safeguarding, pastoral, or health and safety related policies, including as to how concerns or incidents are recorded; and
- IT policies, including acceptable use and online safety policies.

Anyone who works for, or acts on behalf of, us (including staff, volunteers and service providers) are subject to suitable training and should comply with this Privacy Notice and our data protection procedures.

## Responsibility for Data Protection

We have appointed a Data Protection Lead with responsibility for data protection, and who will deal with any requests and enquiries concerning our use of your personal information (see section on Your Rights below). We will endeavour to ensure that all personal information is processed in compliance with this policy and UK General Data Protection Regulations.

The Data Protection Lead can be contacted by email: [complianceoffice@wycombeabbey.com](mailto:complianceoffice@wycombeabbey.com)

## What is personal information?

Personal information, often referred to as data, is information that identifies you as an individual.

This includes information such as your contact details, emergency contacts, medical information and financial information. We may also hold information about your flights and language spoken. CCTV, photos and video recordings of you are also personal information.

## Why we need to collect and use your personal information

Our primary reason for using personal information is to provide education, pastoral care and activities as part of a residential Summer Programme.

Sometimes we will need to collect information in order to fulfil our legal rights, duties or obligations, including those under a contract.

Other uses of personal information will be made in accordance with our legitimate interests, or the legitimate interests of another, provided that this is not unfair on individuals.

Our legal grounds for using your information will fall within the category of “**legitimate interests**”:

- To provide education services, including musical education, physical training, development and extra-curricular activities to students, and monitoring student progress and educational needs;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law;
- To enable relevant authorities to monitor the Summer Programme's performance and to intervene or assist with incidents as appropriate;
- To safeguard students' welfare and provide appropriate pastoral care.
- To monitor (as appropriate) use of our IT and communications systems in accordance with the Online-safety policy and Acceptable IT Use policy;
- To make use of photographic images of students in our publications, on our website and (where appropriate) on our social media channels in accordance with our policy on taking, storing and using images of student;
- To carry out or cooperate with any complaints, disciplinary or investigation process;
- For security purposes, including CCTV in accordance with CCTV policies;
- To maintain relationships with the Summer Programme community (current Students) and past students, including parents sending information about future Summer Programmes where participants have subscribed to further communications;

In addition, we will on occasion need to process **special category personal information** (concerning health, ethnicity, religion) or duties imposed on us by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons will include:

- To safeguard students' welfare and provide appropriate pastoral care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of a

medical condition or other relevant information where it is in your interests to do so. Such as, for medical advice, for social protection, safeguarding, cooperation with police or social services, for insurance purposes or to caterers or organisers of trips who need to be aware of dietary or medical needs;

- To provide educational services in the context of any special educational needs of a student;
- As part of any complaints, disciplinary or investigation process that involves such information, for example if there are Special Educational Needs and Disabilities (SEND), health or safeguarding elements; 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.

### Providing consent

We may ask for your consent to use your information in certain ways. If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please contact [complianceoffice@wycombeabbey.com](mailto:complianceoffice@wycombeabbey.com) if you would like to withdraw any consent given.

### Personal data we collect and how we process this data

In most cases we will rely on one of the grounds above for a particular use of your information.

Types personal information we process.

- **Contact details** - names, addresses, telephone numbers, e-mail addresses and other contact details;
- **Third Party Contact Information** – relevant to the services provided such as booking agent information, transport provider, payment processors, credit agency; where appropriate, information about health and welfare, and details of emergency contacts;
- **Financial Information** – we hold this information to perform our contract with you and will include bank details and other financial information including, in some cases we get information from third parties;
- **Visa Information** – visa support information which we hold to provide you with a Visa Support Letter to support the student's application for a visa if they require a visa to enter the UK for a Summer Programme. Such information includes the summer programme booking reference, your contact information, the student's name, surname, date of birth and passport information
- **Booking Information** – summer programme booking information for each student includes contact information, relationship to student, name, date of birth, gender, nationality and financial information.
- **Transport Information and Airport Transfers** – student information including flights and travel arrangements will be held;
- **Communication Information** – a record of any communications between us and you will be held;
- **Student Images** - images of students engaging in summer programme activities, and images captured by the CCTV system in accordance with the booking terms and conditions on the taking, storing and using images of children;
- **Marketing Information** – This may include names, addresses, email addresses and will be used to provide information about our future programmes and customer feedback.

We process this information in order to improve or customise our services, communicate with you about our services or for market research purposes, on the basis of our legitimate interests in communicating with you about our services or on the basis that you have consented to receiving the information. We will collect information either from you directly or from a third party (for instance a booking agent or introducer). If we do obtain your personal data from a third party your privacy rights under this notice are not affected and you are still able to exercise the rights contained within this privacy notice.

### How we collect information

Generally, we receive personal information from the individual directly (including, in the case of students from their parents, guardians or agents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However, in some cases personal information may be supplied by third parties or collected from publicly available resources such as internet searches, in order to undertake due diligence.

### **Sharing personal information with third parties**

For the most part, personal information collected by us will be processed by appropriately trained individuals in accordance with access protocols (ie on a need-to-know basis). However, some functions are outsourced including educational services, cloud storage, catering and emailing communications. In accordance with UK Data Protection this type of external data processing is subject to contractual assurances that personal data will be kept securely and used only in accordance with our specific directions.

In accordance with our legal obligations, we will share information with local authorities, where we have any safeguarding concerns.

For the most part, personal information collected by us will be processed by appropriate individuals only in accordance with access protocols. Particularly strict rules of access apply in the context of medical information held and accessed only by appropriate staff under his/her supervision, or otherwise in accordance with express consent; and

However, a certain amount of any Special Educational Needs and Disabilities (SEND) student's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the student requires.

We are under duties imposed by law and statutory guidance to record or report incidents and concerns that arise or are reported, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This may include file notes on safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police.

We have in place software to monitor use of technology (e.g. email, internet, mobile devices) for the following purposes:

- to safeguard or promote pupil's welfare;
- to avert a perceived risk of serious harm to students or to another person at the summer programme; or
- to alert our staff to a particular vulnerability the student may have.

### **Sending information to other countries**

We may send your information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may:

- store your information on cloud computer storage based overseas; or
- communicate with you by email when you are overseas (for example, when you are on holiday).

We can provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about these safeguards, please contact us at: [complianceoffice@wycombeabbey.com](mailto:complianceoffice@wycombeabbey.com).

### **How long we keep personal information**

We will keep personal information 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 student and contract files is up to 7 years following end of contract. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

As an example, the table below shows for how long we keep different types of your information.

Type of information	Retention period or the criteria used to determine the retention period
Students Educational Data	Assessments results are held for one year.
Booking Contract Information	Held for 7 years, or longer if required to do so
Travel and Visa Information	Deleted after one year.
Marketing Information	Held for 3 years from last date of booking, contact or enquiry

If you have any specific queries about how our retention policy is applied, or wish to request that personal information that you no longer believe to be relevant is considered for erasure, please contact [complianceoffice@wycombeabbey.com](mailto:complianceoffice@wycombeabbey.com) However, please bear in mind that we will often have lawful and necessary reasons to hold on to some personal information even following such a request.

## YOUR PRIVACY RIGHTS

With respect to your personal data, you have:

- **The right to be informed** - a right to know about our personal data protection and processing activities, details of which are contained in this notice
- **The right to access** - the right to request a copy of any personal data that we have about you
- **The right to rectification** - the right to request a correction of any errors in or update of the personal data that we have about you
- **The right to erasure** (*the 'right to be forgotten'*) - the right to request that your personal data is deleted from our records
- **The right to restrict processing**- the right to request that we no longer process your personal data in certain ways, whilst not requiring us to delete the same data
- **The right to object to processing** - the right to request that your personal data will not be processed
- **The right to data portability** - the right to request that your personal data be transferred or exported to another organisation
- **The right to withdraw consent** - the right to withdraw any permission you have given us to process your personal data
- **Rights in relation to automated decision making and profiling**-
  - The right not to be subject to automated decision-making (including profiling) when those decisions have a legal (or similarly significant effect) on you
  - The right to request that your personal data will not be used to contact you for direct marketing purposes

All Subject access requests (SARs) and other requests or notifications in respect of your above rights must be sent to us in writing to: [complianceoffice@wycombeabbey.com](mailto:complianceoffice@wycombeabbey.com)

We will comply with such requests as soon as possible but in any event we will comply within one month of receipt (unless a longer period of time to respond is reasonable by virtue of the complexity or number of your requests).

## DATA ACCURACY AND SECURITY

We will endeavour to ensure that all personal information held in relation to you is as up to date and accurate as possible. You must please notify us of any significant changes to important information, such as contact details.

You have the right to request that any out-of-date, irrelevant or inaccurate information about you is erased or corrected (subject to certain exemptions and limitations under Data Protection Law).

We will take appropriate technical and organisational steps to ensure the security of personal information about individuals, including policies around use of technology and devices, and access to systems. All staff and governing council members will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

## TRANSFERRING YOUR INFORMATION OUTSIDE THE UK or EEA

We will not transfer your personal data in a systematic way outside of the European Economic Area or UK (together the "EEA") but there may be circumstances in which certain personal data is transferred outside of the EEA, in particular:

From time to time, some of our data processors (including third party payment processors, server providers, transport partners), may be based outside of the EEA. In that case, we will ensure we have an agreement in place with such processors to provide adequate safeguards and a copy of such safeguards will be available on request.

If you use our services while you are outside the EEA, your information may be transferred outside the EEA in order to provide you with our services or communicate with you.

We may communicate with individuals or organisations outside of the EEA in providing our services. Those communications may include personal data (such as contact information).

From time to time your information may be stored in devices which are used by our staff outside of the EEA (but staff will be subject to our cyber-security policies).

If we transfer your information outside of the EEA, and the third country or international organisation in question has not been deemed by the EU Commission to have adequate data protection laws, we will provide appropriate safeguards and we will be responsible for ensuring your privacy rights continue to be protected as outlined in this notice.

## THIS POLICY

We 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.

## QUERIES AND COMPLAINTS

The Data protection Lead is the person responsible for managing how we look after personal information and deciding how it is shared.

Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly, treat the information we obtain fairly.

Please contact us if:

- you would like us to update the information we hold about you; or
- you would prefer that certain information is kept confidential.

Any comments or queries on this policy should be directed to [summerprogramme@wycombeabbey.com](mailto:summerprogramme@wycombeabbey.com)

If you believe that we have not complied with this policy or acted otherwise than in accordance with Data Protection law, you should utilise the complaints procedure and should also notify us. 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 us before involving the regulator.

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