

## Data Privacy Notice – Pupils and Parents

### Applies to:

- All staff (teaching and non-teaching), the directors and volunteers working in the School.
- Pupils, Parents, Guardians and Caregivers and Prospective Pupils
- Visitors and Contractors

### Availability:

This policy is made available in the following ways:

- The School's website [www.radnor-sevenoaks.org](http://www.radnor-sevenoaks.org);
- Via Teams, All Staff Shared Documents, Compliance, Policies;
- On request a copy may be obtained from the School's Office.

### Monitoring and Review:

- This policy will be subject to continuous monitoring, refinement and audit by the Head.
- The Board of Directors undertake a formal annual review of this policy.

Signed:



David Paton  
Head



Ian Davies  
Chairman of the Board of Directors

**Reviewed: September 2024**  
**Next Review: September 2025**

## 1. Introduction

Radnor House Sevenoaks (“the School”) is committed to safeguarding all personal data relating to its pupils, their parents and/or guardians, staff and others with whom it deals. This Data Protection Notice (“the notice”) sets out how the School will treat personal data entrusted to its care and should be read in conjunction with the School’s Data Protection Policy.

Radnor House Sevenoaks is the “Data Controller” of your personal data. We are registered with the Information Commissioner’s Office (ICO) (our notification number is Z1714818) and we are committed to ensuring that the personal data we process is handled in accordance with data protection legislation. The first point of contact for any query regarding data protection is the Director of Finance and Operations.

One of our responsibilities is to tell you about the different ways we collect and use your personal data. This statement provides details about these uses. In addition to this statement, you may be given further information about the uses of your personal data when you use certain services offered by the School. This Notice should be read in conjunction with the School’s Data Protection Policy

## 2. What information do we collect from you?

The School processes both personal and sensitive personal data strictly in accordance with the DPA 2018 and the General Data Protection Regulation (GDPR) 2018. Whilst the majority of information provided to the school is mandatory for the fulfilment of the contract between the School and the individual, some of it is provided on a voluntary basis. In order to comply with GDPR, the School will ask for the individual’s specific consent, when necessary.

Under data protection legislation (GDPR 2018, and DPA 2018) we are only allowed to collect the minimum amount of personal data that we need to carry out a specific purpose. The data we hold and process about you is information to help identify you:

- First name, last name, date of birth
- Contact information (email address, postal address, phone numbers)
- National Insurance Number (or other Tax Identification number)
- Passport Number (or National Identity Card details)
- Country of domicile and nationality
- Nationality
- School URN and username
- Financial eligibility information (for example to determine entitlement to free early years education) □ Attendance information (such as sessions attended, number of absences and absence reasons).

Information relating to your education history:

- Name and address of any previous school(s) pupil attend(ed)
- Dates of study and exam results

Information about your family, personal or lifestyle circumstances, extra-curricular interests or information to help assess your suitability to receive a bursary or to provide you with appropriate

pastoral care.

The School may process some information about you that is classed as 'sensitive' data in this category. Special category data receives additional protections. The sensitive data we collect about you is:

- gender
- data relating to health and medical conditions
- racial or ethnic origin
- religious or similar beliefs
- sexual orientation
- criminal convictions (where relevant to assessing your suitability for certain courses of study)

We collect data about you at various stages in your relationship with us. The main stages are:

- when you apply to come to the school and complete an application form
- when we validate your academic achievements with a previous school (if applicable) when you register with us as a pupil
- when necessary, from third party sources (for example, UCAS, Government Departments such as the Home Office). Where we obtain personal data from third party sources, we will look to ensure that the third party has lawful authority to provide us with your personal data
- when you communicate with us, via phone, email or via the website. The School records those telephone calls made to/from the School via the new VOIP handsets – these recordings are not routinely monitored, but only accessed in response to a specific issue, and are automatically deleted after 12 weeks. Please see the school Data Protection Policy for further information
- throughout your time as a pupil, collating information relating to your work, examinations and other information in your Pupil Record
- through engagement with school services, such as careers advice, counselling and financial support.
- when/if you go on a placement/work experience as part of a course

### **3. Why do we collect this information?**

The School collects only the data we need and we keep the data up to date and only for as long as it is needed. We take our obligations for data handling very seriously and it is therefore important for you to know that we process your personal data on the following legal bases:

We process data to ensure that we can carry out our role as an educational establishment - We process data to meet this role when we carry out activities to meet our teaching and learning obligations such as:

- pupil administration, including registration, provision of pupil ID, timetabling, maintenance of the pupil record
- provision of core teaching, learning and research services, including assessment, managing progress, academic investigations
- check and calculate free entitlement to free early years education
- quality assurance processes around development and upkeep of courses and lessons, pastoral care and support

We also process data to meet our statutory and legal requirements - We process your data for this purpose when we:

- perform monitoring and gathering of information to meet equal opportunities obligations
- report to governmental bodies
- ensure we are meeting our obligations under equality legislation

We also process data to meet our contractual duties to you as a pupil and provide you with educational and other services as laid out in our Terms and Conditions with you. We process data to meet our contractual obligations when we:

- manage your use of facilities and participation in events
- provide email and other IT services, access to the school networks and Wi-Fi, IT accounts and library services
- administer the financial aspects of your relationship with the school, such as fee payment

We also process data in our legitimate interests - This is an assessment made by weighing our need to process your data against the impact of the processing on you. Our legitimate interests will never override your right to privacy and the freedoms that require the protection of your personal data.

We process data for these purposes when we:

- provide opportunities for pupil wellbeing and support, including pastoral support, counselling services, personal tutoring, and careers advice
- administer financial support services such as assessing eligibility for bursaries and scholarships
- enable effective communications with you regarding information you need to know for school security or operations
- operate and keep a record of disciplinary and complaint issues
- ensure the security of the School campus and those people within it via CCTV
- produce statistics and research for internal improvements in the way the School develops and delivers its courses

We process data for reasons of substantial public interest - We process special category data for the purpose of substantial public interest. This is an assessment made by weighing our need to process your special category data against the impact of the processing on you. We will always ensure that the processing respects the essence of the right to data protection. We process for this purpose when we:

- operate and keep a record of disciplinary and complaint issues, including managing any appeals to these process

We process data with your consent - We may process special category data with your consent where we use it:

- to operate and keep a record of any additional learning support processes you require
- to operate and keep a record of any extenuating circumstances you require

#### **4. What do we do with your information?**

The School processes personal data and sensitive personal data in accordance with data protection legislation and its own Data Protection Policy.

We combine the data provide to us on acceptance of the School place, with other data generated during your time with the School in order to maintain a summary record of your academic journey with us which is stored in our pupil management system within school networks.

Keeping in touch and supporting the school – the school will use the contact details of parents, alumni and other members of the School community to keep them updated about the activities of the School. This will include sending updates and newsletters by email and by post.

The School may also share contact details of parents, staff and/or alumni, as appropriate, with partner organisations set up to help establish and maintain relationships with the School community, including (not exclusively) the Friends of Radnor House Parents' Association (FoRH). Anyone wishing to limit or object to any such use, or seeking further information, should contact the School.

The data is used for the purposes described above to meet the following primary purposes:

- Pupil administration, including registration, timetabling, maintenance of the pupil record;
- Provision of core teaching and learning services, including disciplinary and complaint processes.
- Provision of email and other IT services, access to the school networks and Wi-Fi, IT accounts and library services.
- Pupil wellbeing and support, including pastoral support, counselling services, personal tutoring, and careers advice.
- Financial administration, including fee payment, and assessing eligibility for bursaries and scholarships.
- Management planning and forecasting, research and statistical analysis.
- Complying with statutory requirements, such as monitoring equal opportunities.
- Maintaining records as required by law (such as health and safety records, employment records, financial records, DBS check records and statutory reporting records).
- Keeping pupils, parents and alumni, and employees informed about relevant matters relating to the School.
- Marketing and promoting the School and its courses.

## **5. How long do we keep your information?**

We keep your personal data for as long as it is required to perform its purpose or for as long as is required by law. These periods are defined in our data retention schedules which are available by contacting the Director of Finance and Operations.

## **6. How do we protect your data?**

We take the security of your data seriously. The School will take all reasonable measures to prevent the loss, misuse or alteration of your personal data. The School maintains data security by protecting the confidentiality, integrity and availability of this data, defined as follows:

- Confidentiality means that only people who are authorised can access it, in the performance of their duties;
- Integrity means that any data held should be accurate and suitable for the purpose for which it is needed;
- Availability means that individuals should be able to access the information if they need it for authorised reasons.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions contained within a contract, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data. These suppliers must be fully compliant with GDPR and DPA.

## **7. Who do we share your information with?**

Your information may be shared internally with:

- academic staff, pupil support staff, the teachers involved in delivering the courses of study.
- finance teams, library, counselling and pastoral staff, if access to the data is necessary for performance of their roles.
- IT Services, in order to provide you with an IT account, email address and access to relevant buildings, IT networks, systems and resources.

We may also share sensitive data internally to provide you with support. This will usually be done only with your consent but it may happen where it is necessary to protect your vital interest, or the vital interest of others, and we are unable to get consent from you.

Sometimes we need to share your personal data with third parties to help us to meet our contractual needs or to provide a better service. We also share data to meet our statutory and regulatory requirements or as required by law for crime prevention, investigation or detection purposes. We also share data where you request us to do so to provide references.

We share your personal data (including sensitive personal data), where required, with the following external third parties (after authorisation to do so is received from the Head, Head of Prep, or Director of Finance and Operations):

- Our employees, agents and contractors where there is a valid reason for their receiving the information:
  - third parties who provide IT support.
  - third parties who support financial transactions.
  - third parties who provide our virtual learning environment.
  - third parties who provide specialist teaching services e.g. to the Radnor House Swim School.
  - external auditors, to ensure school compliance with policies and processes.
  - third parties who act on our behalf to recover money you owe to us.
  - health professionals involved in the care of our pupils.
- Those with an interest in tracking pupil progress and attendance:
  - Current or potential education providers or employers, to provide references.
  - Government departments and agencies where we have a statutory obligation to provide information
  - Partner organisations signed up to the Kent & Medway Information Sharing Agreement, where necessary, which may include Police, and Kent Community Health NHS Foundation Trust

- The Independent Schools Inspectorate (ISI)
  - The Independent Schools Council (ISC)
  - The Home Office (in connection with UK visas and immigration)
  - DfE – we are required by law to provide information about our pupils to the DfE as part of a statutory census programme, This is then stored on the National Pupil Database
  - Local multi-agency forums which provide SEND and other advice, support and guidance
- Crime prevention or detection agencies, if required, by applicable law
    - The police

The school may sometimes need to transfer personal information overseas. When this is needed, any transfers made will be in full compliance with all aspects of the DPA and GDPR.

## **8. What rights do you have in relation to the way we process your data?**

As an individual whose data we process (a data subject), you have certain rights in relation to the processing. You can find detailed information about your rights as a data subject in the School's Data Protection Policy. You have the right to:

- withdraw your consent for us to process your personal data where you have provided us with consent previously.
- ask to access (i.e. have a copy) that data.
- request that we rectify any inaccuracies where the data we hold on you is inaccurate or incomplete.
- have your data erased by us, although in certain circumstances we may not be able to do this.
- restrict the processing of your personal data in certain ways.
- obtain your personal data for reuse.
- object to certain processing of your personal data, where it is likely to cause damage and distress.

The School will treat as confidential any reference in the School's possession which has been prepared or given to UCAS, and any reference for current or prospective education, training or employment of a pupil or staff member.

The School acknowledges that an individual may have a right of access to a reference which the School receive about them from another source. Such reference will only be disclosed, however, if:

- Disclosure will not identify the source of the reference; or
- The referee has given consent; or
- Disclosure is reasonable in all the circumstances.

## **9. How to enforce your right to review and amend personal data**

As data subjects, under DPA and GDPR individuals have a general right to be given access to personal data held about them, unless an exemption applies (see the School's Data Protection Policy for details). An individual wishing to access their personal data held by the School should put their request in writing to the School, either as a hard copy letter or an email. The School will respond to a

request for access to records within one month of receiving the request (or earlier if practicable).

In line with GDPR, the School will ensure that the personal data it processes is adequate, relevant and not excessive, and also accurate and up-to-date. Individuals should notify the School of any significant changes to important information, such as contact details, that the School holds about them.

In exercising the right to access personal data, the presumption under DPA is that by the age of thirteen a pupil has sufficient maturity to understand his/her rights and can make a request for access for their personal data if they wish. A parent or guardian would normally be expected to make a request on a child's behalf if the child is younger.

#### **10. Changes to this notice**

The School may periodically update this notice, by posting a new version on our website. You should check this page regularly to ensure that you are happy with any changes.

#### **11. Contact details**

If you have any questions or queries in relation to this notice or exercising your rights under the DPA, please contact the School Finance and Operations Manager at Radnor House Sevenoaks, Combe Bank Drive, Sevenoaks, TN14 6AE or by telephone on 01959 563720.

If you have concerns about the use of your personal data, the Information Commissioner's Office is an independent body set up to uphold information rights in the UK. They can be contacted through their website: [www.ico.org.uk](http://www.ico.org.uk), or their helpline on 0303 123 1113, or in writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.