



<b>Policy Title:</b>	PRIVACY NOTICE FOR PARENTS	<b>Website</b>
<b>Author:</b>	Head of Operations	Checked by: The Head
<b>Date of most recent review:</b>	September 2025	
<b>Date of next review:</b>	September 2026	

### Parent Privacy Notice - Key Information

This privacy notice provides the key information about **how** and **why** we collect your personal data, and **what** we do with that information.

Personal data is information about you from which you can be identified (either directly or indirectly). For example, information about your family circumstances, your financial information and images of you.

We use your personal data to:

- fulfil our obligations and enforce our rights under the contract with you;
- teach your child and other pupils;
- look after your child and others, including other pupils and staff;
- enable the School to comply with its legal obligations, support the management and operation of the School, and to advance and protect the School's interests, objectives and reputation; and
- fundraise, market and promote the School, for example, by contacting you about fundraising for a new school project.

We set out below examples of how we use your personal data and the sources from which it is obtained:

- We obtain information about you from admissions forms (including our registration form) and from your child's previous school(s) and/or nurseries. We may also receive information from professionals, such as doctors, and from local authorities;

- We will process information about you for fee payments and for risk management and compliance purposes. In some cases, we receive information from third parties such as credit reference agencies or your child's previous school(s) and/or nurseries;
- We may take images (including video recordings) of you at school events to use on social media and the School website. This is to show prospective parents and pupils what we do and to promote the school. We may continue to use these images after your child has left the School;
- We will send you information to keep you updated on school activities, for example, details of events, including fundraising, and the school newsletter;
- We will keep your address details after your child leaves the School to keep you informed about school events and activities and to follow your child's progress. We may also pass your details to the alumni organisation which is called Duke of Kent School Alumni Association. Further information on the alumni association can be found here; <https://www.dukeofkentschool.org.uk/page/?title=Duke+of+Kent+School+Alumni+Association&pid=127>

In some situations, we may need to share your personal data with third parties. Examples include:

- In accordance with our legal obligations, we may share information with government bodies and regulators such as the Independent Schools Inspectorate / Ofsted, the Department for Education and local authorities, for example, where there are any safeguarding concerns;
- If you have unpaid fees, we may share information about this with any other school, or educational establishment, to which you intend to send your child;
- On occasion, we may need to share information with the police or other law enforcement authorities, our legal advisers and/or our insurers and their representatives; and
- If your child has an educational guardian, we may need to share information with them and/or with any homestay appointed to provide accommodation.

You have the following rights concerning your personal data:

- correction of information held;
- access to information held;
- deletion of information (in certain circumstances);
- the transfer of information to you or a third party;
- restriction of the use of information; and
- the right to object to the use of information (in certain circumstances).

These rights are explained in more detail in the privacy notice, and the Data Protection Lead can provide you with any further information you may require. These rights do not apply in all cases and may be subject to exemptions.

We strongly recommend reading the full version of our parent privacy notice which is published on the School's website under the section "School information and policies" or follow the link;

<https://www.dukeofkentschool.org.uk/independent-prep-guildford-surrey/information-policies>

You can also obtain a copy of the full privacy notice by contacting the School by telephone 01483 277313 or by email, [office@dokschoo.org](mailto:office@dokschoo.org)

The full version includes additional points, such as:

- further details on the purposes for which we use your information;
- how long the School retains your personal data; and
- our lawful bases for using your personal data.

The Data Protection Lead is the person responsible at our school for managing how we look after personal data. The Data Protection Lead can answer any questions which you may have about how we use your personal data.



## **Parent privacy notice**

### **Introduction**

This privacy notice is for parents and carers of our prospective, current and former pupils. Where the notice refers to “parents” this includes all individuals with overall responsibility for pupils, such as biological or adoptive parents, those with parental responsibility, and/or those who care for a pupil.

This privacy notice provides key information about **how** and **why** we collect your personal data, and **what** we do with that information. It does not, and is not intended to, give you any rights which you did not already have, for example, it does not give you any additional contractual rights.

The School is the controller of your personal data, and our contact details are [office@dokschool.org](mailto:office@dokschool.org)

The Data Protection Lead is the person responsible at our School for managing how we look after personal data and if you have any questions, please direct these to [office@dokschool.org](mailto:office@dokschool.org)

### **What is "personal data"?**

Personal data is information about you from which you can be identified (either directly or indirectly). For example, information about your family circumstances, your financial information and images of you.

### **Where we get your personal data from and who we share it with**

We obtain your personal data from a number of different sources. We receive a lot of information directly from you, for example, when you complete the registration form. We also receive information from other sources such as our teachers, your child, your child's previous school(s) and / or nurseries, other members of your family, other pupils and their parents, as well as from individuals outside of the School.

We may also get information about you from government and from regulators, for example, from the local authority.

We will also share information with these individuals and organisations where appropriate. For example, if you tell us about something that has happened at home, we may share this with your child's teachers if it is relevant.

The sections below contain further information about where we get your personal data from and with whom it is shared.

### **Why we use your personal data and the lawful bases**

We use your personal data in order to:

1. fulfil our obligations and enforce our rights under our contract with you;
2. teach your child and other pupils;
3. look after your child and others, including, other pupils and staff;

4. enable the School to comply with its legal obligations, support the management and operation of the School and to advance and protect the School's interests, objectives and reputation; and
5. fundraise, market and promote the School, for example, by contacting you about fundraising for a new school project.

Our lawful bases for using your personal data are as follows:

- **Contract:** We need to use your personal data to meet our obligations under our contract with you and so that you can meet your obligations to us. For example, we need your name and contact details to update you on your child's progress. We may also rely on this basis if you have asked us to take steps prior to entering into a contract with us.
- **Legitimate interests:** This means that the School is using your personal data where this is necessary for the School's legitimate interests or someone else's legitimate interests.
  - Specifically, the School has a legitimate interest in:
    - educating and looking after its pupils;
    - complying with its contract with you for your child to be at the School;
    - enforcing our rights against you, for example, by contacting you if unpaid school fees remain unpaid;
    - investigating if something has gone wrong; and
    - protecting, promoting and improving the School.
  - This lawful basis only applies where our legitimate interests are not overridden by your interests, rights or freedoms. It applies to all five purposes listed above.
- **Public task:** This allows the School to use your personal data where it is necessary to perform a task in the public interest or to exercise one of the School's official functions or powers. This basis applies to purposes 2, 3 and 4 above, for example, when we use your personal data to teach and look after your child.
- **Legal obligation:** The School may need to use your personal data to comply with a legal obligation, for example, reporting a concern about your child's wellbeing to Children's Services or in connection with inspections.
- **Vital interests:** In limited circumstances, we may use your personal data to protect your vital interests or those of another person, for example, to prevent serious harm of death.

The section below contains more information about our purposes for using your personal data and the lawful bases.

## Our purposes and lawful bases in more detail

This section provides more detail on the purposes for which your personal data is used, the applicable lawful bases, as well as further information about sources and recipients.

We have used a colour coded system so that you can see which bases we are relying on for each of the purposes described at paragraphs 1 to 46 below. **LI** means legitimate interests, **CT** means contract, **PI** means public task, **LC** means legal obligation and **VI** means vital interests. So, if we have put **(LI, PI)** that means we are relying on both legitimate interests and public task for that purpose.

- 1 The School's primary reason for using your personal data is to provide educational and pastoral services to your child (LI, CT, PI).
- 2 We will use information about you to process your child's admission application. This information comes from admissions forms, your child's previous school(s) and / or nurseries, and sometimes from professionals such as doctors and local authorities (LI, CT, PI).
- 3 We will have information about any family circumstances that might affect your child's welfare or happiness. This helps us provide appropriate care and support to your child (LI, CT, PI).
- 4 We may use medical information about you when necessary to look after your child (LI, CT, PI).
- 5 We will hold information about any court proceedings, court orders, or criminal petitions relating to you. This is to safeguard the welfare and wellbeing of your child and other pupils at the School (LI, CT, PI).
- 6 We use CCTV to help keep the School premises safe, and for crime detection and prevention. CCTV may also be used in relation to complaints and incidents on our sites, for example, accidents involving vehicles in our car park(s). Images captured by CCTV are your personal data. CCTV is not used in private areas such as toilets or changing rooms (LI, CT, PI, LO). For more information about our use of CCTV please see our CCTV Policy which is published on the school's website under the section "School information and policies".
- 7 We will use your personal data to take other steps to ensure the safety of the School premises and buildings, for example, by keeping a record of visitors to the School premises at any given time (LI, PI, LO).
- 8 If there is a complaint or grievance made to the School that involves you, we will use your personal data in connection with that complaint or grievance (LI, PI).
- 9 The School may share information about you with the local authority to prepare, implement and / or review your child's Education and Health Care Plan ("EHCP") (LI, PI, LO).
- 10 Where appropriate, the School will hold information about your religious beliefs or other practices. For example, dietary restrictions. (LI, PI).
- 11 We may use your personal data to help improve the School, for example, to raise money for the School (LI). For more information, please see our fundraising and development privacy notice held in the policies section of the School's website.
- 12 We may take images (including video recordings) of you at School events to use on social media and the School website. This is to show prospective parents and pupils what we do and promote the School. We may continue to use these images after your child has left the School (LI).
- 13 We will send you information to keep you up to date with what is happening at the School, for example, by providing details about events and activities (including fundraising events) and sharing the School newsletter (LI).
- 14 We will keep your address details after your child leaves the School to keep you informed about school events and activities, and to follow your child's progress (LI).
- 15 We may use your personal data when ensuring network and information security, for example, our anti-virus software might scan files containing information about you (LI).

- 16 We monitor pupils' use of the internet, internet based platforms and email as part of our safeguarding duties. This may sometimes involve your personal data, for example, if you have sent your child a message to their school email address (PI).
- 17 We also keep certain information indefinitely for archiving purposes referred to as "archiving in the public interest" under data protection law and for historical research purposes. For example, we retain some old images to record what the School was like in the past. Information held in our archive may be made publicly available, but only in compliance with data protection laws. (LI, PI).
- 18 We may use your personal data in connection with legal disputes, for example, we may have to disclose your personal data as part of court proceedings (LI, PI, LO).

#### Financial information

- 19 We will process information about you for fee payments, and for risk management and compliance purposes. In some cases, we may receive information from third parties such as credit reference agencies or your child's previous school(s) and / or nurseries (LI, CT).
- 20 We may ask you to provide evidence of your identity, such as a copy of your driving licence or passport to keep a record of who is paying the fees for anti-money laundering purposes (LI).
- 21 We will hold information about bankruptcy petitions and statutory demands, where relevant (LI, CT).
- 22 We may search the files of licensed credit reference agencies to verify your identity. This also helps us assess your application for a bursary or for credit to defer fees. The credit reference agency will keep a record of this search and your application details, which may be visible to other organisations that carry out searches on you (LI, CT).
- 23 We may share your personal data with debt recovery agencies if you do not pay our fees or any other sums owed to the School (LI, CT).
- 24 We may obtain information about you from publicly available sources, such as Companies House and Zoopla, to verify your identity or other personal details and to assess your ability to pay School fees (LI, CT).]
- 25 If you apply to the School for a bursary, we will use the information that you provide to assess your application (LI, CT).

#### Sharing personal data with others

- 26 We will share information with local authorities, the Independent Schools Inspectorate / Ofsted and the Department for Education, for example, where there are safeguarding concerns or to comply with our legal obligations. These organisations may also share information with us for these purposes (LI, LO, PI).
- 27 We may need to share your personal data with the police, or other law enforcement authorities, but only in specific circumstances and where necessary to assist with investigations (LI, CT, LO, PI).
- 28 We may need to share information about you with the Health and Safety Executive where there is a health and safety issue at the School (LI, LO, PI).
- 29 We may also need to share information with our legal advisers for the purpose of obtaining legal advice (LI, LO, PI).

- 30 Occasionally, we may use consultants, experts and other advisers to assist the School in fulfilling its obligations and operate effectively. For example, this could include accountants or PR specialists. We will share your personal data with them only when relevant to their work (LI, CT, PI).
- 31 We may share information about you with, and receive information from, health authorities, healthcare providers and professionals, for example, regarding pupil immunisations. (LI, PI).
- 32 If your child is not a British or Irish national, we must verify their right to study in the UK. Sometimes the government will require us to provide information as part of our reporting obligations. In addition, we have a duty to share information about you with UK Visas and Immigration to comply with our duties as a Child Student sponsor. (LI, CT, LO, PI).
- 33 If your child is sponsored by us under a Child Student or Student Visa, we are required to provide information about them to UK Visas and Immigration to fulfil our duties as their sponsor. (LI, CT, LO, PI)
- 34 The School is a charity which means that in exceptional circumstances we may need to share your personal data with the Charity Commission, for example, in the event of a serious incident (LI, LO, PI).
- 35 We may share some information with our insurance company to make sure that we have the insurance cover that we need or in connection with an actual or possible claim (LI, PI).
- 36 If the School is handling a request for information, query, complaint, or grievance, for example, from another parent, we may need to share your personal data with relevant parties including appropriate staff, pupils, parents or governors, where it is necessary and appropriate (LI, PI).
- 37 If you have unpaid fees, we may share information about this with other schools or educational establishments to which you propose to send your child (LI).
- 38 If your child leaves to attend another school, we may share information about you with that school, for example, details relating to family circumstances or safeguarding concerns (LI, LO, PI).
- 39 We may share information about you with other family members where necessary to care for your child, to comply with legal or regulatory obligations, or in relation to school fees (LI, PI).
- 40 We may need to share information in an emergency, for example, if you are injured while on School premises (LI, VI).
- 41 If you have appointed an agent to act on your behalf, we may share information with them. (LI).
- 42 If you have appointed an educational guardian (and/or there is homestay arrangements) for your child, we may share your personal data with them (LI).
- 43 If your child has an **EHCP**, we will share information with and obtain information from the local authority about you (LO, PI).
- 44 If, in the future, we are consider restructuring the charity that operates the School, we may share your personal data with the involved parties and relevant professional advisers (LI).
- 45 Some records held by the School containing your personal data may be used by the School or third parties (such as government bodies) to assess the School's performance (LI, PI).

- 46 We may share your personal data with the School's governors if it is necessary for them to be aware of it or to fulfil their governance role, for example, concerns involving you or your child, or issues affecting the school's operation (LI, PI).

As you will see above, in some cases we rely on more than one lawful basis for a particular use of your information.

We use service providers to handle personal data on our behalf for the following purposes:

- we engage IT consultants who may access information about you when checking the security of our IT network;
- we use software, apps and websites to support teaching and pastoral care, for example, we use an app that allows pupils to access homework set by their teachers; and
- we use third party "cloud computing" services to store certain information, rather than keeping it on the School's premises.

We may share your personal data with any of the representatives or advisers of any of the third parties mentioned in this privacy notice. Likewise, these parties may also provide us with information about you.

## **Consent**

We may ask for your consent to use your information in certain ways instead of relying on the lawful bases above (LI or PI). For example, we might ask your consent to send you fundraising information by email.

You can withdraw your consent at any time. However, any use of your personal data before you withdraw consent will remain lawful.

You can speak to the Data Protection Lead if you would like to withdraw any consent given.

## **Sending information to other countries**

When the School sends personal data outside of the UK, we have to consider whether the recipient country has an adequate level of protection for this personal data. Some countries are considered by the UK Government to have adequate rules including all of the European Economic Area and some other countries, such as, New Zealand, Argentina and Switzerland.

The School sends your personal data to countries with adequate rules when we:

- store your personal data in cloud computer storage with servers in Ireland;

In certain circumstances, we may send your personal data to countries which do not have the same level of protection for personal data as there is in the UK. We may:

- store your personal data on cloud computer storage based in the USA;

We will provide you with additional details about where we are sending your personal data, whether the country has an adequacy finding and if not the safeguards which we have in place outside of this privacy notice.

## **For how long do we keep your personal data?**

We keep your personal data for as long as we need to for the purposes set out in this privacy notice.

In certain circumstances, we may retain your personal data for longer than usual, but only where we have a valid reason and are permitted to do so under data protection law.

Please see our information and records retention policy for more information. This can be found on our website here <https://www.dukeofkentschool.org.uk/independent-prep-guildford-surrey/information-policies>

### What decisions can you make about your information?

- **Correction:** If the School holds about you is incorrect or incomplete information about you, you have the right to ask us to correct it.
- **Access:** You have the right to ask what information we hold about you and to request a copy. This is known as making a subject access request. We will provide you with additional details, including why we use your information, where it came from, and who we have shared it with.
- **Deletion:** You can request that we delete the information we hold about you in certain circumstances such as when it is no longer needed.
- **Portability:** You can request that your personal data be transferred to you or a third party in a computer readable format.
- **Restriction:** You can request that we restrict how your personal data is used in certain circumstances.
- **Object:** You have the right to object to us using your personal data in the following circumstances:
  - where we are using it for direct marketing purposes, for example, sending you an email about fundraising opportunities;
  - where the lawful basis on which we are relying is either legitimate interests or public task. Please see the section "Our purposes and lawful bases" above; and
  - if your personal data is ever used for scientific or historical research or statistical purposes.

Some of these rights may not apply in all cases. For example, if you request deletion of your personal data, we may not always be required to comply with your request.

### Further information and guidance

Please speak to the Data Protection Lead if:

- you would like further information about any aspect of this privacy notice;
- you would like to exercise any of your rights listed above;
- you would prefer that certain information is kept confidential. Please note that there will be occasions when your expectation of confidentiality is overridden by the School's other obligations, for example, if we need to share information for safeguarding reasons.

If you do not provide certain information when requested, we may be unable to fulfil our contractual obligations to you. We may also be unable to comply with our legal duties, such as safeguarding your child and their classmates. Additionally, failing to provide this information could affect the education and care we are able to offer your child.

If you are unhappy with how we have handled your personal data, you have the right to complain to the IOC (Information Commissioner's Office). However, we kindly ask that you contact us first so we have the opportunity to resolve any concerns before you escalate the matter.

**Last Updated: September 2025**