



DAUNTSEY'S SCHOOL

PRIVACY NOTICE

1. WHO WE ARE

We are Dauntsey's School, a company registered in England and Wales (the "School"). Our company registration number is 5872694, our charity registration number is 1115638 and our registered office is at Dauntsey's School, High Street, West Lavington, Devizes, Wiltshire, SN10 4HE.

2. WHAT THIS PRIVACY NOTICE IS FOR

This Privacy Notice explains how Dauntsey's School collects, uses, and shares personal information about pupils, staff, and their parents or carers (called 'parents' in this Notice).

Dauntsey's School is the data controller. This means we are responsible for how and why we use your personal information, and this Privacy Notice sets out how we will use that information and what your rights are in respect of the data we hold about you. Staff, parents and pupils are all encouraged to read this Privacy Notice and understand the School's obligations to its entire community.

This Privacy Notice applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Notice also applies in addition to the School's other relevant terms and conditions and policies, including:

- any contract between the School and its staff or the parents of pupils;
- the School's policy on taking, storing and using images of children;
- the School's retention of records policy;
- the School's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and

- the School's IT policies, including its Acceptable Use policy and Bring Your Own Device policy.

Anyone who works for, or acts on behalf of, the School (including staff, volunteers, governors and service providers) should also be aware of and comply with this Privacy Notice and the School's Data Protection Policy which also provides further information about how personal data about those individuals will be used.

3. RESPONSIBILITY FOR DATA PROTECTION

The School has appointed the Bursar as the School's Data Protection Officer, who will deal with all your requests and enquiries concerning the School's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law.

4. WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

To carry out its day-to-day responsibilities to pupils, parents and staff, Dauntsey's School must collect and use a range of personal information. Some data processing is necessary to meet our legal obligations or to carry out our contractual duties. In other cases, we rely on our legitimate interests, as long as this does not unfairly impact the individual and does not involve sensitive personal data.

Depending on the context, we may process personal data under one or more lawful bases including: to comply with our legal obligations, to perform a contract, with consent, or where we have a legitimate interest that does not override your rights. The School expects that the following uses will fall within that category of its "legitimate interests":

Admissions and Administration

- Confirming the identity of prospective pupils and their parents.
- Promoting the School to prospective parents and pupils.
- Processing applications and keeping records for future admissions.
- Verifying parents' identity, credit history, or source of funds (including sanctions checks).

Education and Pupil Support

- Providing education, including music, sport, careers advice and extracurricular activities, whether in-person or online.
- Monitoring academic progress and educational needs.
- Reporting to parents about pupil progress, behaviour, and welfare.
- Supporting pupils' pastoral care and safeguarding, including compliance with *Keeping Children Safe in Education* (KCSIE).
- Managing special educational needs or medical conditions.

- Enabling pupils to participate in exams or assessments and publishing results or achievements.

School Life and Communication

- Organising meetings, events, trips and social activities for pupils and parents.
- Using pupil photos or videos in publications, the website, or social media (in line with School policy).
- Staying in touch with alumni and the wider School community, including marketing and fundraising.

Compliance and Safety

- Monitoring use of School IT systems in line with our Acceptable Use Policy.
- Using CCTV and other security tools to protect people and property.
- Keeping regulatory records, including immigration compliance (e.g. visa sponsorship).
- Cooperating with public bodies (e.g. police, local authorities) to prevent or detect crime.
- Managing disciplinary, complaint or investigation processes.

External Obligations and Risk Management

- Providing references or academic records to other schools, universities or employers.
- Supporting inspections, audits or performance monitoring by external authorities.
- Managing financial forecasting, legal advice, and insurance for the School.
- Promoting the School to prospective families.
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the school.

Special Category and Criminal Records Data

In some cases, we also need to process more sensitive personal data – known as “special category” data – or criminal records information. We do this where required by law (e.g. for safeguarding or employment checks) or, in limited cases, where we have explicit consent. These uses may include:

- Safeguarding pupil welfare and supporting pastoral or medical care, including sharing relevant information for medical, social protection or safety purposes.
- Complying with public health guidance (e.g. COVID-19 measures).
- Supporting pupils with special educational needs.
- Carrying out staff employment processes such as DBS checks or managing welfare and pensions.
- Using biometric systems (e.g. for access or identification purposes).
- Handling disciplinary or safeguarding investigations involving health, SEN or similar data.

- Meeting legal and regulatory obligations (e.g. diversity monitoring, health and safety, or visa compliance) and to comply with legal obligations and duties of care.

5. TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

This will include by way of example (but not an exhaustive list):

- Names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- biometric information, which will be collected and used by the School;
- bank details and other financial information, e.g. about parents who pay fees to the School;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- personnel files, including in connection with employment or safeguarding;
- nationality and other immigration status information (e.g. right to enter, live and [work or] study in the United Kingdom), including copies of passport information;
- information about pupils' health and medical conditions, special educational needs and family circumstances/living arrangements;
- contact details for next of kin;
- references given or received by the School about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- correspondence with and concerning staff, pupils and parents past and present, and
- images of pupils (and occasionally other individuals) engaging in School activities, and images captured by the School's CCTV system (in accordance with the School's policy on taking, storing and using images of children).

6. HOW THE SCHOOL COLLECTS DATA

Generally, the School receives personal data from the individual directly (including, in the case of pupils, from their parents). 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 data will be supplied by third parties (for example another school, or other professionals or authorities, or third-party service providers who credit and identity check parents and their source of funds); or collected from publicly available resources.

7. WHO HAS ACCESS TO PERSONAL DATA AND HOW IT IS SHARED

Internal Access and Outsourced Processing

Most personal data is accessed only by relevant staff within the School, in line with strict internal protocols and on a "need to know" basis.

However, some services are outsourced - such as cloud-based IT systems and document storage. When this happens, the School ensures that all external providers are contractually bound to keep the data secure and to use it only in line with the School's instructions and data protection law.

Sharing with Third Parties

From time to time, the School - including its Governing Body - may need to share personal information with trusted third parties, including:

- **Educational and administrative partners:**
 - External contractors who support teaching and learning (e.g. visiting music teachers).
 - Examination boards.
 - Independent members of formal complaints panels.
- **Professional advisers:**
 - Legal advisers, insurers, auditors, public relations consultants, and accountants.
- **Regulatory and government bodies:**
 - HMRC, the Department for Education, CAFCASS, the police, the Home Office, local authorities, the NHS or relevant public health agencies.
 - Sector regulators such as the Teaching Regulation Agency, Independent Schools Inspectorate, and the Charity Commission.
- **Corporate and strategic partners:**
 - Third parties and their advisers during a possible or actual merger, restructuring or sale of the School.

All data sharing is carefully managed to ensure compliance with data protection law, and only the information necessary for the specific purpose is disclosed.

8. ACCESS TO, AND SHARING OF, SENSITIVE DATA

Some types of personal data are considered "special category" or particularly sensitive - for example, health, safeguarding, or SEN information. These are handled with extra care and only accessed or shared when strictly necessary.

Health and Medical Information

The School uses medical and health data to meet its legal obligations and to ensure pupil safety and welfare. Access is limited to authorised staff, though relevant details may be shared more widely when needed for:

- Providing care or support during School trips or activities.
- Catering for specific dietary or medical needs.
- Emergency situations or cooperation with health professionals, social services or insurers.

Where appropriate, the School will ask for consent before sharing sensitive health information.

Safeguarding Information

Under the statutory guidance *Keeping Children Safe in Education* (KCSIE), the School is required to record and sometimes report safeguarding concerns - even when not proven - if they meet certain thresholds.

This may include:

- Notes in safeguarding or personnel files.
- Low-level concern records about staff, which may reference pupils or family members.
- Referrals to external agencies such as the police, Children's Services, CAMHS or the Local Authority Designated Officer (LADO).

If a pupil leaves the School, their child protection file will be shared with the next school or college in line with KCSIE. The Designated Safeguarding Lead (DSL) will decide what information should be included to support the child's continued welfare. Where appropriate, the School will consult with parents, but this decision ultimately rests with the DSL.

The School will retain its own copy of the file in line with its Safeguarding and Data Retention policies.

For more information, please refer to the School's [Safeguarding Policy].

9. HOW LONG WE KEEP PERSONAL DATA

The School will retain personal data 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 ordinary staff and pupil personnel files is up to 7 years following departure from the School. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. See our Data Retention and Disposal Policy.

If you have any specific queries about how our data 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 Data Protection Officer. However, please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such a request.

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”).

10. 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, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the School will also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the School community, such as the DSPA and Old Dauntseians’ Association.
- Contact parents and/or alumni (including via the organisations above) by post and email in order to promote and raise funds for the School (and, where appropriate, other worthy causes).

Should you wish to limit or object to any such use, or would like further information about them, please contact the Data Protection Officer in writing. You always have the right to withdraw consent, where given.

Please see our Privacy Notice (Alumni) for specific information about how our Foundation Office uses information.

11. YOUR RIGHTS UNDER DATA PROTECTION LAW

Under data protection law, individuals have a number of rights relating to the personal data that the School holds about them. These include the right to:

- Access your personal information.
- Ask for it to be corrected if it is inaccurate or incomplete.
- Request that it be erased or restricted.
- Object to how it is used.
- Ask for it to be transferred to another organisation (in limited circumstances).
- Withdraw consent, where this is the lawful basis for processing.

Please see our Subject Access Request Policy for more details.

The School will respond to written requests as promptly as possible, and always within the statutory timeframe (usually one month). Complex or multiple requests may take up to two additional months to process.

Requests for Access, Correction of Erasure

We are best able to help when requests are specific and clearly focused. If a request is manifestly unreasonable or repetitive, the School may:

- Ask you to clarify or narrow your request.
- Charge a proportionate fee, if permitted by law.

If you believe that any personal data we hold about you is inaccurate, you can ask us to correct it. However, we are not required to delete or amend opinions, professional judgments, or safeguarding notes unless there is a clear factual inaccuracy. We may instead keep a record of the alternative view.

Information we may not disclose:

You should be aware that the right of access is limited to your own personal data, and certain data is 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 – please see further below), or information which is subject to legal privilege.

There are legal exemptions to some rights of access. We may not be able to share data that:

- Identifies or relates to other individuals (including, in some cases, a pupil's parents or siblings).
- Is protected by legal privilege (e.g. legal advice).
- Consists solely of pupil test or exam answers (though teacher comments may be disclosed).
- Contains exam marks before their official release date.
- Involves confidential references given or received for education, employment or training.

The so-called “*right to be forgotten*” does not always apply. Where the School has a legal obligation or a compelling legitimate interest to keep using your data, we are entitled to do so. All such requests will be considered on a case-by-case basis.

12. REQUESTS BY OR ON BEHALF OF PUPILS

Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the School, they have sufficient maturity to understand the request they are making (see section Whose Rights below). A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

Pupils have the same data protection rights as adults, including the right to make a subject access request.

- Pupils aged 12 and over are generally considered mature enough to make such requests themselves.
- Slightly younger pupils may also be able to do so, depending on their understanding and the nature of the request.
- Parents can act on behalf of their children, but the data still legally belongs to the child.

If a request is not in the child's best interests, the School may refuse to comply or ask for the pupil's own permission before releasing information to a parent.

Parental Requests and Expectations

- Parents do not have an automatic legal right to access their child's personal data. However, the School normally provides educational and pastoral information to those with parental responsibility under the parent contract and in line with the School's Terms and Conditions.
- Where parents are separated, we will usually send the same information to both unless a court order, safeguarding concern or the wishes of the child indicate otherwise.
- All requests — whether from parents or pupils — are considered individually, taking into account the child's best interests and any relevant legal or pastoral factors.

All information requests from, or on behalf of, or concerning pupils whether made under subject access or simply as an incidental request will therefore be considered on a case-by-case basis.

Consent

In some cases, we rely on your consent to use personal data — for example:

- Biometric systems
- Use of images for marketing
- Certain types of fundraising communication

You may withdraw consent at any time. However, in most cases, the School uses personal data based on another lawful reason (such as a contract, legal obligation, or legitimate interest). Consent is not required in these cases, though we will always aim to be transparent.

Whose rights take priority?

Data protection rights belong to the individual whose data is being used — including pupils. However, in many situations, the School can rely on parental authority or notification when processing pupil data (e.g. under the parent contract or on School forms). This is different from relying on consent.

In some situations — particularly where sensitive issues are involved — the School may need to seek the pupil's own consent, depending on their age and maturity.

Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

In general, the School will assume that pupils' consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare. That is, unless in the School's opinion, there is a good reason to do otherwise.

However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the School may be under an obligation to maintain confidentiality unless, in the School's opinion, there is a good reason to do otherwise; for example where the School believes disclosure will be in the best interests of the pupil or other pupils, or if required by law.

Respecting Others' Privacy

Pupils must respect the privacy of others and use personal data responsibly. This forms part of the School's Acceptable Use Policy and School Rules Policy.

Staff are also bound by professional duties to respect privacy and handle personal data appropriately, as outlined in staff policies.

13. DATA ACCURACY AND SECURITY

The School 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 notify the Data Protection Officer of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the School may need to process your data, or who you may contact if you disagree.

The School 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 School systems. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

14. THIS POLICY

The School 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.

Copies of the School's Data Retention and Disposal Policy, Safeguarding and Child Protection Policy, Subject Access Request Policy and Acceptable Use Policy are available on request or via the School website.

15. QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the Data Protection Officer using the following contact details bursar@dauntseys.org.

If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the School complaints/grievance procedure and should also notify the Head of HR. 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.

Bursar (and Data Protection Officer)

Date: July 2025

Next Review: July 2026