Privacy Notice for Older and Younger Pupils

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Contents

Privacy Notice for Older Pupils 3
1. Key Information 3
2. Introduction 5
3. What is "personal data"? 5
4. Where we get your personal data from and who we share it with 5
5. Why we use your personal data and our lawful bases for doing so 5
6. Our purposes and lawful bases in more detail 6
7. Consent 11
8. Sending information to other countries 11
9. For how long do we keep your personal data? 12
10. What decisions can you make about your personal data? 12
11. Further information and guidance 13

Privacy Notice for Parents of Younger Pupils 14
1. Key Information 14
2. Introduction 16
3. What is "personal data"? 16
4. Where we get your child's personal data from and who we share it with 16
5. The purposes for which we use your child's personal data and the lawful bases 16
6. Our purposes and lawful bases in more detail 17
7. Consent 22
8. Sending information to other countries 22
9. For how long do we keep your child's information? 23
10. What decisions can you make about your child's personal data? 23
11. Further information and guidance 24

Privacy Notice for Older Pupils

1. Key Information

1.1 We would like to let you know how and why we collect information about you and what we do with it.

1.2 When we refer to 'the School' or 'we' this means The Vernon Educational Trust Limited, trading as Danes Hill School.

1.3 Information about you is called "personal data". The School uses all sorts of personal data. For example, we use information about how well you are doing at School. We also use any information we need to take care of you. Photos and images (including video recordings)s of you also count as your personal data.

1.4 The School uses your personal data to:

- Teach you and other pupils;
- Make sure that you and others are behaving properly;
- Look after you and other people e.g. your friends;
- Make sure that we comply with the law, are well managed and to protect our interests;
- Advertise the School and tell people about the School and what we do here e.g. we may use photos of you in our prospectus, on our website or on social media

1.5 Here are some examples of how we use your personal data and where that personal data comes from.

- Admissions forms give us lots of personal data. We get information from you, your parents, your teachers and other pupils. Your old school also gives us information or a reference about you so that we can teach and care for you. Such references may be requested and received on a confidential basis for the purpose of assessing your prospective education. Where a reference is provided to us in confidence, we will treat it as a confidential reference and may apply the relevant lawful exemption from the right of access under the data protection legislation. Any subject access request will be considered on its individual circumstances, including whether the information constitutes a confidential reference and whether any other exemptions apply exemption from the right of access under data protection legislation.
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  - Sometimes we get information from your doctors and other professionals where we need this to look after you.
  - We may need to report some of your personal data to the government (e.g. the Department for Education). We will need to tell the local authority that you attend the School, if you leave the School or if we have any concerns about your welfare.
  - We tell your parent or guardian about how well you are doing at School. Where fair or legally required, we will also tell them about your behaviour.
  - We may use photos or videos of you to show prospective pupils what we do here and to advertise the School. These photos and videos may be put on the School's website, on our social media or in our prospectus. We may continue to use these photos and videos after you have left the School. Sometimes we use photos and videos for teaching purposes, for example, to record a drama lesson.

- We publish our exam results, sports fixtures and other news on the website. We also put articles and photos in the local news to tell people about what we have been doing.
- We use CCTV to make sure the School site is safe and sometimes to investigate incidents (e.g. where pupils have been misbehaving or someone has been injured). CCTV is not used in private areas such as changing rooms or toilets. For more information about our use of CCTV please see our CCTV Policy available from the Data Protection Lead, which can be contacted via the School Reception.
- We will keep details of your address when you leave so we can keep you updated about what is happening at the School, to tell you about events and activities and find out how you are getting on. We may also pass your details onto the alumni organisation which is called Old Danes. For further information on the alumni association, you can speak to the Director of Marketing.

1.6 You have the following rights regarding your personal data:

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

1.7 These rights are explained in more detail in the full privacy notice, and your form teacher can give you more information. These rights don't apply in all cases.

2. Introduction

2.1 This notice is to help you understand **how** and **why** The Vernon Educational Trust Limited, trading as Danes Hill School, ('**the School**' or '**we**') collects your personal data and **what** we do with that information. It also explains the decisions that you can make about your personal data.

2.2 If you have any questions about this notice, please talk to your form teacher.

3. What is "personal data"?

3.1 Personal data is information about you.

3.2 This includes information such as your name, date of birth and address as well as things like exam results, medical details and information about how well you behave. CCTV images, photos and video recordings of you are also your personal data.

4. Where we get your personal data from and who we share it with

4.1 We get your personal data from lots of different sources. For example, your teachers, parents, your old schools and any future school, other pupils and their parents. We might also get information from the government e.g. the local authority might give us information that we need to look after you.

4.2 Sometimes, we will also share information with these people and organisations, for example, we will tell your parents about how well you are doing at school.

4.3 Below, we give lots of examples of where we get your personal data from, and who we share it with.

5. Why we use your personal data and our lawful bases for doing so

5.1 The School uses your personal data to:

- Teach you and other pupils.
- To monitor and report on your academic progress and attainment
- Make sure that you and others are safe and behaving properly.

- Look after you and other people e.g. your friends.
- Make sure that we comply with the law, are well managed and to protect our interests.
    - Advertise the School and tell people about the School and what we do here e.g. we may use photos of you in our prospectus, on our website or on social media.
    - To meet our duties to the Department of Education and Independent Schools Inspectorate by sharing data with them

5.2 We can only use your personal data if we have a good reason to do so. This is about having a "lawful basis" to use your personal data. Our lawful bases are as follows:

- **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 agreement with your parents for you to be at the School;
        - investigating if something has gone wrong;
        - promoting and protecting the School; and
        - making the School even better.
    - This lawful basis only applies where our legitimate interests are not overridden by your interests, rights and freedoms. Legitimate interests applies to all of the 5 purposes listed above.
- **Public task:** This allows the School to use your personal data where doing so is necessary to perform a task in the public interest or to exercise one of our functions or powers as a school. This basis applies to purposes 1, 2, 3 and 4 above. For example, when we teach and look after you.
- **Legal obligation:** The School might need to use your personal data to comply with a legal obligation. For example, to report a concern about your wellbeing to Children's Services. Occasionally we may have a legal obligation to share your personal data with third parties such as the court.
- **Vital interests:** Although this won't happen very often, we may need to use your personal data to protect you or someone else. For example, to prevent someone from being seriously harmed or killed.

- **Recognised legitimate interest**: a new piece of legislation, called the Data Use abd Access Act (2025, allows schools to use this lawful basis to share your data in emergencies, for safeguarding reasons and for security and prevention of crime, such as CCTV recording.

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

6. Our purposes and lawful bases in more detail

6.1 This section gives you more information about why the School uses your personal data. Also where we get it from, who it is shared with, and which lawful bases apply. It does not say anything different to the sections above but goes into more detail.

6.2 We have used a colour coded system so that you can see which lawful bases we are relying on for each of the purposes described at paragraphs 1 to 60 below.

6.3 The letters highlighted in different colours below refer to the lawful bases. So LI means legitimate interests, PI means public task, LO means lawful obligation and VI means vital interests. So (LI, PI) means that 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 you and other pupils with an education (LI, PI).

2. The School will also use your personal data to safeguard and promote your welfare and the welfare of others (for example, so that we can look after you if you are hurt) (LI, PI, VI).

3. We use information about you during the admissions process e.g. when ensuring that any reasonable adjustments/suitable arrangements are made for you when you visit, marking your entrance test and learning more about you from your parents before you join the School] (LI, PI).

4. We may let your old school know if you have been offered a place at the School. This is because they have a legitimate interest in finding out what happens to their former pupils as this will help them support their other pupils when they leave the school (LI).

5. The admissions forms which your parents complete give us lots of personal data about you, such as, your name, contact details, disabilities, any particular difficulties you have with work, hobbies and interests, medical information (such as information about an allergy) and your family circumstances (LI, PI).

6. We get information from you, your parents, your teachers and other pupils. Your old school(s) also give us information about how well you did and any difficulties you had so that we can teach and take care of you (LI, PI).

7. Sometimes we get information from your doctors and other professionals where we need this to look after you (LI, PI).

8. We need to tell the appropriate teachers if you have a health issue and use your medical information to look after you (LI, PI).

9. We will need to tell your teachers if you have special educational needs or need extra help with some tasks (LI, PI).

10. We will need to share information about you (e.g. about your health and wellbeing) with the School Nurse or counsellor. (LI, PI, VI).

11. If we have information that you suffer from an allergy we will use this information so that we can look after you (LI, PI, VI).

12. If we have information that you have a disability we will use information about that disability to provide support for you, adjust our policies and take it into account when we make decisions (LI, PI).

13. Where appropriate, the School will have information about your religious beliefs or other beliefs and practices. For example, if you do not eat certain foods (LI, PI).]

14. We will also hold information such as your religion or ethnic group for the purposes of tracking sanctions to ensure there's no accidental bias going on when sanctions are given out.

15. We may share information about you with (and get information from) hospitals and people such as doctors and nurses, for example, in relation to pupil immunisations. (LI, PI).

16. We use CCTV to make sure the School site is safe. We may also use CCTV in relation to complaints and any incidents which take place on our sites (e.g. where pupils have been misbehaving or someone has been injured). Images captured of you via CCTV will be your personal data. CCTV is not used in private areas such as changing rooms (LI, PI). For more information about our use of CCTV please see our CCTV Policy, which can be requested from the Data Protection Lead by emailing dataprotection@daneshillschool.co.uk.

17. We will use your personal data to make sure the school site and buildings are safe, for example, we keep a record of who is on the school sites at any given time. (LI, PI).

18. We record your attendance and if you have time away from the School we record the reason(s) why (LI, PI).

19. We will need to share some information about you with the government (e.g. the Department for Education). We will also need to share your personal data with the local authority, for example, to tell them that you attend the School, if you leave the School or let them know if we have any concerns about your welfare. The local authority may also share information with us for these reasons (LI, LO, PI).

20. We may need to share information about you with the Health and Safety Executive (a government organisation) if there is a health and safety issue at the School (LI, LO).

21. The School is a charity which means that we may need to share your personal data with the Charity Commission which checks how we are behaving as a charity. We may also share your personal data with the Fundraising Regulator if this is relevant to their work (LI, PI, LO).]

22. The School is sometimes inspected to make sure that we are continuing to be a good school. We will have to make your personal data available to the inspectors to help them to carry out their job (LI, PI, LO).

23. We will need information about any court proceedings, court orders or criminal matters that relate to you. For example, if one of your parents has to collect you from school on certain days. This is so that we can safeguard your welfare and wellbeing and the other pupils at the School (LI, PI).

24. If you are from another country we have to make sure that you have the right to study in the UK. Sometimes the government will ask us to provide information as part of our

reporting requirements. In addition to this we have a duty to provide information about you to UK Visas and Immigration who are part of the government (LI, LO, PI).]

25. Depending on where you will go when you leave us we will provide your personal data to other schools. For example, we will share information about your exam results and provide references. Any references that we provide or receive will be treated as confidential which means that you will not usually be provided with a copy (LI, PI).

26. If we hold safeguarding or child protection information about you, we will share that with your next school (LI, PI, LO).

27. We may pass on information to your next school which they need to look after you, for example, information about any concerns we have had about your welfare (LI, LO, PI).

1 When you take public examinations (e.g. Common Entrance) we will need to share information about you with examination boards. For example, if you require extra time in your exams (LI, PI). We may share your public exam results with your parents (LO, PI).

28. The Learning Records Service (which is part of the government) will give us your unique learning number. We may receive details about you (e.g. your qualifications) from the Learning Records Service (LI, PI).]

29. We will provide your personal data to the local authority so that they can provide careers advice. We may also share your personal data with the provider of youth support services (LI, PI).]

30. If someone makes a complaint about how the School has behaved we may need to use your personal data to deal with this appropriately. For example, if your parents complain that we have not looked after you properly (LI, PI).

31. If one of your teachers hasn't done their job properly and this has affected you, we may need to use your personal data to investigate. We might also have to share your personal data with the government and regulators if they become involved, for example, if they need to decide if the teacher should be able to teach anymore (LI, PI, LO).

32. The School may share information about you with the local authority for the purpose of the preparation, implementation and / or review of your Education Health and Care Plan (LI, PI, LO).

33. We may use your personal data in connection with legal disputes (LI, PI, LO).

34. We may need to share information about you with the police (and with others who do a similar job to the police) and/or our legal advisers, if something goes wrong or to help with an enquiry. For example, if one of your classmates is injured at School or if there is a burglary (LI, LO, PI).

35. We use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We will share your personal data with them if this is relevant to their work (LI, PI).

36. If you have misbehaved in a serious way, we may need to share your personal data with the police (and/or other law enforcement agencies) and we may need to use information about the action taken by them (LI, LO, PI).

37. 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).

38. If the School is dealing with a request for information, query, or complaint, we may need to share your personal data with the other people involved, such as, other pupils and their parents (LI, PI).

39. Parents who are based outside of the UK will sometimes choose someone to act on their behalf during the admissions process (an overseas agent). If this applies to you, your parents may provide information to the overseas agent so that he or she can pass this on to the School. The School will sometimes share information with the overseas agent, for example, we may send them the letter telling your parents that we are offering you a place so that they can pass this on to your parents (LI)

40. We will share information about your academics (e.g. progress in lessons) and (where fair) information about your behaviour with your parents or guardian so they can support your schooling (LI, PI).

41. If you have behaved badly in relation to one of your classmates (e.g. we suspect bullying) then we might share information with that pupil's parents (e.g. what sanction you have been given) (LI, PI).

42. If ever in the future, we are considering restructuring the charity which operates the School, we may share your personal data with the other parties involved and with the relevant professional advisors (LI).

2 We will use web filtering and keyword detection solutions on any school owned electronic devices In certain circumstances we will look at the content of your messages (e.g. emails and text messages) and your electronic devices. We monitor and look at your use of technology (e.g. your use of your 1 to 1 device) to check that you and your classmates are not misbehaving or at risk of harm, or for other good reasons. If you would like more information about this, you can read the Pupil ICT and AI Acceptable Use Agreement or speak to your form teacher. The monitoring we do is carried out using computer software which will automatically tell us if something isn't right. If this is the case, the software will alert the relevant person (e.g. form teacher, DSL, Deputy Head Pastoral and Head) of the word or sentence that was used and why this may be worrying, so they can stop you from e.g. hurting yourself or others. (LI, PI).

43. **Photos and Videos**

- You might have seen that the School regularly publishes photos and images (including videos) of our pupils. If we obtain a photo or image (including a video) of you, we might put this on our website, on our social media pages or in our promotional material, e.g. our prospectus. We do this to show prospective pupils what we do here and to advertise the School (LI).

- We may continue to use these photos and videos after you have left the School (LI).

- If we would like to use a photo or video in a more unusual or high profile way (e.g. on a banner or billboard) we will speak to you about this first.

- Sometimes we use photos and videos for teaching purposes, for example, to record a drama lesson (LI, PI).

- If you have concerns about us using photos or videos of you please speak to your form teacher.

- We may use your personal data to help make the School better. For example, after you have left the School we might send you information about how you can donate to the bursary fund (LI). For more information, please see our Fundraising and Development Privacy Notice (available from the Finance Department).

- We publish our public exam results, sports fixtures and other news on the website and put articles and photos in the local news to tell people about what we have been doing (LI).

- We will keep your contact details when you leave so we can keep you updated about what is happening at the School, to tell you about events and activities and find out how you are getting on. We may also pass your details onto the alumni organisation which is called Old Danes. Further information on the alumni association can be received from the Data Protection Lead (LI).

- We must make sure that our computer systems are working well and are secure. This may involve information about you, for example, our anti-virus software might scan files containing information about you (LI).

- Sometimes we hire someone from outside of the School to provide activities. For example, this could be a teacher who does not normally work for the School or it could be a company that provides outdoor activities. We may share your personal data with them, for example, to tell them what sports you are good at (LI, PI).]

- Some of the records the School keeps and which contain your personal data may be used by the School (or by someone else such as the government) to check that the School has been a good school (LI, PI).

- We also keep some information forever for archiving purposes and for historical research purposes. This includes the School's legitimate interest in keeping a record of what the School was like in the past.

- For example, we keep some old photos so that we have a record of what the School was like in the past as this helps get people interested in the School's history.

- Information held in our archive may be made publicly available but this would only be done in compliance with data protection laws. Please speak to your form teacher if you would like more information (LI, PI).

44. We will share your personal data with the governors of the School if it concerns something they should know about or the information will enable them to fulfil their role as a governor. For example, this will apply if you have done something really well or if there is a problem at the School they need to know about (LI, PI).

45. We will only share your personal data with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would normally. Anyone that we share information with may give us information about you as well.

46. As you will see from the information above, in some cases we will rely on more than one lawful basis for using your personal data.

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

    a) IT consultants (including data managers) who help run the School's computer systems. For example, they might need to access a file containing personal data when investigating a fault or checking the security of our IT network, or fix a fault with your student record;

    b) caterers may have information about any food allergies or intolerances that you have;

c) we use software, apps and websites to help us with teaching, and to help us provide pastoral support to you and your classmates. For example, we use an app which allows you to access homework which has been set by your teachers; and

d) we use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the School site.

If you have any questions about any of the above, please speak to your form teacher.

7. Consent

7.1 We may sometimes ask for your consent to use your personal data. For example, we may ask for your consent to send you information about a fundraising event by email.

If we ask for your consent to use your personal data you can take back this consent at any time. But any use of your personal data before you withdraw your consent remains valid. Please speak to your form teacher if you would like to withdraw any consent that you have given.

8. Sending information to other countries

8.1 When the School sends personal data outside of the UK, we have to consider whether your personal data will be kept safe. Some countries are considered by the UK Government to have adequate rules and this includes all of the European Union and some other countries, such as, New Zealand, Norway, Switzerland and Argentina.

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

- go on a trip to France and share your personal data with activity providers and the hotel; and
- store your personal data in cloud computer storage with servers in Ireland.

8.3 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. For example, we may:

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

8.4 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.

8.5 If you have any questions about the safeguards that are in place please contact the Data Protection Lead.

9. For how long do we keep your personal data?

9.1 We keep your personal data for as long as we need to in order to educate and look after you. We will keep a lot of information after you have left the School, for example, so that we can find out what happened if you make a complaint.

9.2 In some cases we may keep your personal data for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

9.3 Please see our Information and Information and Records Retention Policy for more detailed information. This can be received from the IT department or via reception.

10. What decisions can you make about your personal data?

- **Correction**: if personal data the School holds about you is incorrect or incomplete you can ask us to correct it.
- **Access:** you can also ask what personal data we hold about you and to be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and who we have sent it to.
- **Deletion:** you can ask us to delete the personal data that we hold about you in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your personal data to you or to a third party in a format that can be read by computer in certain circumstances.
- **Restriction:** you can request that we restrict how we use your personal data in certain circumstances. Please contact your form teacher if you would like to know more.
- **Object:** you may object to us using your personal data where:
  - we are using it for direct marketing purposes (e.g. to send you an email about a fundraising opportunity]);
  - the lawful basis on which we are relying is either legitimate interests or public task. Please see the section "Our lawful bases for using your personal data" above;
  - if we ever use your personal data for scientific or historical research purposes or statistical purposes.

  When you exercise your right to access your personal data we hold about you, we will, in accordance with the Data (Use and Access) Act 2025:

  - Carry out searches that are reasonable and proportionate to your request
  - Ask for clarification where a request is unclear, and we may 'stop the clock' until the clarification is received.
  - Charge a reasonable fee
  - Refuse a request that is manifestly unfounded or excessive
  -

10.1 Your form teacher can give you more information about your data protection rights. Please note that these rights don't apply in all cases and we won't always have to comply with your request. For example, if we keep a record because we are worried about you then we will usually need to keep this for a while even if you object.

11. Further information and guidance

11.1 Your form teacher can answer any questions which you might have.

11.2 Like other organisations we need to keep your personal data 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 get fairly.

11.3 Please speak to your form teacher or another member of staff if:

- you would like to exercise any of your rights listed above; or
- you would like us to update the information we hold about you; or

- you have any concerns about how your personal data is used or shared.

11.4 The Data Protection Lead (DPL is in charge of the School's data protection compliance. You can ask your form teacher to speak to the Data Protection Lead or speak to them yourself. Alternatively, you can ask your parents to speak to us on your behalf if you prefer.

11.5 If we ask you to tell us something and you do not do so, then this may make it more difficult for us to teach and look after you and others.

11.6 We do not use solely automatic decision making in any of the processes that can affect parents or pupils.

11.7 The school maintains appropriate organisational and technical measures to ensure compliance with UK GDPR and the Data (Use and Access) Act 2025.

11.8

11.9 You have a right to make a data protection complaint as per the DUAA 2025 legislation. The process is detailed under Appendix 1 of the Data Protection Policy, which includes guidance on complaining to the School and to the Information Commissioner's Office (ico.org.uk). The ICO is the data protection regulator which means that they enforce the rules that we must obey.

11.10 If you have any concerns about how we have handled your personal data, we would kindly ask that you tell us first before you speak to the ICO so that we have an opportunity to put things right.

Privacy Notice for Parents of Younger Pupils

1. Key Information

1.1 We would like to let you know how and why we collect information about your child and what we do with it. Information about your child is called "personal data".

1.2 When we refer to 'the School' or 'we' this means The Vernon Educational Trust Limited, trading as Danes Hill School.

1.3 The School uses all sorts of personal data. For example, we use information about how well your child is doing at School. We also use any information we need to take care of your child. Photos and images (including video recording) of your child also count as their personal data.

1.4 The School uses your child's personal data to:

- Teach your child and our other pupils;
- To monitor and report on your child's academic progress and attainment
- Monitor the behaviour of your child and others and to take action where appropriate;
- Look after your child and other people e.g. their friends;
- Enable the School to comply with its legal obligations, to assist in the management and operation of the School and to advance and protect the School's interests, objects and reputation; and
- Fundraise, market and promote the School. For example, by using photos of our pupils in the School prospectus, on the School's website or on social media.

1.5 Here are some examples of how we use your child's personal data and where that personal data comes from.

- Admissions forms give us lots of personal data about your child. We get information from you, your child's teachers and other pupils. Your child's old school also gives us information or a reference about your child so that we can teach and care for your child. Such references may be requested and received on a confidential basis for the purpose of assessing your prospective education. Where a reference is provided to us in confidence, we will treat it as a confidential reference and may apply the relevant lawful exemption from the right of access under data protection legislation. Any subject access request will be considered on its individual circumstances, including whether the information constitutes a confidential reference and whether any other exemptions apply.
- Sometimes we get information from your child's doctors and other professionals where we need this to look after your child.
- We may need to share some of your child's personal data with the government (e.g. the Department for Education). We will need to tell the local authority that your child attends the School, if your child leaves the School or if we have any concerns about your child's welfare.
- We may use photos or images (including video recordings) of your child to show prospective pupils what we do here and to advertise the School. We may continue to use these photos and videos after your child has left the School. Sometimes we use photos and videos for teaching purposes, for example, to record a drama lesson.

- We publish our public exam results, sports fixtures and other news on the website. We also put articles and photos in the local news to tell people about what we have been doing.

- We use CCTV to make sure the School site is safe and sometimes to investigate incidents (e.g. where pupils have been misbehaving or someone has been injured). CCTV is not used in private areas such as changing rooms or toilets. For more information about our use of CCTV please contact the Head of Compliance via the School Reception.

- We will keep details of your child's address when they leave so we can keep them updated about what is happening at the School, to tell them about events and activities and find out how they are getting on. We may also pass their details onto the alumni organisation which is called Old Danes. Further information on the alumni association can be provided via reception or by speaking to the Data Protection Lead.

1.6 You can exercise the following rights regarding your child's personal data:

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

1.7 These rights are explained in more detail in the full privacy notice, and your child's form teacher can give you more information. These rights don't apply in all cases.

1.8 If you would like to know more, you can find the full version of our pupil privacy notice on the School's website. It can be found on the school website under “Policies”. You can also get a copy of the full privacy notice by contacting the School via reception or by speaking to your child's form teacher.

1.9 The full version includes additional points, such as:

- more information on why we use your child's personal data;
- for how long the School keeps your child's personal data; and
- our lawful bases for using your child's personal data.

1.10 The Data Protection Lead (DPL) 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 child's personal data.

2. Introduction

2.1 This notice is to help you understand **how** and **why** The Vernon Educational Trust Limited, trading as Danes Hill School, ('**the School**' or '**we**') collects personal data about your child and **what** we do with that information. It also explains the decisions that you can make about your child's personal data.

2.2 We are giving you this notice because you are able to exercise your child's data protection rights on their behalf. When your child is older (usually when they reach the age of 12) they will usually be considered to have enough understanding to exercise their own data protection rights.

2.3 If you have any questions about this notice please talk to the Data Protection Lead.

3. What is "personal data"?

3.1 Personal data is information that the School holds about your child and which identifies your child (either directly or indirectly).

3.2 This includes information such as their date of birth and address as well as things like exam results, medical details and behaviour records. CCTV images, photos and video recordings of your child are also personal data.

4. Where we get your child's personal data from and who we share it with

4.1 Your child's personal data comes from a number of different sources. For example, the School's admissions forms, our teachers, you, your child's previous schools and any future school, other pupils and their parents. We might also get information from the government e.g. the local authority might give us information that we need to look after your child.

4.2 We will also share information with these people and organisations.

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

5. The purposes for which we use your child's personal data and the lawful bases

5.1 The School uses your child's personal data to:

- Teach your child and our other pupils;
- To monitor and report on your academic progress and attainment
- Monitor the behaviour of your child and others and to take action where appropriate;
- Look after your child and other people e.g. your child's friends;
- Enable the School to comply with its legal obligations, to assist in the management and operation of the School and to advance and protect the School's interests, objects and reputation; and
- Fundraise, market and promote the School. For example, by using photos of our pupils in the School prospectus, on the School's website or on social media.

5.2 Under data protection law, the School can only use personal data if it has a lawful basis for doing so. The lawful bases that we are relying on when handling your child's personal data are as follows:

- **Legitimate interests:** This means that the School is using your child's 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 agreement with you for your child to be at the School;
        - investigating if something has gone wrong;
        - protecting, promoting and improving the School
    - This lawful basis only applies where our legitimate interests are not overridden by your child's interests, rights and freedoms. Legitimate interests applies to all of the 5 purposes listed above.

- **Public task:** This allows the School to use personal data where doing so is necessary in order to perform a task in the public interest or to exercise one of our functions or powers as a school. This basis applies to purposes 1, 2, 3 and 4 above. For example, when we teach and look after your child.

- **Legal obligation:** The School might need to use your child's personal data in order to comply with a legal obligation. For example, to report a safeguarding concern to Children's Services. Occasionally the School may have a legal obligation to share your child's personal data with third parties such as the court.

- **Vital interests:** In limited circumstances we may use your child's personal data to protect your child's vital interests or the vital interests of someone else. For example, to prevent someone from being seriously harmed or killed

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

6. Our purposes and lawful bases in more detail

6.1 This section contains more detail about the purposes for which your child's personal data is used, the applicable lawful basis or bases as well as further information about sources and recipients. It does not say anything different to what's set out above but goes into more detail.

6.2 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 57 below. LI means legitimate interests, PI means public task, LO means legal obligation and VI means vital interests. So (LI, PI) means that we are relying on both legitimate interests and public task for that purpose. Please see a list of the lawful bases, below:

1. Our main reason for using your child's information is to provide your child and other pupils with an education (LI, PI).

2. The School will also use your child's personal data to safeguard and promote your child's welfare and the welfare of others (for example, so that we can look after your child if they are hurt) (LI, PI, VI).

3. We will use information about your child during the admissions process e.g. when marking entrance tests and considering any information provided on the registration and confidential information form (LI, PI).

4. We may let your child's previous school know if they have been offered a place at the School. This is because they have a legitimate interest in finding out what happens to their former pupils as this will help them support their other pupils when they leave the school (LI).

5. The admissions forms which you complete give us personal data about your child, such as, their name, contact details, disabilities, learning disabilities, any particular difficulties they have with work, hobbies and interests, medical information (such as information about an allergy) and their family circumstances (LI, PI).

6. We get information from your child, his / her teachers and other pupils. Your child's old school also gives us information about how well your child did and any difficulties they had if we need this information to teach and take care of them (LI, PI).

7. Sometimes we get information from your child's doctor and other professionals where we need this to look after your child (LI, PI).

8. We need to tell all appropriate members of staff if your child has a health issue and use their medical information to look after them (LI, PI).

9. We will tell your child's teachers if he or she has special educational needs or requires extra help with some tasks (LI, PI).

10. We will need to share information about your child (e.g. about their health and wellbeing) with the School Medical Officer or counsellor] (LI, PI, VI).

11. If we have information that your child suffers from an allergy we will use this information so that we can look after your child (LI, PI, VI).

12. If we have information that your child has a disability we will use information about that disability to provide support for your child, adjust our policies and take it into account when we make decisions (LI, PI).

13. Where appropriate, the School will have information about your child's religious beliefs or other beliefs and practices. For example, if your child does not eat certain foods (LI, PI).]

14. We will also hold information such as your child's religion or ethnic group for the purposes of analysing sanctions to ensure e.g. there is no unconscious bias at play.

15. We use CCTV to make sure the School site is safe. Images captured of your child via CCTV will be your child's personal data. CCTV is not used in private areas such as changing rooms (LI, PI).

16. We will use your child's personal data to take other steps to make sure the school site and buildings are safe, for example, we keep a record of who is on the school sites at any given time] (LI, PI).

17. We may share information about your child with (and get information from) health authorities, providers of healthcare services and healthcare professionals, for example, in relation to pupil immunisations. (LI, PI).

18. We record your child's attendance and if he or she has time away from the School we record the reason(s) why (LI, PI).

19. We will need to share some of your child's information with regulators and with the government (e.g. the Department for Education). We will need to tell the local authority that your child attends the School, if your child leaves the School or let them know if we have any concerns about your child's welfare. The local authority may also share information with us for these reasons (LI, LO, PI).

20. We may need to share information about your child with the Health and Safety Executive (a government organisation) if there is a health and safety issue at the School (LI, LO).

21. The School is a charity which means that in exceptional circumstances we may need to share your child's personal data with the Charity Commission e.g. in the event of a serious incident (LI, LO, PI).

22. 22 When we are inspected by the Independent Schools Inspectorate we will have to make your child's personal data available to the inspectors to assist them with their inspection (LI, LO, PI).

23. If the School receives a complaint or grievance that involves your child we will need to use their personal data to deal with this appropriately. For example, if you make a complaint or if another parent complains about an issue which involves your child (LI, PI).

24. The School may share information about your child with the local authority for the purpose of the preparation, implementation and / or review of your child's Statement of Special Educational Needs or Education Health and Care Plan (LI, PI, LO).

25. We may use your child's personal data in connection with legal disputes (LI, PI, LO).

3 We are legally required to provide the Department for Education with certain information about your child. Some of this information will be stored on the National Pupil Database. Organisations can request information from the National Pupil Database which includes information about your child. But they are only allowed to do this for limited purposes, and they must be very careful about how they use your child's personal data. More information can be found here - https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information (LO).

26. We will need information about any court proceedings, court orders or criminal petitions that relate to your child. This is so that we can safeguard your child's welfare and wellbeing as well as other pupils at the School (LI, PI).

4 If your child is from another country we have to make sure that they have the right to study in the UK. Sometimes the government will ask us to provide information as part of our reporting requirements. In addition to this we have a duty to provide information about your child to UK Visas and Immigration who are part of the government (LI, LO, PI).]

27. Depending on where your child will go when they leave us we will provide their information to other schools. For example, we will share information about your child's exam results and provide references. Any references that we provide will be confidential which means that you might not be provided with a copy (LI, P1).

28. If we hold safeguarding or child protection information about your child, we will share that with your child's next school (LI, PI, LO).

29. If your child has a safeguarding file, we are legally required to pass this file to their next school (LI, LO, PI).

30. If your child takes public examinations we will need to share information about them with examination boards. For example, if your child requires extra time in exams (LI, PI).

31. We may need to share information with the police (and/or other law enforcement agencies) and/or our legal advisers if something goes wrong or to help with an inquiry. For example, if one of your child's classmates is injured at School or if there is a burglary (LI, LO, PI).

32. We use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We will share your child's information with them if this is relevant to their work (LI, PI).

33. If your child has misbehaved in a serious way, we may need to share information with the police (and/or other law enforcement agencies) and we may need to use information about the action taken by the police (LI, LO, PI).]

34. 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).

35. If the School is dealing with a request for information, query, complaint or grievance (e.g. from a parent), we may need to share your child's information with other parties if it is relevant and appropriate to do so. For example, with the appropriate staff, pupil or parent involved and governors (LI, PI)

36. If one of your child's teachers is subject to an internal disciplinary case and this has affected your child, we may need to use your personal child's personal data to investigate. We may also need to share your child's personal data with the government and regulators if they become involved, for example, if they need to make a decision regarding the teacher's ability to teach (LI, PI, LO).

37. If you are based outside of the UK and have appointed an agent to act on your behalf during the admissions process (an overseas agent), then we may share information about your child with them. For example, we may send them the acceptance letter so that they can pass this on to you (LI).

38. We will share your child's academic and (where fair) their behaviour records with you [• or their education guardian] so you can support your child's schooling (LI, PI). If your child has behaved badly in relation to one of their classmates (e.g. we suspect bullying) then we might share information with that pupil's parents (e.g. what sanction your child has been given) (LI, PI).

39. If ever in the future, we are considering restructuring the charity which operates the School, we may share your child's personal data with the other parties involved and with the relevant professional advisors (LI).

40. We will monitor your child's use of email, the internet and any internet based platforms, as well as mobile electronic devices e.g. iPads.

41. In certain circumstances we will look at the content of your child's communications (e.g. emails and MS Teams messages) and their electronic devices. This is to check that your child is not misbehaving when using this technology or putting themselves at risk of harm.

If you would like more information about this you can read the Pupil ICT and AI Acceptable Use Agreement available from the IT department, or speak to your child's form teacher. The monitoring we do is carried out using computer software which will automatically tell us if something isn't right. If this is the case, an alert will be sent to e.g. the form teacher, Deputy Head pastoral and Head, who will get a screen shot of the message and ensures they can help your child from harming themselves or others. This includes key strokes that later may be deleted. (LI, PI).]

5 Photos and Videos

6 The School regularly publishes photos and images (including video recordings) of our pupils. If we take a photo or video of your child, we might put this on our website, on our social media page(s) or in our prospectus. We do this to show prospective pupils and parents what we do here and to advertise the School (LI).

7 We will continue to use these photos and videos after your child has left the School (LI, PI).

8 If we would like to use a photo or video in a more unusual or high profile way (e.g. on a banner or billboard) we will talk to you about this first.

9 Sometimes we use photos and videos for teaching purposes, for example, to record a drama lesson (LI, PI).

10 If you have any concerns about us using photos or videos of your child please speak to your child's form teacher.

11 We publish our public exam results, sports fixtures and other news on the website and put articles and photos in the local news to tell people about what we have been doing (LI).

12 We will keep your child's contact details when they leave so we can keep them updated about what is happening at the School, to tell them about events and activities and find out how they are getting on. We may also pass their details onto the alumni organisation which is called Old Danes. Further information on the alumni association can be provided by reception or Mrs Callis (LI). For more information about how we use your child's personal data after you have left the School you can read the Fundraising and Development Privacy Notice.

13 The School must make sure that its computer systems are working well and are secure. This may involve information about your child, for example, our anti-virus software might scan files containing information about your child (LI).

14 From time to time, we hire a third party to provide activities such as an external sports coach. We may share your child's personal data with them, for example, to tell them what sports they are good at (LI, PI)].

15 Some of the records the School keeps and which contain your child's personal data may be used by the School (or by someone else such as the government) to check that the School has been a good school (LI, PI).

16 We also keep some information indefinitely for archiving purposes (this is known as "archiving in the public interest" under data protection law) and for historical research purposes.

- This includes the School's legitimate interest in research; supporting long-term accountability; enabling the discovery and availability of the School's and the wider school community's identity, memory, culture and history; enabling the establishment and maintenance of rights and obligations and of precedent decisions; educational purposes; and commercial and non-commercial re-use.

- For example, we keep some old photos so that we have a record of what the School was like in the past.

- Information held in our archive may be made publicly available but this would only be done in compliance with data protection laws (LI, PI).

- We will share your child's personal data with the governors of the School if it concerns something they should know about or which will enable them to fulfil their role as a governor. For example, this will apply if your child has done something really well or if there is a problem at the School they need to know about (LI, PI).

- We will only share your child's personal data with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would normally. Anyone that we share information with may give us information about your child as well.

6.3 As you will see from the information above, in some cases we will rely on more than one lawful basis for using your child's personal data.

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

a) IT consultants, including Data Manager who might access information about you when checking the security of our IT network, or fix a problem with your child's record;

b) caterers may have information about any food allergies or intolerances that your child has;

c) we use software, apps and websites to help us with teaching, and to help us provide pastoral support to our pupils. For example, we use an app which allows pupils to access homework which has been set by their teachers]; and

d) we use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the School site].

If you have any questions about any of the above, please speak to your child's form teacher.

7. Consent

7.1 We may ask for your consent to use your child's personal data in certain ways as an alternative to any of the lawful bases above (e.g. LI or PI). For example, we may ask for your consent to send you information about a fundraising event by email.

7.2 If we ask for your consent to use your personal data you can take back this consent at any time. But any use of your personal data before you withdraw your consent remains valid. Please speak to your child's form teacher if you would like to withdraw any consent that you have given.

8. Sending information to other countries

8.1 When the School sends personal data outside of the UK, we have to consider if the other country has the same level of protection for personal data as there is in the UK. Some countries are considered by the UK Government to have adequate rules and this includes all of the European Union and some other countries, such as, New Zealand, Norway, Switzerland and Argentina.

8.2 The School sends your child's personal data to countries with adequate rules when we:

- go on a trip to France and share your child's personal data with activity providers and the hotel; and
- store your child's personal data in cloud computer storage with servers in Ireland.

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

- store your child's personal data in cloud computer storage with servers in the USA;

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

If you have any questions about the safeguards that are in place please contact the Data Protection Lead.

9. For how long do we keep your child's information?

9.1 We keep your child's personal data for as long as we need to in order to educate and look after them. We will keep a lot of information after your child has left the School, for example, so that we can find out what happened if you make a complaint.

9.2 In some cases we may keep your child's personal data for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

9.3 Please see our Data Retention Policy for more detailed information. This can be provided by the IT Department.

10. What decisions can you make about your child's personal data?

- **Correction**: if personal data held by the School about your child is incorrect or incomplete you can ask us to correct it.
- **Access:** you can also ask what personal data we hold about your child and to be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this personal data about your child, where it came from and who we have sent it to.
- When you exercise your right to access your child's personal data we hold, we will, in accordance with the Data (use and access) Act 2025::
- Carry out searches that are reasonable and proportionate to your request
- Ask for clarification where a request is unclear, and we may 'stop the clock' until the clarification is received.
- Charge a reasonable fee
- Refuse a request that is manifestly unfounded or excessive
-
- **Deletion:** you can ask us to delete the personal data that we hold about your child in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your child's personal data to you or to a third party in a format that can be read by computer in certain circumstances.
- **Restriction:** you can request that we restrict how we use your child's personal data in certain circumstances. Please contact your child's form teacher if you would like to know more.
- **Object:** you may object to us using your child's personal data where:
  - we are using it for direct marketing purposes (e.g. to send you an email about a fundraising opportunity]);
  - the lawful basis on which we are relying is either legitimate interests or public task . Please see the section "The purposes for which we use your child's personal data and the lawful bases" above;
  - If we ever use your child's personal data for scientific or historical research purposes or statistical purposes.

The Data Protection Lead can give you more information about your child's data protection rights. Please note that these rights don't apply in all cases and we won't always have to comply with your request.

11. Further information and guidance

11.1 The Data Protection Lead can answer any questions which you might have.

11.2 Like other organisations we need to keep your child's personal data 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 personal data we get fairly.

11.3 Please speak to the Data Protection Lead if:

- you would like to exercise any of your child's rights listed above; or
- you would like us to update the information we hold about your child; or
- you have any concerns about how your child's personal data is used or shared.

11.4 If you or your child fails to provide certain information when requested, we may not be able to perform our obligations under the contract we have entered into with you. We may also be prevented from complying with our legal obligations (such as to ensure the welfare of your child and their classmates). Failing to provide information may also adversely affect the education and care we are able to provide to your child.

11.5 We do not use solely automatic decision making in any of the processes that can affect parents or pupils.

11.6 The school maintains appropriate organisational and technical measures to ensure compliance with UK GDPR and the Data (Use and Access) Act 2025.

11.7 You have a right to make a data protection complaint as per the DUAA 2025 legislation. The process is detailed under Appendix 1 of the Data Protection Policy, which includes guidance on complaining to the School and to the Information Commissioner's Office (ico.org.uk). If you do have any concerns about how we have handled your child's personal data we would kindly ask that you contact us in the first instance before you speak to the ICO so that we have an opportunity to put things right.