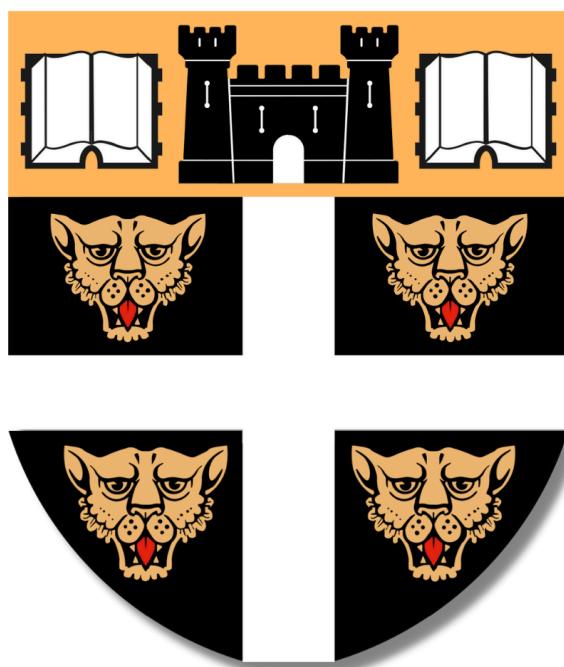


Privacy Notice (Whole School)

Dover College



Owner:	IT Manager	Date: August 2025
Approved By:	CS-M	Date: August 2025
Review Frequency	24 Months	
Last reviewed on:	August 2025	
Next review due by:	September 2027	

1. Introduction

Dover College respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we collect, use and safeguard personal data relating to our staff (current, former and prospective), pupils (current, former and prospective), and their parents or carers/legal guardians in addition to volunteers, self employed employees, independent contractors, consultants and other outsourced and non-permanent workers. This policy is intended to provide information about how the school will use (or "process") personal data about individuals including: its staff; its current, past and prospective pupils; and their parents, carers or guardians (referred to in this policy as "parents").

This Notice is intended to provide clarity on the types of data we process, our lawful basis for processing, who we may share it with, and your rights under data protection legislation. It applies in conjunction with other relevant policies and documents, including but not limited to:

- 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 CCTV policy contained within the Security policy;
- The school's document retention policy;
- The school's safeguarding, pastoral and health and safety policies, including as to how concerns or incidents are recorded;
- The school's IT policies, including its Acceptable Use of ICT, mobile phones and other electronic devices policy.

All individuals working with or on behalf of Dover College must adhere to this Privacy Notice and the school's Data Protection Policy.

2. Responsibility for your data protection

Dover College is the Data Controller for the purposes of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The College has appointed a Privacy Officer to oversee compliance with data protection obligations.

For queries or to exercise your rights under this Notice, you may contact:

Privacy Officer
Dover College
Effingham Crescent, Dover, Kent CT17 9RH
Email: privacy@dovercollege.org.uk

3. Why the school the needs to process personal data

In order to carry out its ordinary duties to staff, pupils and parents, the school needs to process a wide range of personal data about individuals as part of its daily operation to support its educational, pastoral and legal functions..

Other uses of personal data will be made in accordance with the school's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

The school expects that the following uses will fall within that category of its (or its community's) "legitimate interests":

- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents);
- To provide education services, including musical, LAMDA education, physical training or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with alumni and the school community, including direct marketing or fundraising activity;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- To enable relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the school;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's IT acceptable use policy;
- To make use of photographic images of pupils in school publications, on the school website and (where appropriate) on the school's social media channels in accordance with the school's policy on taking, storing and using images of children;
- For security purposes, including CCTV in accordance with the school's CCTV policy, contained within the Security Policy;
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and select and administer insurance and other relevant policies for the school.

In addition, the school will on occasion need to process special category personal data (concerning health, ethnicity, religion or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required.

These reasons will include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example, for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;
- To provide educational services in the context of any special educational needs of a pupil;
- In connection with employment of its staff, for example, DBS checks, welfare, union membership or pension plans;
- To run any of its systems that operate with data, such as for security and other forms of pupil identification (access systems);
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

The lawful bases for processing data include:

- Legal obligation
- Contractual necessity
- Legitimate interests
- Vital interests
- Consent (where applicable)

4. Types of personal data processed by the school

This will include by way of example:

- Basic identification: Names, addresses, dates of birth, contact details;
- Car details (about those who use our car parking facilities or require access to the site (eg ANPR));
- Financial details: Bank details and other financial information, for example fee payments, bank details; bursary applications;
- Academic, disciplinary, attendance and behavioural records: Past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks, and equivalent information for staff, volunteers and self employed;
- Employment and HR records, including safeguarding;
- Medical and pastoral care information: individuals' health and welfare, and contact details for their 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;
- Special category data (eg health, ethnicity, religious beliefs) and criminal convictions where relevant;
- CCTV footage, photographic images and recordings: including images of pupils (and occasionally other individuals) engaging in school activities, and images captured by the school's CCTV system and entry/access systems; and

- Safeguarding records.

5. How the school collects data

The school collects data from:

- Direct interactions (e.g. forms, emails, interviews, meetings)
- Parents, pupils, staff and third parties (e.g. previous schools, referees)
- Publicly available sources
- CCTV systems and IT monitoring tools
- Education and government bodies

6. Who has access to personal data and who the school shares it with

Occasionally, the school will need to share personal information relating to its community with third parties, such as:

- Professional advisers (e.g. lawyers, insurers, PR advisers, HR advisors, debt recovery agents, bursary assessors and accountants);
- Government agencies (e.g. HMRC, DfE, UKVI, police, local authorities);
- Appropriate regulatory bodies e.g. NCTL (<https://www.gov.uk/government/organisations/national-college-for-teaching-and-leadership>); the Independent Schools Inspectorate (<https://www.isi.net>), the Charity Commission (<https://www.gov.uk/government/organisations/charity-commission>), the Information Commissioner (<https://ico.org.uk>), Ofsted.
- IT service providers and cloud storage platforms;
- Medical professionals, school nurses, trip organisers (for welfare purposes).

For the most part, personal data collected by the school will remain within the school, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- Medical records held and accessed only by the Senior Nurse and appropriate medical staff under his/her supervision, or otherwise in accordance with express consent; and
- Pastoral or safeguarding files.

However, a certain amount of any SEN pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

Staff, pupils and parents are reminded that the school is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the Local Authority Designated Officer (LADO) or police. For further information about this, please view the school's Safeguarding Policy.

All external providers are subject to contractual obligations to ensure data is handled securely and only in accordance with our instructions.

7. How long will we keep personal data?

We retain personal data in accordance with our Data Retention Policy and legal obligations. Data is stored securely and retained only for as long as necessary for the purposes for which it was collected.

Retention periods vary depending on the nature of the information and applicable legal requirements. Safeguarding and certain employment records may be retained longer than others in accordance with specific legal requirements.

The School will implement all recommendations and requirements of the Independent Inquiry into Child Sexual Abuse in relation to the retention of records.

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").

Further information in relation to the retention of records and data can be found in the Data Retention Policy.

8. Keeping in touch and supporting the school.

With appropriate permissions and in line with data protection laws, we may use personal data to:

- Share news and updates about the College
- Promote events and fundraising initiatives
- Communicate with alumni and parents via Dover College Connect, The Old Dovorian Society and The Friends of Dover College

You may withdraw consent or object to such communications at any time by contacting the Privacy Officer.

YOUR RIGHTS

You have the following rights regarding your personal data:

- To access and obtain a copy of your data
- To request rectification of inaccurate data
- To request erasure (in certain circumstances)
- To restrict or object to processing
- To data portability (where applicable)
- To withdraw consent (where given)
- To lodge a complaint with the ICO

Requests must be submitted in writing to the Privacy Officer. We aim to respond within one month during term time, subject to verification and applicable exemptions.

The school will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the school may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

Requests that cannot be fulfilled

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 (for example legal advice given to or sought by the school, or documents prepared in connection with a legal action).

The school is also not required to disclose any pupil examination scripts (or other information consisting solely of pupil test answers), provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the school itself for the purposes of the education, training or employment of any individual.

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing you (or your child's) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

Pupil requests

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, subject to legal and safeguarding considerations.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, the law still considers the information in question to be the child's: for older pupils, the parent making the request may need to evidence their child's authority for the specific request.

Pupils aged 13 and above are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home.

Parental requests, etc.

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about pupils without their consent. The school may consider there are lawful grounds for sharing with or without reference to that pupil.

Parents will in general receive educational and pastoral updates about their children, in accordance with the Parent Contract. Where parents are separated, the school will in most cases aim to provide the same information to each person with parental responsibility, but may need to factor in all the circumstances including the express wishes of the child.

All information requests from, 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. The College may withhold certain data where required by law or in the best interests of the child.

Consent

Where the school is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Examples where we do rely on consent are: e.g. certain types of uses of images and certain types of fundraising activity. Please be aware however that the school may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because a purchase of goods, services or membership of an organisation such as an alumni or parents' association has been requested).

Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates. However, the school will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils, for example, under the parent contract, or via a form. Parents and pupils should be aware that this is not necessarily the same as the school relying on strict consent (see section on Consent above).

Where consent is required, it may in some cases be necessary or appropriate – given the nature of the processing in question, and the pupil's age and understanding – to seek the pupil's consent. 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 withdraws 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.

Pupils are required to respect the personal data and privacy of others, and to comply with the school's IT Acceptable Use Policy and the school rules. Staff are under professional duties to do the same covered under the relevant staff policy.

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 please notify the school office 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 or 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, and whom 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, training, secure storage and access to school systems and data handling protocols. All staff and governors will be made aware of this policy and their duties under Data Protection Law, and receive relevant training.

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.

QUERIES AND COMPLAINTS

For further information, or to raise a concern or complaint, please contact:

Privacy Officer
Dover College
Effingham Crescent, Dover, Kent CT17 9RH
Email: privacy@dovercollege.org.uk

You may also contact the Information Commissioner's Office (ICO) at www.ico.org.uk if you are not satisfied with our response, though we encourage you to contact us first to resolve any concerns.