



KEW COLLEGE PREP

Privacy Notice

This Privacy Notice is published on the Kew College Prep website and is also available to parents from the school office upon request.

Definitions or abbreviations used in this Privacy Notice

LADO: Local Authority Designated Officer

SEN: Special Educational Needs

The School: Kew College Prep

DSL: Designated Safeguarding Lead

1. WHO WE ARE

We are Kew College Prep, a company registered in England and Wales (the School). Our company registration number is 1678837 (registered as Kew College), our charity registration number is 286059, and our registered address is at:

24-26 Cumberland Road
Richmond
TW9 3HQ

2. WHAT THIS PRIVACY NOTICE IS FOR

This Privacy Notice is intended to provide information about how the school will collect, use and hold (or "process") personal data about individuals including: its current, past and prospective pupils; and their parents, carers or guardians (referred to in this policy as "parents").

This makes the School a data controller of your personal information and this information is provided because data protection law gives individuals rights to understand how their data is processed. 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. Please note that the School has a separate **Data Protection Policy** and **Privacy Notice for employees and other staff**.

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 **CCTV policy**;
- the School's retention of records policy;
- the School's safeguarding, pastoral and health & safety policies, including as to how concerns or incidents are recorded; and

- the School's IT policies, including *AI Policy, Social Media Policy, Online Safety Policy*

3. RESPONSIBILITY FOR DATA PROTECTION

- The school has appointed two Privacy Officers, one for systems and IT related matters, the other for operational matters.
- The Privacy Officers, together with the Bursar 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. (See below for contact details)
- You can contact the School using the details in section 13.

4. WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out our ordinary duties to staff, pupils and parents, the School needs to process a wide range of personal data about our community as part of our daily operation.

Some of this activity the School will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with parents of our pupils.

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 our (or our community's) "**legitimate interests**" (as recognised in law or determined by the School):

- For the purposes of pupil admission, and to confirm the identity of prospective pupils and their parents;
- To provide education services, including musical education, physical training or spiritual development, extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- To report to and liaise with parents about their child's progress, welfare and development including by way of regular reports and parents' evenings;
- To organise and manage meetings, events and social engagements for pupils and parents;
- 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 has attended or where it is proposed they will attend;

- 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 (including following the requirements and recommendations of the government's guidance on Keeping Children Safe In Education, KCSIE)
- To monitor (as appropriate) use of the School's IT and communications in accordance with the School's **Online Safety 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, CCTV is in operation in accordance with the School's **CCTV Policy**;
- For the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities;
- To carry out or cooperate with any School or external complaints, disciplinary or investigation process;
- To promote the School to prospective parents and pupils; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the School.

In addition, the School will on occasion need to process **special category personal data** (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on us 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 emergency medical care, to arrange the assessment and diagnosis of a pupil's health and medical conditions and special education needs, 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 comply with public health requirements;
- To provide educational services in the context of making reasonable adjustments for a pupil's disability and/or any special educational needs;
- To provide spiritual education in the context of any religious beliefs;
- As part of any School or external complaints, disciplinary or investigation process that involves such data, for example if there are SEND, 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.

5. TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- bank details and other financial information, e.g. about parents or others who pay fees to the School, and any source of funds and/or money laundering information we are required to collect by law;
- past, present and prospective pupils' academic, disciplinary, admissions, safeguarding and attendance records, and examination scripts and marks;
- where appropriate, information about pupil's health and medical conditions, special educational needs and family circumstances/living arrangements;
- 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 pupils and parents past and present; and
- images of pupils (and occasionally other individuals) engaging in School activities, including images captured by the School's CCTV system (in accordance with the school's *CCTV policy* and policy on *Taking, Storing and Using images of Pupils*);

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, through parents inputting data directly into Schoolbase, or in the ordinary course of interaction or communication (such as email or written assessments).

In some cases personal data will be supplied by third parties (for example another School, or other professionals or authorities working with that individual); or collected from publicly available resources.

7. WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH

Personal data collected by the School will for the most part be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis).

We use a number of trusted third-party service providers to support the delivery of our services, including Microsoft (for email, document storage, and collaboration tools), SchoolBase (for management information systems), and SchoolCloud (for communication and parents' evening booking services). These providers process personal data on our behalf under strict contractual arrangements and are required to implement appropriate technical

and organisational measures to ensure the security and confidentiality of personal data. Where these services involve the transfer or storage of data outside the UK, we ensure that appropriate safeguards are in place in accordance with UK data protection law. We only share the minimum personal data necessary to deliver these services and ensure that all processing is carried out in accordance with our data protection obligations.

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

- professional advisers (e.g. lawyers, insurers, -and accountants);
- examination boards;
- appropriate contractors, such as visiting music teachers;
- government authorities (e.g. HMRC, DfE, police, a public health/NHS body, or the local authority); and
- appropriate regulatory bodies (e.g. [NCTL](#), the [Independent Schools Inspectorate](#), Ofsted, the Charity Commission or the Information Commissioner);
- Stage 3 complaints panel which may include independent panel members (in accordance with *School Complaints Procedure*)

We may need to transfer personal data to countries outside of the United Kingdom. When we export personal data to a different country, we take steps to ensure that such data exports comply with applicable UK laws. For example, if we transfer personal data outside the European Economic Area (EEA), such as to the United States, we will implement an appropriate data export solution such as entering into contracts with the data importer that contain EU model clauses or taking other measures to provide an adequate level of data protection.

Other than those listed below, all our external providers store the employee data that we provide them in premises within the European Economic Area (EEA). This is subject to contractual assurances that personal data will be kept securely and only in accordance with the school's specific directions. For the external providers that have data hosted or processed in locations outside of the EEA, the School has reviewed the data stored, and considers that the risk of continuing to use each provider is acceptable.

Provider	Reason for Use	Data stored outside of the EEA
Book Creator for iPad	Teaching – e-book creation	USA – teacher log in data, pupil log in, pupil name.
Canva for Education	Photo and video editor	USA – pupil first name
CoSpaces Edu	3D creations and coding	Outside EEA – pupil log in, pupil name
Doodle Spell	Teaching - spelling	Outside EEA – first name and DOB
Seesaw	Teaching – classroom sharing	USA – teacher log in, pupil first names and photos

Access to, and sharing of, sensitive data

Particularly strict rules of access apply in the context of:

- Health and medical / special needs records; and
- pastoral or safeguarding files.

Medical / health data: the School needs to process medical / health information to comply with statutory duties and to keep pupils and others safe, but the School will ensure only authorised staff can access information on a need-to-know basis. This may include wider dissemination if needed for School trips or for catering purposes. A certain amount of any 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.

Safeguarding data: the School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education or “KCSIE”) 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, low-level concerns records kept about adults (which may include references to pupils or family members), and in some cases referrals to relevant authorities such as the LADO, Children’s Services, CAMHS or the police. Access to this is strictly regulated.

The school uses Net Support DNA safeguarding system for real-time monitoring of keywords and phrases to alert the School of any online activity that may have eSafety or safeguarding issues.

KCSIE also requires that, whenever a child leaves the School to join another school, their child protection file is promptly provided to the new organisation, along with any other information which the School’s DSL considers material to the ongoing care needs of the pupil. Where appropriate, the School will consult with parents as to how these needs are best served, but ultimately the decision as to what information is necessary to share with the new school is a safeguarding question that must be reserved to the School. The School will retain a copy of the child protection file in accordance with its retention policy for material related to safeguarding matters.

For further information about Safeguarding, please view the School’s ***Safeguarding and Child Protection Policy***.

8. 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 parent and pupil files is up to 7 years following departure from the school and until the pupil reaches 25 years old respectively. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

If you have any specific queries about how our 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 Bursar (contact details listed in section 13). 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”

Kew College Prep has ***Record Management Guidelines*** to establish guidelines and procedures for identifying, retaining, protecting, storing and disposing of records and documents (“Records”) belonging to the school. Protection of Records is a key element of corporate security and the responsibility of all staff. Good record retention and appropriate disposal of Records are essential components of the school’s commitment to integrity, the effective overall management of the School, and compliance with regulatory and legal obligations.

9. 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 and 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, as appropriate, with organisations set up to help establish and maintain relationships with the school community, such as our parents’ group, Kew College Prep PTA.
- Contact parents by post, newsletter and email in order to promote and raise funds for the School and, where appropriate, other worthy causes supported by the School
- Should you wish to limit or object to any such use, or would like further information about them, you should contact the Registrar in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the School is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

The school has an alumni database, and parents of alumni and/or alumni have opted into being contacted for this purpose.

10. YOUR RIGHTS

Under data protection law, you have a number of rights in relation to your personal data. These include the right to be informed about how we use personal data; the right to request access to the personal data we hold about them; the right to request correction of inaccurate or incomplete data; the right to request erasure of personal data in certain circumstances; and the right to request that we restrict the processing of personal data. Individuals may also have the right to object to processing, particularly where we rely on legitimate interests, and the right to receive their personal data in a structured, commonly used format where applicable. In addition, individuals have rights in relation to automated decision-making,

although the School does not make decisions about individuals based on automated processing.

The School will respond to written requests without undue delay and, in any event, within statutory time-limits (normally one month). In some cases, where requests are more complex or multiple requests are made, the response period may be extended by up to a further two months, in accordance with data protection law.

Any individual who wishes to access their personal data, request its correction or transfer to another organisation, or object to how their personal data is processed, should submit their request in writing to the Bursar (see contact details at the end of this document).

Rights of access, etc.

The School is best placed to respond promptly to focused and specific requests for information. Where a request is considered manifestly unfounded, excessive, or repetitive, the School may ask you to refine the scope of your request. In certain circumstances, and where permitted by data protection law and relevant regulatory guidance, the School may also charge a reasonable fee to cover administrative costs associated with processing the request.

If you consider that the personal data we hold on you is inaccurate, please let us know. The School will not necessarily delete or amend views, opinions, notes or records purely the request of an individual who disputes the account, however, but we may keep a record of all parties' viewpoints.

Requests that cannot be fulfilled

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, potentially including mock exam scripts or other types of exams used to assess performance); provide examination or other test marks ahead of ordinary publication, nor share any confidential reference held by the School that was (or will be) given by the school itself for the purposes of the education, training or employment of any individual.

With regard to the "right to be forgotten", there may on occasion be compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a proportionate legitimate interest identified in this Privacy Notice. Generally, if the School still considers the processing of the personal data to be reasonably necessary, it is entitled to continue. 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 their behalf.

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. Requests not considered to be in the child's best interests may sometimes be refused.

Pupils aged 13 years 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. Slightly younger children may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

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 Terms and Conditions. Where parents are separated/divorced, 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, court orders or pastoral issues.

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

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 rely on consent are: certain types of use 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. a 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, through the Acceptance 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, either alongside or in place of parental 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 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.

Pupils are required to respect the personal data and privacy of others, and to comply with the School's "Responsible Internet Use – Rules for pupils".

11. 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 ensure that they update Schoolbase and notify the Registrar 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). See above for details of why the school may need to process your data, and who you should 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.

12. THIS STATEMENT

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. This Privacy Notice was last updated on 17 June 2026.

13. QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the Bursar using the contact details below.

If an individual believes that the School has not complied with this Privacy Notice or acted otherwise than in accordance with data protection law, they should notify the Bursar using the contact details below, and can utilise the School complaints procedure as outlined in the Complaints Policy. The School will acknowledge your complaint within 30 days of receipt and will investigate and inform you of the outcome of your complaint without undue delay (keeping you informed of progress as necessary).

If you are not satisfied with the outcome of your complaint, or if you feel that the School has not handled it appropriately, you have the right to complain to the [Information Commissioner's Office](#)

14. CONTACT DETAILS

Bursar and Clerk to the Governors: Lucas Carlisle (email: lcarlisle@kewcollegeprep.com TEL: 020 8940 2039)

Or write to the above at:

Kew College Prep
24-26 Cumberland Road
Kew
Surrey
TW9 3HQ