SUTTON VALENCE SCHOOL
SINCE 1576

Privacy Notice

(Prep School and Senior School)

Author: Mr Glen Millbery
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Next Review Date: September 2026

This Policy applies to Sutton Valence School (including, as the context requires, the Nursery, the Prep School and the Senior School).

Who we are

Sutton Valence School ("the School") is a part of The United Westminster and Grey Coat Foundation. The School is a data controller for the purposes of data protection law and operates from the following address:

Sutton Valence School
North Street
Sutton Valence
Kent
ME17 3HL

The United Westminster and Grey Coat Foundation (which is a registered charity, number 1181082) can be contacted at:

57 Palace Street
London
SW1E 5HJ

What is this privacy notice for

This privacy notice is intended to provide information about how the School will use (or "process") personal data about individuals including: its staff (current, past and applicants); its current, past and prospective pupils; and their parents, carers or guardians (referred to in this policy as "parents").

This information is provided because data protection law gives individuals rights to understand how their data is used. Staff, parents and pupils are all encouraged to read this privacy notice and to understand the School's obligations.

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;
- any outside hirings;
- any contractors used by the School;

- the School's policy on taking, storing and using images of children;
- the School's CCTV policy;
- the School's Data Protection policy, including its retention of records policy;
- the School's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the School's IT policies, including its Online Safety policy, Cyber Bullying policy, Technical Security policy, Mobile Technology policy, policy on Use of Digital and Video images, Social Media policy, Electronic Devices – searching and deletion policy and Acceptable Use policies.

This privacy notice does not form part of any employee's contract of employment and may be amended from time to time (see the section **This Policy** below for further details).

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

Responsibility for Data Protection

The School's registration number with the Information Commissioner's Office is Z5579319. It has appointed Mr Glen Millbery as its Data Compliance Officer who will deal with all your requests and enquiries concerning the School's uses of your personal data (see section on **Your Rights** below) and endeavour to ensure that all personal data is processed in compliance with this policy and data protection law.

The Data Compliance Officer can be contacted at millberyg@svs.org.uk or on 01622 845292 or at the above School address.

Why the School 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 (including current, past and prospective staff, pupils or parents) as part of its daily operation.

The School will need to carry out some of this activity in order to fulfil its legal rights, duties or obligations – including those under a contract with its staff, or parents of its 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 its (or its community's)

legitimate interests:

- To promote the School to prospective pupils and parents, including through its prospectus, website and social media;
- For the purposes of pupil selection, to confirm the identity of prospective pupils and their parents, to process pupil registrations and all procedures necessary for the offer and acceptance of a place at the School including items such as Open Mornings, mailshots associated with the School's admissions process and the payment of a deposit;
- To provide education services generally including SEN, musical education, drama education, the CCF, the Duke of Edinburgh Scheme, physical training/education or spiritual development, careers services, co-curricular activities to pupils including School trips, and monitoring and reporting on pupils' progress, behaviour and educational needs;

- To allow pupils to access certain educational websites that require some personal information to set up login details;
- To allow pupils, staff and parents to access the School's sports website;
- To assist prospective and current pupils and parents with applications for a visa to study in the UK, if required;
- To assist pupils in making applications for universities, apprenticeships, jobs or other further courses of study generally;
- To offer ancillary services such as pupil health insurance or other School-related insurance products to parents and pupils;
- Maintaining relationships with alumnae and the School community, including direct marketing or fundraising activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests;
- To allow management and oversight of the School generally, including reporting to Governors, recording decisions made and discussions in management meetings, staff management and communication, and generally for the efficient management of the School;
- 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 staff and pupils' welfare and provide appropriate pastoral care, including recording incidents of actual or alleged harassment or bullying in accordance with our Safeguarding, Anti-Bullying and IT policies, and liaising with the education guardian of an overseas pupil where required;
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's IT policy;
- To enable the fair application of School rules and policies and any appropriate rewards or sanctions, including their recording;
- To monitor the effectiveness of communications to parents, including tracking when parents open and read electronic communications;
- To monitor the use of the IT systems through filtering and monitoring systems;
- 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 Use of Digital and Video Images and Social Media;
- For staff recruitment purposes, appraisal, giving and receiving of references, staff vetting purposes e.g. with regard to safeguarding, staff training, confirming staff qualifications, disciplinary and grievance purposes, and generally for all matters related to staff administration;
- To secure funding for the School (and where relevant, for individual pupils at the School) and to make decisions about which parents should benefit from bursary assistance;
- For security and safety purposes, including images captured on CCTV in accordance with the School's CCTV policy;
- To allow planning for and actions taken as a result of unforeseen events which may require an emergency response;
- To carry out or cooperate with any School or external complaints, disciplinary, review or investigation process; 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 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 accidents, 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, or to provide educational services for a pupil with a disability or other physical, behavioural or social difficulty;
- To provide spiritual education or provide for individuals' religious observance in the context of any religious beliefs;
- In connection with employment of its staff, for example DBS checks, payment of salaries, welfare, membership of a union or of pension plans;
- 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 safeguarding, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

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;
- car details (about those who use our car parking facilities);
- bank details and other financial information, e.g. about parents who pay fees to the School or about staff to enable payment of salaries;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), records of behaviour including sanctions applied, and examination scripts and marks;
- personnel files, including in connection with academics, employment or safeguarding;
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- references given or received by the School about pupils and staff, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- staff attendance records, appraisals, records of disciplinary sanctions, details of previous employment and results of vetting checks;
- background checks on visitors where necessary to comply with vetting procedures;
- correspondence with and concerning staff, pupils and parents past and present;
- internet usage including online search terms, sites visited and blocked and related meta-data such as device (user), protocol, website, location, time and date;
  device usage including logs of device activity including apps used, keystrokes entered, features used, networks accessed and screen captures and
- images of pupils (and occasionally other individuals) engaging in School activities, and images captured by the School's CCTV system (in accordance with the School's policy on Use of Digital and Video Images, Social Media and its CCTV Policy).

How the School collects data

Generally, the School receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

Our website collects only the following data about those who visit it: the name of the domain from which the internet is accessed, the date and time our site is visited, and the address of the website from which our site was linked to. We use the information we collect to measure the number of visitors to the different sections of our site, and to help us make our site more useful to visitors. We will not obtain personal information about those who visit our site, unless they choose to provide such information to us.

Data is also recorded through systematic monitoring of internet and device usage.

However, 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 occasionally collected from publicly available resources.

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, debt collectors and accountants);
- government authorities (e.g. HMRC, DfE, police or the local authority);
- appropriate regulatory bodies (e.g. the Teaching Regulation Agency, the Independent Schools Inspectorate, the Charity Commission and the Information Commissioner);
- examination awarding bodies (e.g. Edexcel, AQA, OCR, CIE, Lamda, and the Associated Board of the Royal Schools of Music);
- organisations who provide online testing (e.g. CEM, Morrisby and Testwise);
- organisations who provide co-curricular opportunities (e.g. the MoD for CCF related information and the Duke of Edinburgh's Award);
- organisations who provide websites that enhance the curriculum and availability of information (e.g. SchoolSports, MyMaths and Educake);
- organisations who provide services in line with both the legitimate interests and legal responsibilities of the school (CPOMS, Smoothwall);
- Organisations who provide services in line with the legitimate interests of the School but who process the data as data controllers in their own right (e.g. Unifrog, PracticePal, Vectare (coach booking and tracking)).

Data is also shared with the head office of the United Westminster and Grey Coat Foundation which, although part of the same legal entity as the School, has a separate privacy notice.

For the most part, personal data collected by the School will remain within the School and will be processed by appropriate individuals only on a 'need to know' basis. Particularly strict rules of access apply in the context of:

- medical records held by the Medical Centre and accessed only by the School doctor and appropriate medical staff under their 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 LADO or police. For further information about this, please view the School's Safeguarding Policy.

Finally, in accordance with data protection law, some of the School's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions.

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 it for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep staff and pupil personnel files is up to 25 years following departure from the School for the time being, this will reduce over the next few years. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. In particular, the Independent Inquiry into Child Sexual Abuse has issued guidance to all schools in respect of pupil and staff records; as a result of that guidance, our current approach is to retain these indefinitely until further notice. Whilst there are maximum retention dates, data may be deleted prior to this if it is deemed to be no longer required.

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 Data Compliance Officer. However, please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such a request.

A limited and reasonable amount of information will be kept for archiving purposes, for example and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

The principles applied in formulating the School's approach to data retention are to consider the following factors:

- Legal requirements to keep data for a minimum amount of time, for example as stipulated by the Companies Act in terms of accounting records;
- Legal requirements placed on the School, such as those in relation to safeguarding which may necessitate the keeping of records for an extended period
- Guidance issued by competent authorities such as the Independent Inquiry into Child Sexual Abuse mentioned above
- The desirability of reducing the amount of personal data held on the School's IT network by applying a cut-off point so that all files last used before the cut-off point are archived
- The need to retain data for a time after a child or member of staff leaves the School in order to protect the School's legitimate interests, such as in the case of a claim related to a historic incident
- The legitimate interests of the School in terms of efficient management of pupils and staff, balanced against their rights to and legitimate expectations of privacy

Keeping in touch and supporting the School

The School will use the contact details of parents, alumnae and other members of the School community to keep them updated about the activities of the School, or alumnae and parent events of interest, including sending updates and newsletters by email and by post. Unless the relevant individual objects, the School will also:

- Share personal data about parents and/or alumnae, as appropriate, with organisations set up to help establish and maintain relationships with the School community, such as the Old Suttonians Association, the Friends of Sutton Valence School and the Sutton Valence Prep School Parents Association;
- Contact parents and/or alumnae (including via the organisations above) by post and email in order to promote and raise funds for the School or other worthy causes;
- Should you wish to limit or object to any such use, or would like further information about such use, please contact the Data Compliance Officer. 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).

Your rights

Rights of access

Individuals have various rights under data protection law to access and understand personal data about them held by the School and in some cases ask for it to be erased or amended or have it transferred to others, or for the School to stop processing it – but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request to the Data Compliance Officer although any request to the School or any member of staff is acceptable in line with the SAR Policy.

The School will endeavour to respond to any such requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one month in the case of requests for access to information).

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 **or received** 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 your (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 their behalf.

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 12 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. Younger children may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

Parental requests

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 in or expectation of receiving certain information about pupils without their consent. The School may consider there are lawful grounds for sharing this data with or without reference to that pupil.

Parents will in general receive educational and pastoral updates about their children, in accordance with the normal procedures of the School such as School reports, parents' evenings and 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.

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). An example of where we rely on consent is for the use of images of pupils in promotional material. Please be aware however that even if you have given your consent to process a particular item of data, the School may not be relying on your consent but have another lawful reason to process the personal data in question.

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 the Old Suttonian Association, The Friends of Sutton Valence School or the Sutton Valence Prep School 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 taking all the circumstances into account.

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 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 IT Policy and the School rules. Staff are under professional duties to do the same covered under the same 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 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 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, of who you may contact if you disagree.

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to School systems. All staff and governors will be made aware of this privacy notice and the related Data Protection 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

Any comments or queries on this policy should be directed to the Data Compliance Officer using the contact details in the **Responsibility for Data Protection** section above.

If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with data protection law, they should utilise the School complaints procedure and should also notify the Data Compliance Officer. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.