



DENSTONE  
COLLEGE

Notice last reviewed: August 2024  
Next Review to be completed by: August 2025

## PRIVACY NOTICE

Denstone College was founded in 1873 and is a co-educational boarding and day school set in beautiful grounds in rural Staffordshire. Children are encouraged to embrace possibility, both inside and outside the classroom. Denstone College is a wholly owned subsidiary of The Woodard Corporation and is registered with the charity commission under charity number 1102588 and is a limited liability company registered with Companies House under company registration number 05010957. The College has a subsidiary company, Denstone College Enterprises Ltd, company registration number 05181951, whose principal activity is the letting of the College premises and retailing. This Privacy Notice is intended to cover the activities of Denstone College Ltd and Denstone College Enterprises Ltd.



## WHAT THIS PRIVACY NOTICE IS FOR?

This Notice is intended to provide information about how Denstone College use (or “process”) personal data about individuals including: its staff; its current, past, and prospective pupils( Including EYFS) ; and their parents, carers, or guardians (referred to in this Notice as "parents") our vendors (suppliers) and, in the case of its Enterprise company, its clients. As such Denstone College is the “data controller”.

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 understand Denstone College’s obligations to its entire community – parents, pupils, former parents, our alumni, staff, and former staff, as well as any others who have links with Denstone College.

This Privacy Notice applies alongside any other information Denstone College 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 Denstone College's other relevant terms and conditions and policies, including:

- Any contract between Denstone College and its staff or the parents of pupils;
- Denstone College's policy on taking, storing, and using images of children;
- Denstone College's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- Denstone College's IT policies.
- Denstone College's Admissions Policy
- Denstone College's Data Protection Policy
- Denstone College's Records Management and Retention Policy
- Denstone College's Fundraising and Development Privacy Notice

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

## DATA PROTECTION CONTACT

Denstone College has appointed the GDPR & Compliance Manager as Data Protection Co-ordinator who will deal with all your requests and enquiries concerning Denstone College’s use of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this Notice and Data Protection Law.

Enquiries can be submitted via email to [compliance@denstonecollege.net](mailto:compliance@denstonecollege.net) or in writing to the GDPR & Compliance Manager, Denstone College, Uttoxeter, Staffs, ST14 5HN.

## WHY THE COLLEGE NEEDS TO PROCESS PERSONAL DATA

To carry out its ordinary duties to staff, pupils, and parents, Denstone College 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.

Some of this activity Denstone College will need to carry out to fulfil its legal rights, duties, or obligations – including those under a contract with its staff, or parents of its pupils and in some cases in their vital interests.



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

Denstone College 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 admission into Denstone College (and to confirm the identity of prospective pupils and their parents); Pupil recruitment services including overseas agents;
- To provide education services, including but not limited to musical education, physical training or spiritual development, career services, and extra-curricular activities including sporting events to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with alumni and the Denstone College community including The Old Denstonian Club and Denstone Parents' Events, enabling us to keep the College community informed about key College events and celebrations, direct marketing or fundraising activities. You can find further information on the legitimate interests used by our Development Department in our fundraising and Development Privacy Notice - [Found here.](#);
- For the purposes of donor due diligence, and to confirm the identity of prospective donors, their background, and relevant interests;
- 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 Denstone College'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 and staff;
- 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 Denstone College;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of Denstone College's IT and communications systems in accordance with Denstone College's IT Acceptable Use Policy;
- To make use of photographic images and videos of pupils in College publications, College displays, on the Denstone College website and (where appropriate) in accordance with Denstone College's policy on taking, storing, and using images of children;
- To allow us to showcase the talents, achievements and activities of our school community via live streaming which may involve spectators;
- For security purposes including CCTV;
- To carry out or co-operate with any College or external complaints, disciplinary or investigation process;
- Where otherwise reasonably necessary for Denstone College's purposes, including to obtain appropriate professional advice and insurance for Denstone College;
- To enable pupils to benefit from a range of online educational learning platforms to aid performance and benefit from teaching and access to resources online where applicable, e.g., via MS Teams;
- To support pupils with further education and progression;
- To co-operate with transport providers;
- For the purposes of offering a secure and worthwhile boarding experience;
- To enable our community to take up swimming lessons;
- To offer a school photography and sports photography portfolio to Denstone families.



In addition, Denstone College 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 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 co-operation with police or social services, for insurance purposes or to caterers or organisers of educational visits and trips who need to be made aware of dietary or medical needs. Please note that in order to safeguard pupils' welfare and provide appropriate pastoral care, the College do consider that it is in the legitimate interests of parents and pupils to circulate widely to all staff some conditions (for example details of pupils' allergies and asthma) which might impact pupils in any situation whilst at College and which would enable a swifter and more effective response to any medical problems by any staff member who is present;
- To provide educational services in the context of any special educational needs of a pupil;
- To provide spiritual education in the context of any religious beliefs;
- In connection with employment of its staff, such as 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;
- For the engagement of external parties for professional support;
- As part of any College 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.

Denstone College will adhere to the Data Protection Law and UK GDPR to ensure that we process personal data safely and securely. When considering a new activity involving the processing of personal data, we will assess any risks and mitigate those risks where possible by conducting a Data Protection Impact Assessment checklist where required. Further information about this process can be found in our [Data Protection Policy](#).

## **TYPES OF PERSONAL DATA PROCESSED BY DENSTONE COLLEGE**

This will include by way of example:

- Names, addresses, telephone numbers, e-mail addresses and other contact details;
- Date of birth;
- Car details (about those who use our car parking facilities);
- Bank details and other financial information e.g., about parents who pay fees to Denstone College or contractors. Staff will be required to provide information for payroll;
- Past, present, and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- Personnel files to also include proof of identification, including in connection with academics, employment, volunteers, governors or safeguarding;
- Where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- References given or received by Denstone College about pupils or staff, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;



DENSTONE  
COLLEGE

- Correspondence with and concerning staff, pupils, and parents past and present;
- Images and videos of pupils (and occasionally other individuals) engaging in College activities (in accordance with Denstone College's policy on taking, storing, and using images of children);
- CCTV footage for site safety and security including child protection and safeguarding of our pupils.

### HOW THE COLLEGE COLLECTS DATA

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

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

### WHO HAS ACCESS TO PERSONAL DATA AND WHO THE COLLEGE SHARES IT WITH?

Denstone College will need to share personal information relating to its community with third parties, such as:

- Professional advisers e.g., lawyers, insurers, PR advisers, debt recovery agents and accountants, anti-money laundering agencies;
- Government authorities e.g., HMRC, DfE, UKVI, Police or the Local Authority;
- Appropriate regulatory bodies e.g., Teaching Regulation Agency, the Independent Schools Inspectorate, the Charity Commission, or the Information Commissioner, HSE;
- Travel Agents, for the booking and arrangements of school trips;
- Examination boards e.g., JCQ or Baseline Testing providers e.g., CEM;
- Outdoor Pursuits, sporting organisations e.g., Duke of Edinburgh, True Adventure, England Hockey, Royal Lifesaving Society UK;
- For the purpose of managing our alumni community, careers programme and fundraising activities, including partners supporting the work of the Denstone Foundation for example wealth screening partners. (For further information about who our Development Office may share information with please refer to our Fundraising and Development Privacy Notice found on the school website;
- Educational learning platforms and further education platforms, e.g., online resources to aid learning;
- International Agents as part of the admissions process for pupils joining the College from Overseas;
- Commercial Enterprise partners, e.g. Schoolhire;
- Online photo galleries, e.g. Pixieset;
- Contractors who help us with our work, e.g. where information is stored in a cloud database;
- Transportation providers.

We will limit the sharing of data to what is necessary for the purpose and, for the most part, personal data collected by Denstone College will remain within the College 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 which are held and accessed only by the Denstone College nursing team and appropriate medical staff under their supervision, or otherwise in accordance with express consent; medical information may need to be shared with the NHS, Counsellors, specialist assessors or CAMHS to provide vital care.
- 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.



DENSTONE  
COLLEGE

Staff, pupils, and parents are reminded that Denstone College 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 or Police. For further information about this, please view Denstone College's Safeguarding Policy.

Finally, in accordance with Data Protection Law, some of Denstone College's processing activity is carried out on its behalf by third parties or by joint controllers, such as IT and MIS systems and software providers. Some of the companies we work with will include VISA advisors and processors, photographers, web developers or cloud storage providers.

We may also use trusted third-party partners to help with the work of the Development Office, such as printing companies, consultants and partners who automate some of our work, including prospect research. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with Denstone College's specific directions. Denstone College will conduct privacy and security checks on such third parties before partnering with them to ensure that the appropriate safeguards are in place.

### **PHOTOGRAPHS AND VIDEOS**

Denstone College may take photographs or videos of pupils/parents/alumni or visitors. The College may use these images for marketing purposes on our website, social media, in our prospectus or other printed publications that we produce. We like to keep our Denstone College community, including parents and pupils, informed of activities and achievements. We want to ensure that you have access to images of your children, highlighting their time at Denstone College and may offer you access to digital images via an online gallery giving you the opportunity to purchase prints too. If you have any questions regarding the use of photographs or wish to withdraw your consent for the use of photographs please contact [staffsecretary@denstonecollege.net](mailto:staffsecretary@denstonecollege.net).

Images and videos are often used for educational purpose; for example Denstone College Prep uses an online journal to help record all learning and fun of the children's early years of education enabling parents to share in their child's development during their journey at The Prep.

Occasionally Denstone College may be visited by the media who will report on high profile events and record video footage or take photographs. Pupils may appear in local or national newspapers and magazines. Denstone College will ask for consent where required before photographing or filming pupils, in line with Data Protection Regulations.

### **VISITORS TO OUR WEBSITE**

All visitors to our website will have the option to manage their cookie preferences. A cookie is a small file placed on a computer's hard drive. It enables the website to identify that users have returned to that particular website. Cookies allow websites to store your preferences to ensure that you are provided with the content, options, and functions that you have chosen. They also enable us to identify trends and how many people visit our website. By using cookies, we do not have access to an individual's computer or any other information about them other than what they choose to share with us.

If an individual does not want the College to store Cookies on their computer, they will need to set this preference on their web browser to refuse cookies or they can manage which cookies we use via our website. If you choose to refuse cookies this may affect some of the functions of our website and some functions may be unavailable.



## HOW LONG DO WE KEEP PERSONAL DATA?

Denstone College will retain personal data securely and only in line with how long it is necessary to keep it for a legitimate and lawful reason, in line with our Records Management & Retention Policy. Typically, the legal recommendation for how long to keep ordinary staff and pupil personnel files is up to seven years following departure from Denstone College. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements, and Denstone College will look to implement the recommendations contained within the IRMS guidance.

If you have any specific queries about how our Records Management & 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 Compliance team. However, please bear in mind that Denstone College will often have lawful and necessary reasons to hold onto some personal data even following such requests.

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 to fulfil your wishes (called a "suppression record").

A selection of personal data is retained permanently for research, statistical or historical purposes in Denstone College's Archives. The Archives exist to preserve material relating to the origins and development of Denstone College as well as to the activities and achievements of its staff and pupils. Personal data may be contained in paper and digital records as well as photographs, audio-visual material, uniform, artwork, and objects.

## KEEPING IN TOUCH AND SUPPORTING DENSTONE COLLEGE

Denstone College will use the contact detail of parents, alumni and other members of the Denstone College community to keep them updated about the activities of Denstone College, or alumni and parent events of interest. Updates will be sent by publications and newsletters, by email, by professional networks and by post. Unless the relevant individual objects, Denstone College will also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the Denstone College community, such as the Alumni & Development Office, Denstone Parents' Events and the Old Denstonian Club;
- Contact parents and/or alumni (including via the organisations above) by telephone, social media, text message, post, or email to promote and raise funds for Denstone College and, where appropriate, other worthy causes;
- Collect information from publicly available sources about parents' and former pupils' occupation and activities, to maximise Denstone College's fundraising potential.

Should you wish to limit or object to any such use, or would like further information about them, please contact the Compliance team via [compliance@denstonecollege.net](mailto:compliance@denstonecollege.net). You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, Denstone College 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 the data subject

The GDPR provides various rights for individuals including:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure



5. The right to restrict processing
6. The right to data portability
7. The right to object
8. The right not to be subject to decision based solely on automated processing

Individuals have a right to understand the personal data about them held by Denstone College, and in some cases ask for it to be erased or amended or have it transferred to others, or for Denstone College to stop processing it – but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data or wishing for it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should ideally put their request in writing where possible to the Compliance team using the contact details at the start of this document. Subject Access Requests can be sent via email. However, it is important to know that Subject Access Requests following this route during College holidays may be delayed as staff may not actively monitor their emails during College holidays.

Denstone College will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one calendar month in the case of requests for access to information, but this can be extended by a further two months if the request is complex or a number of requests are received from an individual, e.g., for other types of requests relating to individuals' rights). We will notify you when we have received the request. A reasonable search will be carried out.

Denstone College 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, Denstone College may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it). Denstone College may ask you to complete their Subject Access Request form which enables them to understand your request in more detail and gather the relevant information for you. Please be aware that references are given in confidence and will not be disclosable as part of a Subject Access Request.

### **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 Denstone College, or documents prepared in connection with a legal action).

Denstone College 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 Denstone College 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 Denstone College, 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.

Pupils at 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. 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. Denstone College 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, Denstone College 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. Financial information will not be shared with any parent who has, by exception and in rare situations, passed sole financial responsibility for fees and extras to the other parent with the express agreement of Denstone College.

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 Denstone College 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 certain types of uses of images and certain types of fundraising activity. Please be aware however that Denstone College may not be relying on consent but have another lawful reason to process the personal data in question even without 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.

If you wish to withdraw your consent or change your consent preferences all requests should be put in writing to the Staff Secretary, Denstone College, Denstone, Staffordshire, ST14 5HN or via email to [staffsecretary@denstonecollege.net](mailto:staffsecretary@denstonecollege.net).

### **Whose rights?**

The rights under Data Protection Law belong to the individual to whom the data relates. However, Denstone College 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



DENSTONE  
COLLEGE

should be aware that this is not necessarily the same as Denstone College 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, Denstone College 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 Denstone College'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, Denstone College may be under an obligation to maintain confidentiality unless, in Denstone College's opinion, there is a good reason to do otherwise; for example, where Denstone College 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 Denstone College's rules and regulations. Staff are under professional duties to do the same covered under the relevant staff policies.

#### **DATA ACCURACY AND SECURITY**

Denstone College 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 Head's Office, [head@denstonecollege.net](mailto:head@denstonecollege.net) of any significant changes to essential 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 Denstone College may need to process your data, of who you may contact if you disagree.

Denstone College 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 College systems. All staff and governors will be made aware of these policies and their duties under Data Protection Law and receive relevant training.

#### **THIS PRIVACY NOTICE**

Denstone College 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 Notice should be directed to the Compliance team using the following contact details; [compliance@denstonecollege.net](mailto:compliance@denstonecollege.net) or GDPR & Compliance Manager, Denstone College, Uttoxeter, Staffs, ST14 5HN. Telephone: 01889 590 484

If an individual believes that Denstone College has not complied with this Notice or acted otherwise than in accordance with Data Protection Law, they should utilise Denstone College's Complaints Procedure (for parents) or Grievance Procedure (for staff) and should also notify the Head of Compliance.



DENSTONE  
COLLEGE

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 Denstone College before involving the regulator.