



REDHILL

PREP SCHOOL & MONTESSORI NURSERY

Data Protection Privacy Notices (GDPR)

Privacy notice for parents and guardians

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **pupils and their parents**. This notice should be read alongside our Data Protection Policy, Safeguarding Policy, E-Safety Policy, Complaints Policy and Records Retention Schedule, as required under Part 3 of the Independent School Standards (Wales).

We, Redhill Prep School & Montessori Nursery, The Garth, Haverfordwest, SA61 2UR are the 'data controller' for the purposes of data protection law.

Our nominated Data Protection Lead is Jo Morris, Office Administrator. This is not a statutory Data Protection Officer (DPO) role as defined in the Data Protection Act 2018. The Headteacher retains overall responsibility for data protection compliance.

We process personal data under the following UK GDPR Article 6 bases:

- Contractual necessity – to deliver the education and services set out in the parent contract.
- Legal obligation, e.g. safeguarding, census returns.
- Vital interests – to protect a child in an emergency.
- Consent – where we rely on permission, e.g. use of photographs in marketing.
- Legitimate interests – in limited circumstances, e.g. fundraising or alumni relations.

For special category data, we rely on UK GDPR Article 9(2)(g) 'substantial public interest' (safeguarding, equality of opportunity), and (h) health/social care.

The personal data we hold:

Personal data that we may collect, use, store and share (when appropriate) about pupils and their parents includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents
- Parental contact details, employment and financial information

- Attendance at open days & registration for school events
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics, such as ethnic background or additional learning needs
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs
- CCTV images captured in school
- Feedback provided to us about our service

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education.

Why we use this data:

- Support pupil learning and appropriately customise teaching
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Protect pupil welfare and safeguard their wellbeing
- Assess the quality of our services and identify improvements
- Administer admissions waiting lists
- Carry out research and evaluation
- Comply with the law regarding data sharing
- Enrol pupils for exams and other external assessments
- Liaise with parents on a range of matters connected with their children's schooling
- Process financial and legal obligations to and on behalf of parents

We do not use personal data to make automated decisions about pupils or parents that would have a legal or significant effect.

Our legal basis for using this data

We only collect and use pupils' and parents' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation such as the contract for services you have with us to provide your child with an education in return for school fees.
- We need it to perform an official task in the public interest

Less commonly, we may also process pupils' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use pupils' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using pupils' and parents' personal data overlap, and there may be several grounds which justify our use of this data.

Collecting this information

While the majority of information we collect about pupils and parents' is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying, which in some cases could prevent us from providing a service or lead to us withdrawing a service.

How we store this data

We keep personal information about pupils and their parents while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. Our Data Protection Policy sets out how long we keep information about pupils.

Data sharing

We do not share information about pupils with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about pupils and their parents with, for example:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- The Department for Education/Welsh Government – to comply with statutory requests for census data
- Other schools, nurseries or educational settings – when pupils move to or from Redhill, to ensure a smooth transition and continuity of learning and care
- The pupil's family and authorised representatives
- Educators, examining, and awarding bodies – to enable enrolment in exams and issue of certificates
- Our regulator Estyn – to meet inspection requirements
- Suppliers and service providers – to enable contracted services (e.g. school management software, catering, wraparound care booking platforms such as *Magic Booking*, or cloud-based educational tools)

- Professional advisers, auditors, and consultants – to ensure compliance, operational efficiency, and improvement
- Debt recovery agencies – to recover unpaid fees or charges in line with contractual terms
- Survey and research organisations – to assess service quality
- Health authorities and social welfare services – to support pupil welfare and safeguarding
- Charities and voluntary organisations – for fundraising or enrichment activities
- Police, courts, and tribunals – where required for safeguarding or legal processes
- Professional bodies – to enhance educational provision

Please note: This list is not exhaustive. From time to time, we may share personal data with other third parties where there is a lawful basis to do so under the UK GDPR (for example, organisations providing educational or administrative services under contract with the school).

All such organisations are required to keep personal information secure and use it only for the specific purposes for which it was provided, in accordance with UK data protection law and the school's Data Protection Policy.

Transferring data internationally

If we transfer personal data outside the UK, we ensure compliance with UK GDPR Chapter V, using adequacy regulations or standard contractual clauses approved by the UK Government.

Parents and pupils' rights regarding personal data

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

If you make a subject access request, and if we do hold information about you or your child, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our Data Handling Lead.

Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations To exercise any of these rights, please contact our Data Handling Lead.
- We will usually consider pupils under 12 as not mature enough to understand and exercise their rights, but we will assess capacity on a case-by-case basis.

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our Data Handling Lead.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Retention periods

- Admissions records - 7 years after pupil leaves
- Safeguarding records - until pupil is 25
- Financial records - 7 years for HMRC compliance
- Medical records - until pupil leaves school (or longer if safeguarding applies)
- Transition Records (e.g. pupil transfer information, assessment summaries, safeguarding files) - until the pupil is 25 if safeguarding applies.

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data handling lead Jo Morris, Office Administrator, office@redhillprepschool.co.uk

Our nominated Data Protection Lead is Jo Morris, Office Administrator. This is not a statutory Data Protection Officer (DPO) role as defined in the Data Protection Act 2018. The Headteacher retains overall responsibility for data protection compliance.

This notice is based on the [Department for Education's model privacy notice](#) for pupils, amended for parents and to reflect the way we use data in this school.

Date reviewed: September 2025

Date for next review: September 2026

Person responsible for this policy: Headteacher