

PRIVACY POLICY FOR PARENTS / GUARDIANS / CARERS

Under data protection law, individuals have a right to be informed about how David Game College (DGC, or “the College”) 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 parents/guardians/carers.

David Game College, 31 Jewry Street, London, EC3N 2ET, is the data controller for the purposes of data protection law.

Our Data Protection Officer (DPO) is Hussaina Choudhury (see *Contact us* below).

The Personal Data We Hold

You may find it helpful to refer to the Information Commissioner’s Office (ICO) definitions of *personal data* and *special category personal data* under UK GDPR.

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

- Contact details, contact preferences, date of birth, identification documents (e.g. copy of passport)
- Emergency contact details
- Results of internal assessments and externally set tests
- Entry test results
- Pupil personal details and curricular records
- Visa-related details and documentation
- Characteristics such as ethnic background, aptitude test results or special educational needs
- Exclusion information
- Medical information, 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 on College premises and retained for up to 28 days
- Data processed via educational technology (EdTech) platforms

We may also process personal data relating to parents/guardians/carers, including names, contact details, relationship to the pupil, communications with the College, and billing or fee-related information.

We may also hold data about pupils received from other organisations, including previous schools or colleges, local authorities, safeguarding agencies, and the Department for Education.

Why We Use This Data

We use personal data to:

- Support pupil learning and academic progress
- Monitor and report on attainment and achievement
- Provide appropriate pastoral, boarding, and safeguarding support
- Protect pupil welfare
- Assess the quality of our services
- Administer admissions and waiting lists
- Comply with immigration, safeguarding, and regulatory requirements

David Game College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all children fulfil their potential

- Carry out research where appropriate
- Comply with the law regarding data sharing

Our Legal Basis for Using This Data

We only collect and use personal data when the law allows us to do so. Most commonly, we process data where:

- We need to comply with a legal obligation
- We are carrying out a task in the public interest
- Processing is necessary for the performance of a contract (for example, admissions, fees, or boarding provision)

Less commonly, we may also process personal data where:

- We have obtained consent for a specific purpose (e.g. photographs or marketing)
- Processing is necessary to protect vital interests (e.g. medical emergencies)

We do not rely on consent where another lawful basis applies, particularly in relation to safeguarding or statutory duties.

Where consent is used, it may be withdrawn at any time. We will make this clear when consent is sought and explain how it can be withdrawn.

Collecting This Information

While the majority of information we collect about pupils is mandatory, some information may be provided voluntarily. Whenever we seek to collect information, we make it clear whether providing it is mandatory or optional and explain the possible consequences of not providing mandatory information.

How We Store This Data

We keep personal data about pupils while they are attending the College. We may also retain data after a pupil has left where this is necessary to comply with legal or regulatory obligations.

Our Records Retention Policy, available on our website, sets out how long different categories of personal data are retained.

Data Sharing

We do not share personal data unnecessarily. Where it is legally required or permitted, and in line with data protection law, we may share personal data with:

- Local authorities (including for safeguarding and exclusions)
- The Department for Education
- Examination and awarding bodies
- The pupil's family and authorised representatives
- Our regulator (ISI)
- Suppliers and service providers (e.g. Furlong Solutions, which provides the College portal)
- Financial organisations
- Central and local government
- Auditors
- Health authorities and social care organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, and tribunals
- Professional bodies

Data sharing does not always require consent, particularly where there is a legal obligation or safeguarding concern.

National Pupil Database (NPD)

We are required to provide information about pupils to the Department for Education as part of statutory data collections, such as the school/college census. Some of this data is stored in the National Pupil Database (NPD), which is owned and managed by the Department for Education and used to support research and statistical analysis.

Further information about the NPD is available from the Department for Education.

Youth Support Services

We are legally required to pass on certain information about pupils to the City of London Local Education Authority, which has responsibilities for education, training, and careers services for young people aged 13–19.

Parents/guardians, or pupils once aged 16 or over, may request that only the individual's name, address, and date of birth are shared by contacting the Data Protection Officer.

Transferring Data Internationally

Where personal data is transferred to a country or territory outside the UK, this is done in accordance with data protection law and subject to appropriate safeguards, such as adequacy regulations or standard contractual clauses.

EdTech Platforms and Artificial Intelligence (AI)

The College uses educational technology (EdTech) platforms, including AI-enabled and adaptive learning tools, to support teaching, learning, assessment, and student progress.

Where these tools are used, the College ensures that student data is minimised and, wherever possible, anonymised or pseudonymised, so that students are not directly identifiable within AI systems. Any personal data that is processed remains subject to UK GDPR and the Data Protection Act 2018.

The College ensures that:

- Only the minimum necessary personal data is shared
- Data is used solely for educational purposes
- Student data is not used for marketing, advertising, or commercial profiling
- Student data is not used to train public or open-access AI models

Access to data is strictly controlled, and appropriate contractual, technical, and organisational safeguards are in place. Security arrangements with suppliers are reviewed regularly.

In the unlikely event of a data breach, the College will act promptly in line with its legal obligations.

Parents' and Pupils' Rights

Individuals have the right to make a Subject Access Request (SAR) to access personal data held about them. Parents may make requests on behalf of their child where the child is not considered mature enough to exercise their own rights.

If a request is made, we will:

- Confirm whether we hold the data
- Explain why we process it and how long it is retained
- Explain where the data came from
- Explain who it has been shared with
- Explain whether automated decision-making is used
- Provide a copy of the data in an intelligible format

Parents also have a statutory right of access to their child's educational record via the secure parental portal.

Other Rights

Under data protection law, individuals also have the right to:

- Object to processing where it causes damage or distress
- Prevent data being used for direct marketing
- Object to automated decision-making
- Request correction, deletion, or restriction of processing in certain circumstances
- Claim compensation for damages caused by data protection breaches

Requests should be made to the Data Protection Officer.

Complaints

If you have concerns about how we use personal data, please contact the Data Protection Officer in the first instance.

You may also complain to the Information Commissioner's Office (ICO):

- <https://ico.org.uk/concerns/>
- 0303 123 1113
- Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact Us

If you have any questions about this privacy notice or wish to exercise your rights, please contact:

Hussaina Choudhury
Data Protection Officer

dpo@davidgamecollege.com

Last reviewed: September 2025

Next review: September 2026