

STUDENT PRIVACY POLICY

This document applies to the whole college inclusive of boarding.

1. Purpose of this Policy

David Game College (“the College”) is committed to protecting the personal data and privacy of its students. This policy explains how the College collects, uses, stores, shares, and protects student personal data, and outlines students’ rights under data protection law.

This policy applies to all students, including day and boarding students, and should be read alongside the College’s:

- Safeguarding (Child Protection) Policy
- ICT Acceptable Use Policy
- Behaviour Policy
- Records Retention Policy
- Parents’ Privacy Policy

2. Legal Framework

This policy is written in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Education (Independent School Standards) Regulations
- Keeping Children Safe in Education (KCSIE)

David Game College is the data controller for student personal data.

3. Data Controller and Data Protection Officer

Data Controller:

David Game College
31 Jewry Street, London, EC3N 2ET

Data Protection Officer (DPO):

Hussaina Choudhury
Email: dpo@davidgamecollege.com

The DPO oversees compliance with data protection law and acts as a point of contact for students and parents.

4. Personal Data Collected

The College may collect and process personal data relating to students, including but not limited to:

- Name, date of birth, contact details, student ID
- Emergency contact details
- Academic records, assessments, reports, and examination results
- Attendance, punctuality, and timetable data
- Behaviour, pastoral, and safeguarding records
- Medical and wellbeing information
- Special educational needs or learning support information
- Visa and immigration data (where applicable)

- Photographs and video (e.g. ID cards, College activities)
- CCTV images captured on College premises (retained for a limited period)
- Data processed via approved educational technology (EdTech) platforms

Some data is classed as special category data and is handled with additional safeguards.

5. Purposes for Processing Student Data

The College processes student personal data to:

- Provide education and academic support
- Monitor progress, attainment, and attendance
- Provide pastoral care, boarding support, and safeguarding
- Protect student welfare and safety
- Administer examinations, qualifications, and reports
- Meet legal, regulatory, safeguarding, and immigration obligations
- Communicate with students and parents/guardians
- Maintain campus security and health and safety
- Improve the quality and effectiveness of College services

6. Lawful Bases for Processing

Student personal data is processed on one or more of the following lawful bases:

- Legal obligation (e.g. safeguarding, education, immigration)
- Public task (education and student welfare)
- Contract (provision of education and boarding services)
- Vital interests (medical or safeguarding emergencies)
- Consent, where appropriate (e.g. certain photographs or marketing)

The College does not rely on consent where another lawful basis applies. Where consent is used, it may be withdrawn.

7. Data Sharing

The College may share student data where lawful and necessary with:

- Parents or guardians
- Local authorities and safeguarding agencies
- Examination boards and awarding bodies
- The Department for Education
- Regulators and inspectors (including ISI)
- Health, social care, and emergency services
- Approved service providers and IT suppliers
- Police, courts, or other authorities where required by law

Data is shared on a need-to-know basis and in line with data protection law.

8. Educational Technology (EdTech) and AI

The College uses approved digital learning platforms, including AI-enabled tools, to support teaching and assessment.

The College ensures that:

- Only minimum necessary data is processed
- Student data is anonymised or pseudonymised where possible
- Student data is not used for marketing, profiling, or advertising
- Student data is not used to train public or open-access AI models
- Appropriate contractual, technical, and organisational safeguards are in place

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

All EdTech and AI use complies with UK GDPR and the Data Protection Act 2018.

9. Data Security and Retention

The College takes appropriate technical and organisational measures to protect student data against loss, misuse, or unauthorised access.

Personal data is retained:

- While a student is enrolled at the College; and
- After a student leaves, where required by law or regulation

Retention periods are set out in the College's Records Retention Policy.

10. Student Rights

Students have rights under data protection law, including the right to:

- Access personal data held about them (Subject Access Request)
- Request correction of inaccurate data
- Request deletion or restriction of processing in certain circumstances
- Object to certain types of processing
- Object to automated decision-making

For students under 16, parents usually exercise these rights on their behalf. Students aged 16 and over can normally exercise their rights independently.

11. Complaints and Concerns

Students who have concerns about how their personal data is used should contact the Data Protection Officer in the first instance.

Students also have the right to complain to the Information Commissioner's Office (ICO).

12. Policy Review

This policy is reviewed annually or sooner if required by changes in law or guidance.

Last reviewed: September 2025

Next review: September 2026