KNELLER HALL
SCHOOL

Data Protection Policy

Kneller Hall School collects and uses personal and sensitive information (referred to in the Data Protection Act 2018 as 'personal data') about its current, prospective and former pupils and their parents or guardians, its current, prospective and former staff, its suppliers and contractors, and other individuals connected to the school, as part of its everyday operations. This may include visiting music or sports teachers, contractors, agencies or self-employed individuals contracted by the school to provide a service.

This personal data is gathered in order to enable the provision of education and other associated functions. In addition, the school may be required by law to collect, use and share certain information.

This policy sets out the basis on which the school processes personal data, securely and in accordance with the General Data Protection Regulation (GDPR) 2018, the Data Protection Act (DPA) 2018, and other related legislation.

This policy applies to all personal information however it is collected, used, recorded, stored and disposed of, both on paper or electronic.

The School as Data Controller

Radnor House Twickenham, trading as Kneller Hall School, is registered under the UK Data Protection Act 2018 ("the DPA"), Registration Number ZA085995. It is the specific policy of Kneller Hall School to:

- take all appropriate and reasonable steps to ensure the rights of Kneller Hall School pupils, parents and guardians, staff, suppliers, contractors and governors ("Data Subjects") with respect to their personal data are protected;
- to take all reasonable steps to ensure that personal data held by Kneller Hall School in relation to a Data Subject is both accurate and secure; and
- to comply with the DPA 2018, GDPR 2018, and other related legislation.

For the purposes of the DPA, Kneller Hall School is the Data Controller of all personal data that is held about the school's data subjects. The members of staff responsible for data protection are the school's Data Protection Lead and the IT Manager. The school is also committed to ensuring that its staff are aware of data protection policies, legal requirements and adequate training is provided to them.

The requirements of this policy are mandatory for all staff employed by the school and any third party contracted to provide services within the school. This policy will be published both externally on the school website, as well as internally.

Kneller Hall School takes its responsibilities as a data controller seriously and is committed to using the personal data it holds in accordance with the law. This policy provides detailed information about how the school processes personal data. If you have questions regarding your personal data or its use, please contact the school Data Protection Lead or IT Manager, by telephone on 020 8891 6264 or, by post to Kneller Hall School, Pope's Villa, Cross Deep, Twickenham, TW1 4QG.

Data Protection Principles

The GDPR states there are six Data Protection Principles that the school needs to follow when collecting, processing and storing individuals' personal data:

1. lawfulness, fairness and transparency;
2. purpose limitation – only collecting personal data for a specific purpose, clearly stating what that purpose is, and only collecting data for as long as necessary to complete that purpose.
3. data minimisation – only processing the personal data that they need to achieve the school's processing purposes;
4. accuracy – 'every reasonable step must be taken' to erase or rectify data that is inaccurate or incomplete;
5. storage limitation - deleting personal data when it is no longer necessary, or lawful, to continue to hold it;
6. integrity and confidentiality – personal data must be 'processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.'

Personal Data Processed by the School

- Personal data processed by the school can take different forms – it may be factual information (such as names, ages and home addresses), expressions of opinion about a data subject, images of or including data subjects or other recorded information which identifies or relates to a living individual.
- Personal data processed by the school includes a data subject's contact details and:
  - for staff and contractors – additional information required for their employment or appointment including images, audio and video recordings;
  - for pupils – admissions, academic, disciplinary and other education related records, information about special educational needs, references, examination scripts and marks, images, audio and video recordings and biometric data;
  - for parents and/or guardians – employment details, family circumstances and financial information.
- The processing of personal data may include obtaining, recording, holding, disclosing, destroying or otherwise using that data. Every school is required, as part of its operation, to process a wide range of personal data.
- Sensitive personal data about an individual processed by the school includes data concerning their sexual life, racial or ethnic origin, religious beliefs, criminal records and proceedings, trade union membership and relevant medical information (including details of a data subject's physical or mental health). Sensitive personal data is processed only where necessary for the provision of education and educational support and ancillary services to a pupil or for a person's employment.
- The school collects the personal data it processes directly from the data subject (or in the case of a pupil, their parents or guardians) and from third parties (for example, referees, previous schools and the Disclosure and Barring Service).

Purposes for which Personal Data may be Processed

Personal data (including sensitive personal data, where appropriate) is processed by the school in accordance with the Data Protection Act for the following purposes:

- **The provision of education** including the registration of prospective pupils and administration of the admissions process; administration of the school curriculum and timetable; administration of pupils' entries to public examinations, reporting upon and publishing the results; providing references for pupils (including after a pupil has left); and preparation of information for inspections by the Independent Schools Inspectorate.
- **The provision of educational support and ancillary services** including the provision of pastoral care, welfare, health care services and maintenance of discipline; provision of careers, work experience and library services; administration of sports fixtures and teams, school trips; the implementation of the school's Acceptable IT Use Agreement.
- **The general administration of the school** including the compilation of pupil records; the administration of

invoices, fees and accounts; the management of the school's property; the management of security and safety arrangements; the administration and implementation of the school's rules and policies for pupils and staff; and other reasonable purposes related to the school's operations (including the use of CCTV).

- **The protection and promotion of the school's legitimate interests and objectives** including the publication of its own websites, its internal communication system and virtual learning environment, the prospectus and other publications; and communicating with the body of current and former pupils and/or their parents or guardians.
- **The administration of its staff, agents and suppliers** including the recruitment of staff/ engagement of contractors (including compliance with DBS procedures); administration of payroll, pensions and sick leave; review and appraisal of staff performance; conduct of any grievance, capability or disciplinary procedures; implementation of the school's Acceptable IT Use Agreement, and the maintenance of appropriate human resources records for current and former staff; and providing references.
- **The fulfilment of the school's contractual and other legal obligations.**

The school will only process personal data for the purpose(s) for which it was originally collected, or for purpose(s) which have subsequently been notified to the data subject. The school will not process it for any other purpose without the data subject's permission, unless it is permitted to do so under the DPA 2018 and GDPR 2018.

Personal data will only be disclosed to those people who need to access the data to process it for the purpose(s) for which it was acquired. The school adopts appropriate security measures to ensure that personal data is kept secure and not processed without proper authority. Data is kept for no longer than is necessary, in line with statutory retention timescales where applicable. If you would like details on retention periods for specific information, please contact the school for further information.

For specific detail about how we collect/process/share personal data, please refer to either the school's Data Privacy Notice (Pupils and Parents) on the school website Kneller Hall School, or the Data Privacy Notice (Employees) on the school's internal system.

Sensitive Personal Data

- The school may, from time to time, be required to process sensitive personal data relating to a pupil, a parent, a legal guardian, education guardian or staff member.
- Sensitive personal data is information as to racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical/mental health or condition, sexual life, criminal offences and sentences imposed.
- Sensitive personal data will generally be processed only where one of the following conditions applies:
  - The Data Subject has given explicit consent; or
  - The information has already been made public by the Data Subject; or
  - There is a medical or statutory requirement to process the data, for example, a statutory requirement to safeguard and promote the welfare of the Data Subject or any statutory requirement to notify a suspicion of money laundering, or co-operate with the authorities in other ways.
- Such data will not be copied or shared with any third party other than with the express, written permission of the Data Protection Lead. Provision of access will be restricted solely to data which is needed for the individual to fulfil their contract of service with the school properly and to the best of their ability, and does not contravene the terms of this policy, the Data Protection Act 2018 ("the Act") or the Computer Misuse Act.

Third Parties with whom the School may need to Share your Personal Data

- From time to time Kneller Hall School may pass personal data (including sensitive personal data where appropriate) to third parties, including local authorities, other public authorities, independent school bodies such as the Independent Schools Inspectorate and the Independent Schools Council, health professionals

and the school's professional advisers, and other contractors appointed to process data on behalf of the school:

- To enable the relevant authorities to monitor the school's performance;
- To compile statistical information (normally used on an anonymous basis);
- To secure funding for the school (and, where relevant, on behalf of individual pupils);
- To safeguard pupils' welfare and provide appropriate pastoral (and, where relevant, medical and dental) care for pupils;
- Where specifically requested by pupils and/or their parents or guardians;
- Where necessary in connection with learning and co-curricular activities undertaken by pupils, for example to those who provide our virtual learning environment, and/or run the educational apps that may be used to support our delivery of the curriculum;
- To enable pupils to take part in national and other assessments and to monitor pupils' progress and educational needs;
- To obtain appropriate professional advice and insurance for the school;
- Where a reference or other information about a pupil or ex-pupil is requested by another educational establishment or employer to whom they have applied;
- Where otherwise required by law; and
- Otherwise where reasonably necessary for the operation of the school.

- Kneller Hall School may also, unless a Data Subject requests otherwise, share personal data about former pupils with any association, society or club set up to establish or maintain relationships with alumni of the school, who may contact alumni from time to time by post, email, social media and SMS about the school and its activities.
- All these third parties are data controllers in respect of the personal data they receive, and must themselves comply with the DPA.

Data Processing during a Pandemic

Following the experiences of Covid-19, in any future pandemic situations the school will comply with mandated requirements to collect and process new types of information about individuals (pupils, parents, staff, visitors and other family members of all these), as required, following the relevant guidelines.

Rights of Access to Personal Data

- As Data Subjects, under DPA 2018 individuals have a general right to be given access to personal data held about them, unless an exemption applies (see below).
- In most cases, Kneller Hall School is entitled to rely on parental consent to process data relating to pupils unless, in the particular circumstances, it is unreasonable to rely on the parents' consent. This could arise, for example, if there is a conflict of interests between parents and a pupil or if disclosure of information would interfere with a pupil's lawful right to confidentiality.
- Kneller Hall School will only grant a pupil direct access to their personal data if the school reasonably believes that the pupil understands the nature of the request, and that access would not be likely to cause damage or distress to the pupil or other pupils.
- An individual wishing to access their personal data held by Kneller Hall School should put their request in writing to the school, using a Subject Access Request form available from the school office. The school will respond to a request for access to records within one month of receiving the request (or earlier if practicable).
- For these purposes, a request which arrives while the school is closed for holidays will be treated as having been received when the school next re-opens.
- The identity of the requestor must be established before the disclosure of any information, and checks should also be carried out regarding proof of relationship to the child.
- The DPA provides that certain data is exempt from the right of access, including:
  - Information which identifies other individuals.
  - Information which we reasonably believe likely to cause damage or distress.

- Data prepared solely or mainly to request or give legal advice.
- Examination scripts written by a pupil.
- Data that does not concern a living individual.
- Data that is not part of a manual or electronic filing system.
- Data that may be evidence in criminal proceedings.
- (In some cases) documents protected by copyright.

- Kneller Hall School will also treat as confidential any reference in the school's possession which has been prepared or given to UCAS, and any reference for current or prospective education, training or employment of a pupil or staff member.
- Kneller Hall School acknowledges that an individual may have a right of access to a reference which the school receives about them from another source. Such reference will only be disclosed, however, if:
  - Disclosure will not identify the source of the reference; or
  - The referee has given consent; or
  - Disclosure is reasonable in all the circumstances.

Publication of Personal Data

Kneller Hall School will, from time to time, make use of personal data relating to pupils, their parents or guardians in the following ways:

- In a Kneller Hall School prospectus, on a Kneller Hall School website/online portal/social media or in other promotional literature or materials;
- As an image (photo or video) - Kneller Hall School will not, however, publish a portrait-style photograph or the pupil's name with the image identifying the pupil without the express agreement of a parent/guardian.
- In a register of current or former pupils or any necessary list of pupils representing the school, as a member of a team or on a school trip.
- To give information relating to the fundraising activities of the school and initiatives considered beneficial to members of the school community.
- To maintain contact with former members of the school, and to inform them of events and activities.
- The rights under data protection legislation belong to the individual to whom the data relates. However, the school will often rely on parental consent to process personal data relating to pupils (if consent is required) unless, given the nature of the processing in question, and the pupil's age and understanding, it is more appropriate to rely on 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.
- A parent, or a pupil with sufficient maturity and understanding, who wishes to limit or object to a pupil's image or data being used in the school's promotional material, in any of these ways, should notify the Director of Marketing in writing.

Responsibilities and Obligations of Staff Members and Governors of Kneller Hall School

- Full-time and part-time employees of Kneller Hall School have access to Kneller Hall School personal data; visiting music or sports teachers, contractors, agencies or self-employed individuals do not.
- All staff members and Governors of Kneller Hall School have a responsibility to ensure that they process any data in relation to a Data Subject's files in accordance with this Data Protection Policy, and in particular to ensure that it is adequate, relevant and not excessive, and also accurate and up-to-date. Individuals should notify the school of any significant changes to important information, such as contact details, that the school holds about them.
- Staff members must also not pass any home contact details (staff, pupil or parent) to other parties, without the consent of the Data Subject, or parent/guardian of the Data Subject as applicable.
- All staff members and Governors must ensure that any data they need to access is kept secure, both while stored or in transit.

Third Party Data Processors

- Kneller Hall School may appoint individuals not directly employed by the school to act on their behalf as Data Processors. This may include, but is not limited to, individuals, companies and organisations supplying, installing and/or maintaining computing and IT systems and infrastructure.
- In these cases, the levels of access, security and processing will be specified by Kneller Hall School as part of the contract and personal data cannot be used outside these terms.
- Data moved via third party web/cloud-based services will be encrypted.
- Data that is the subject of this policy should not be stored outside Kneller Hall School IT systems unless express written authority has been given by the school. We ensure that any third parties who are hosting systems on behalf of Kneller Hall School, including those in the cloud such as Evolve, SchooliP, My Maths, etc., are fully registered with the ICO and follow all the necessary requirements of the DPA and GDPR.

Staff Photographs

- Staff photographs will be used for security purposes internally within the Kneller Hall School organisation, as well as for promotional purposes.
- Any staff member who wishes to limit their image being used in Kneller Hall School promotional material should notify the school in writing.

Accuracy of Personal Data Held by Kneller Hall School

- Kneller Hall School will do all that is reasonable to ensure that personal data held in relation to an individual is accurate.
- Individuals must notify the Data Protection Lead of any changes to information held about them.
- A Data Subject has the right to request that inaccurate information about them is erased or corrected.
- If an individual believes that the school has not complied with this policy or has acted otherwise than in accordance with the Act, they should notify the school.

Signed:



Amy Cavilla
Principal

September 2026

Appendix 1 - Closed Circuit Television (CCTV)

CCTV - Introduction

- Kneller Hall School has in place a closed circuit television ("CCTV") system to assist in the prevention and detection of crime, and to protect school premises and property therein.
- Thirteen CCTV cameras are located on the outside of the school, and a further seventeen are located across the Learning Resource Centre, the IT suites, the Media Suite, the Art area, several positions in the lower ground floor areas/corridors, and at the entrance to the Grotto.
- CCTV digital images that show a recognisable person are personal data and are covered by the Data Protection Act 2018.
- This document sets out the accepted use and management of the CCTV system and images to ensure the school complies with the DPA, Human Rights Act 1998 (HRA) and other legislation.
- This document has been produced in line with the Information Commissioner's CCTV Code of Practice and the Home Office Surveillance Camera Code of Practice.

Purpose of CCTV

- The school has installed a CCTV system to:
  - Deter crime.
  - Assist in prevention and detection of crime or damage to premises and property therein.
  - Assist with the identification, apprehension and prosecution of offenders.
  - Monitor security of campus buildings.
- The system will be provided and operated in a way that is consistent with an individual's right to privacy.
- The system will not be used to:
  - Provide images to the World Wide Web.
  - Record sound.
  - Disclose to the media.

Owner

- The CCTV surveillance system is owned by Kneller Hall School
- The Director of Operations is responsible for the day-to-day operation of the system and ensuring compliance with this policy.
- Contact details: Director of Operations, Kneller Hall School, 020 8891 6264

Overview of System

- The CCTV system consists of thirty cameras.
- The CCTV system runs twenty-four hours a day, seven days a week.
- Recordings are automatically deleted after twenty-eight days.
- The CCTV system is managed by school staff and contractors acting on the school's behalf.
- The CCTV system comprises fixed position cameras, monitors, digital recorders and public information signs.
- CCTV cameras are located at strategic points on site externally, principally at the entrance and exit points of the buildings. All cameras are prevented from focusing on the frontages or rear areas of private accommodation. Internally, CCTV cameras are present in the Learning Resource Centre, the IT suites, the Media Suite, the Art area, several positions in the lower ground floor areas/corridors, and at the entrance to the Grotto.
- CCTV signs are prominently placed at strategic points and at entrance and exit points of the site to inform staff, pupils, visitors and members of the public that a CCTV installation is in use.
- Although every effort has been made to ensure maximum effectiveness of the CCTV system, it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.
- The CCTV system is serviced annually, and cameras are checked regularly to ensure that they continue to provide clear images.

Access to CCTV Images

- Access to images will be restricted to those staff who need to have access in accordance with the purposes of

the system.

- Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following:
  - Police and other law enforcement agencies where the images recorded could assist in a specific criminal enquiry and / or the prevention of terrorism and disorder.
  - Prosecution agencies.
- People whose images have been recorded and retained (unless disclosure to the individual would prejudice criminal enquiries).
- Images that have been recorded may be viewed on site by the individual whose image has been captured and/or a uniformed police officer when responding to routine incidents which occurred on the same day. No copies may be taken off site.

Individual Access Rights

- The Act gives individuals the right to access personal information about themselves, including CCTV images.
- All requests for access to a copy of CCTV footage by individuals should be made in writing to the school's Data Protection Lead, using a Subject Access Request form available from the school office. The Data Protection Lead will liaise with the Director of Operations and relevant security staff to determine whether disclosure of the image will reveal third party information.
- Requests for access to CCTV images must include:
  - The date and time the images were recorded.
  - Information to identify the individual, if necessary.
  - The location of the CCTV camera.
  - Proof of Identity.
- The school will respond promptly, at the latest within thirty calendar days of receiving the request, if sufficient information is provided to identify the images requested.
- If the school cannot comply with the request, the reasons will be documented.
- The requester will be advised of these in writing, where possible.

Access to CCTV Images by Third Parties

- Unlike Data Subjects, third parties who wish to have a copy of CCTV images (i.e. images not of the person making the request) do not have a right of access to images under the DPA, and care must be taken when complying with such requests to ensure that neither the DPA, HRA or the CCTV Policy are breached. As noted above, requests from third parties will only be granted if the requestor falls within the following categories:
  - Law enforcement agencies (where the images recorded would assist in a specific criminal enquiry)
  - Prosecution agencies
  - Appropriate members of school staff (such as Human Resources) in the course of staff or student disciplinary proceedings (including prospective proceedings) to ensure compliance with the school's regulations and policies.
- All third party requests for access to a copy of CCTV footage by third parties should be made in writing to the school's Data Protection Lead, who will liaise with the Director of Operations and relevant security staff to determine whether disclosure of the image will reveal third party information.

Retention and Disposal

- Unless required for evidential purposes or the investigation of crime or otherwise required by law, recorded images will be retained for no longer than twenty-eight days from the date of recording.
- At the end of their useful life, all images on discs will be erased and securely disposed of as confidential waste. All still photographs and hard copy prints also will be securely disposed of as confidential waste.

- **Complaints**
- Complaints regarding the CCTV system and its operation must be made in writing to the Director of Operations.