GARDENER SCHOOLS GROUP LTD

Ravenscourt Park Preparatory School and Kew Green Preparatory School

Privacy Notice

Data Controller	Gardener Schools Group Ltd
Applies To	Ravenscourt Park Preparatory School Kew Green Preparatory School
IT Manager	Hitesh Bhojani
Contact	data@gardenerschools.com
Last Updated	July 2026
Legislation	UK GDPR | Data Protection Act 2018 | Data (Use and Access) Act 2025

1. Who We Are

This Privacy Notice covers two schools that operate under the Gardener Schools Group Ltd brand: Ravenscourt Park Preparatory School and Kew Green Preparatory School. Both schools share the same data controller (Gardener Schools Group Ltd), the same data protection arrangements, and this single Privacy Notice. Where this notice refers to "the School" it means either or both schools as the context requires.

Ravenscourt Park Preparatory School and Kew Green Preparatory School (referred to in this notice as "the School") are part of Gardener Schools Group Ltd and are located in London. For the purposes of this Privacy Notice and relevant data protection legislation, the data controller for these schools is Gardener Schools Group Ltd.

All data protection enquiries should be directed to:

Name	Hitesh Bhojani
Role	IT Manager
Email	data@gardenerschools.com

2. What This Privacy Notice Is For

This Privacy Notice explains how Ravenscourt Park Preparatory School and Kew Green Preparatory School collect, use, store and share personal data about individuals including current, prospective and former pupils, their parents and carers (referred to as parents throughout), staff, alumni and donors.

It is provided in accordance with Articles 13 and 14 of UK GDPR and reflects the requirements of UK GDPR, the Data Protection Act 2018, the Data (Use and Access) Act 2025 (DUAA), and Keeping Children Safe in Education 2026 (KCSIE 2026, in force from 1 September 2026). It was last updated in July 2026.

This notice applies alongside our Data Protection Policy, Acceptable Use Policy, CCTV Policy, Safeguarding Policy and Retention of Records Policy.

3. Record of Processing Activities and Impact Assessments

The School maintains a Record of Processing Activities (ROPA) documenting all categories of personal data processing carried out on behalf of Gardener Schools Group Ltd as data controller.

Where we introduce a new system, tool or processing activity that is likely to result in a high risk to individuals, for example adopting a new platform, implementing AI tools, or making significant changes to monitoring arrangements, we will carry out a Data Protection Impact Assessment (DPIA) before the processing begins.

4. Why We Process Personal Data

We process personal data to carry out our ordinary duties to pupils, parents and staff. Some processing is required by law. Other processing is in our legitimate interests or the legitimate interests of the school community, provided those interests are not outweighed by the impact on individuals.

Our legitimate interests include:

- Confirming the identity of prospective pupils and parents, and carrying out credit, identity and source of funds checks
- Providing education services including pastoral care, extra-curricular activities, careers support and remote learning
- Monitoring pupils' progress, educational needs and wellbeing, and reporting to parents
- Organising and managing school events, trips, meetings and social engagements
- Maintaining relationships with alumni and the wider school community, including fundraising and marketing activity
- Donor due diligence, including verifying the identity and background of prospective donors
- Management planning, research and statistical analysis
- Enabling relevant authorities to monitor performance and intervene where appropriate
- Exchanging information and references with other schools and prospective employers of former pupils

- Enabling pupils to take part in national assessments and publishing results of public examinations
- Safeguarding pupils' health and welfare in accordance with KCSIE 2026, including appropriate responses to online harms, AI-generated content and deepfake imagery
- Monitoring use of the School's IT and communications systems in accordance with our Acceptable Use Policy
- Using photographic images of pupils in school publications, on the school website and on social media in accordance with our images policy
- Security purposes, including CCTV, in accordance with the School's CCTV policy
- Prevention and detection of crime, and assisting with investigations by the police and other authorities
- Regulatory record keeping in respect of immigration requirements and visa sponsorship
- Carrying out or cooperating with complaints, disciplinary or investigation processes
- Promoting the School to prospective parents and pupils
- Obtaining appropriate professional advice and insurance

5. Special Category and Sensitive Data

On occasion we process special category personal data (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information. We only do so where we have both a lawful basis and an additional condition under UK GDPR or the Data Protection Act 2018, including:

- Safeguarding pupils' welfare and providing appropriate pastoral and medical care, including sharing health information in emergencies, with caterers, on school trips, or with social services and the police where required
- Complying with public health requirements
- Making reasonable adjustments for pupils with disabilities or special educational needs
- Carrying out complaints, disciplinary or investigation processes that involve health, SEND or safeguarding elements
- Carrying out DBS checks, including enhanced DBS checks for volunteers in regulated activity as required by KCSIE 2026, and complying with legal obligations relating to child protection, diversity monitoring, health and safety, and immigration compliance

6. Our Lawful Basis for Processing

The table below sets out the lawful bases we rely on under UK GDPR, as amended by the Data (Use and Access) Act 2025 (in force from 5 February 2026).

Lawful Basis	When We Use It
Legal Obligation	Safeguarding and KCSIE 2026 duties, DBS checks, HMRC reporting, immigration compliance, public health requirements
Contractual Necessity	Fulfilling the parent contract, processing fee payments, staff employment contracts

Legitimate Interests	Pupil progress monitoring, alumni relations, school security, IT monitoring, fraud prevention. A Legitimate Interests Assessment (LIA) is documented for each reliance on this basis.
Recognised Legitimate Interests (DUAA 2025)	Sharing data with police or public authorities for crime prevention or safeguarding of vulnerable individuals. Under Article 6(1)(ea) UK GDPR no balancing test is required. The right to object still applies.
Consent	Certain uses of pupil images and some fundraising or marketing communications. Consent may be withdrawn at any time.
Vital Interests	Medical emergencies involving pupils or staff
Public Task	Educational functions exercised in the public interest

7. Types of Personal Data We Collect

7.1 Pupils and Parents

- Names, addresses, telephone numbers and email addresses
- Academic records, attendance, admissions information, examination scripts and marks
- Safeguarding and pastoral files
- Health and medical information, SEND records and family circumstances
- Nationality and immigration status, including copies of passport information
- Financial information, including fee payment details and source of funds
- References from and to other schools, and information from professionals working with pupils
- Correspondence with and concerning pupils and parents
- Photographic images and CCTV footage

7.2 Staff

- HR records, payroll details and performance information
- DBS and pre-employment check records, including the Single Central Record (SCR). The SCR is a statutory document and is typically the first record requested at inspection.
- Absence, disciplinary and grievance records
- Training records and emergency contact details
- Complaints records, retained in accordance with the School's complaints procedure and as required by Part 7 of the Independent School Standards

7.3 Alumni and Donors

- Contact details and occupation or professional information
- Donation history and gift aid declarations
- Due diligence and source of funds information

7.4 Visitors

- Car registration details for visitors using school car parking facilities

8. How We Collect Personal Data

- Directly from you, via admission forms, parent contracts, correspondence or in the ordinary course of communication
- From your child, for example through written work, assessments or pastoral conversations
- From third parties, such as previous schools, other professionals or authorities working with your child, or third-party service providers carrying out identity or credit checks
- From publicly available sources, for example for alumni relations or donor due diligence

9. Who We Share Personal Data With

Personal data generally remains within the School and the Gardener Schools Group. Where we share data with third parties, we do so only where there is a lawful basis and appropriate safeguards are in place, including:

- Other schools and settings within the Gardener Schools Group
- Examination boards and awarding bodies
- Professional advisers including solicitors, insurers, accountants and PR advisers
- Visiting staff and contractors such as music teachers, on a need-to-know basis
- Stage 3 complaints panels, including independent panel members
- Government and regulatory authorities including HMRC, DfE, Home Office, ICO, the Teaching Regulation Agency and the Independent Schools Inspectorate
- Children's services including CAFCASS, local authorities, CAMHS, the police and NHS or public health bodies. Where we share data to assist with crime prevention or the safeguarding of vulnerable individuals, we may rely on the Recognised Legitimate Interests basis under the DUAA 2025.
- Other schools and educational institutions for the purposes of references, admissions transfers and safeguarding handovers
- Third parties in connection with a potential sale, merger or restructuring of the Group or any of its schools

All third parties who process data on our behalf are subject to a written data processing agreement in accordance with Article 28 UK GDPR.

10. Safeguarding and Sensitive Data

10.1 Medical and Health Data

Health and medical information is processed to comply with our statutory duties and keep pupils safe. Access is restricted to authorised staff on a need-to-know basis. Wider sharing

may occur where necessary, for example for school trips, catering or emergency medical care.

10.2 Safeguarding Data

We are required by law and by KCSIE 2026 (in force from 1 September 2026) to record and in some cases report incidents and concerns even where unproven, if they meet a threshold of seriousness or regularity. KCSIE 2026 includes updated requirements relating to volunteer DBS checks and to AI-generated content and deepfake imagery as safeguarding harms. Our safeguarding arrangements reflect these updated requirements.

When a pupil leaves the School, their child protection file is transferred promptly to the receiving school. The Designated Safeguarding Lead (DSL) determines what information is material to share. We retain a copy in accordance with our retention schedule.

11. Subject Access Requests

You have the right to request a copy of the personal data we hold about you. Following changes introduced by the DUAA 2025 (in force from 5 February 2026):

- The one-month response period does not begin until we have received all information reasonably required to identify the scope of your request (the stop-the-clock provision under Article 12A UK GDPR)
- We may extend the response period by up to two further months for complex or numerous requests and will notify you before the end of the first month
- Requests that are manifestly unfounded or excessive may be refused or subject to a reasonable fee

Please submit all subject access requests in writing to data@gardenerschools.com, including your full name and as much detail as possible about the data you are seeking.

12. Your Rights

Right	What It Means
Right of Access	Request a copy of the personal data we hold about you (see Section 11 for updated SAR rules).
Right to Rectification	Ask us to correct inaccurate data. We are not required to delete professional opinions or notes purely because you disagree with them.
Right to Erasure	Ask us to delete your data. We may have lawful reasons to retain it, for example safeguarding obligations.
Right to Restriction	Ask us to limit use of your data while accuracy or legitimate interests are in dispute.
Right to Portability	Where processing is based on consent or contract and carried out automatically, request your data in a portable format.

Right to Object	Object to processing based on legitimate interests, including direct marketing.
Right to Withdraw Consent	Withdraw consent at any time without affecting the lawfulness of prior processing.
Rights re Automated Decisions	Where a decision with significant effects is made solely by automated means, you may request human review, make representations, and contest the outcome (Articles 22A to 22D UK GDPR).

13. Pupils and Parental Rights

13.1 Pupils

Pupils can make subject access requests for their own personal data provided they have sufficient maturity to understand the request. Pupils aged approximately 12 or 13 and above are generally considered to have this maturity. Younger pupils may act through a parent or guardian.

13.2 Parents

Parents with parental responsibility may make requests on behalf of younger pupils. For older pupils, evidence of the child's authority may be required. Requests not in the child's best interests may be refused. Where parents are separated, we will generally provide the same information to each person with parental responsibility, taking into account the wishes of the child, any court orders and relevant pastoral considerations.

13.3 Whose Rights?

The rights under data protection law belong to the individual to whom the data relates. In the case of pupils, this means the child, not the parent. In general, the School will assume that pupils' consent is not required for ordinary disclosure of their personal data to their parents, for example for keeping parents informed about a pupil's activities, progress and behaviour, and in the interests of the pupil's welfare.

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, the School may be under an obligation to maintain that confidentiality. The School will depart from this only where, in its opinion, there is good reason to do so, for example where disclosure is in the best interests of the pupil or other pupils, or is required by law.

For older pupils, the School may in some circumstances seek the pupil's own consent to certain uses of their data alongside or instead of parental consent, depending on the nature of the processing and the pupil's age and understanding.

14. Remote Learning and Live Events

Where the School provides remote learning or streams live events, personal data may be processed in connection with those activities. In particular:

- Where online sessions are recorded, we will be clear about the purpose of any recording (for example safeguarding or educational catch-up) and how long recordings are retained
- Where third-party platforms are used for remote learning or streaming, relevant privacy information will be provided at or before the point of sign-up or access
- Where a live stream of a school event is made available, it will be via a secure or password-protected link wherever practicable, and access will be time-limited

Parents and pupils will be informed of any recording or streaming activity in advance. The School's images policy and Acceptable Use Policy apply to all remote and online activity.

15. How Long We Keep Personal Data

We retain personal data only for as long as is necessary for the purpose for which it was collected and in accordance with legal requirements.

Photographic imagery of pupils and school events may be held across the school website, social media and marketing archives spanning a number of years. We are committed to conducting a review of legacy photographic archives within 12 months of the date of this notice, with a view to implementing a manageable and documented disposal process for images that fall outside our retention periods.

Category	Retention Period
Pupil and parent records (general)	Until the pupil's 25th birthday (in line with DfE guidance), or 7 years after departure for pupils who leave aged 18
Safeguarding and child protection files	As required by statutory guidance, typically until age 25 or beyond
Staff HR records	6 years after employment ends, or as required by law
Financial and fee records	7 years (HMRC requirement)
Complaints records	As required by the School's complaints procedure and the Independent School Standards (Part 7)
CCTV footage	31 days, unless retained for an active investigation or incident
Network monitoring logs	12 months
Examination records	Per examination board requirements
Suppression records	Indefinitely, to ensure we honour your request not to be contacted

16. Keeping in Touch and Fundraising

We may use contact details of parents, alumni and community members to send updates, newsletters, event invitations and fundraising communications. Unless you object, we may

also share your details with organisations supporting the school community such as alumni associations, and collect publicly available information to inform fundraising.

You can object to any of these uses at any time by writing to data@gardenerschools.com. A suppression record will be retained to ensure you are not contacted again.

17. Data Protection Complaints

Under section 164A of the Data Protection Act 2018, inserted by the DUAA 2025 and in force from 19 June 2026, we operate a formal data protection complaints procedure.

- Contact our IT Manager in the first instance: data@gardenerschools.com
- We will acknowledge your complaint within 30 days of receipt
- We will investigate and respond as soon as reasonably practicable
- If not satisfied, you may use the School's formal complaints procedure

You also have the right to lodge a complaint with the ICO at any time:

ICO Website	www.ico.org.uk
ICO Helpline	0303 123 1113

18. Changes to This Privacy Notice

We may update this Privacy Notice from time to time. Any significant changes affecting your rights will be communicated to you directly as far as reasonably practicable.

Policy Owner	Hitesh Bhojani, IT Manager
Approved By	Directors of Gardener Schools Group Ltd
Last Updated	July 2026
Next Review	July 2027