

Privacy Notice

Applies to Prep, Pre-Prep and EYFS

Reviewed and approved:	Compliance Officer
	May 2025
Next review due:	May 2026



BARDWELL ROAD
OXFORD OX2 6SS
Tel: +44 (0)1865 315400
www.dragonschool.org

This Privacy Notice explains the types of personal data which Dragon School will collect and how the School will process this personal data. Before submitting personal data to the School, please ensure you have fully understood this notice and any other Privacy Notice which may apply to you.

This Policy is for:

- Parents and carers of current registered pupils at the Dragon School
- Parents and carers of prospective pupils at the Dragon School
- Parents and carers of former pupils at the Dragon School
- Governors, colleagues, contractors, volunteers and anyone else working on behalf of the Dragon School;

This Policy should be read in conjunction with:

- Dragon School Parent Contract
- Dragon School Privacy Notice (for children)
- Dragon School Data Protection Policy
- Dragon School Data Retention Policy
- Dragon School Safeguarding Policy
- Any other information that the School provides about a specific use of personal data, e.g. consent forms.

In this document:

- “School” means the Dragon School, Oxford
- “Personal data” and “personal information” means any information that can be used to identify an individual
- “Data controller” means the person or legal entity which determines the purpose for which and the means by which personal data is processed
- “Data processor” means a person or legal entity which processes personal data on behalf of a data controller
- “Data Protection law” includes but is not limited to the EU General Data Protection Regulation and the UK Data Protection Act.

Who we are

The School is governed by a board of trustees, Dragon School Trust Ltd., which is the School’s data controller. The registered address for the company is:

Dragon School Trust Ltd. Bardwell Road Oxford OX2 6SS	Telephone: 01865 315400 Company number (England & Wales) 524331 Charity number 309676
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Enquiries relating to data protection may be emailed to data.protection@dragonschool.org and the School's Compliance Officer is the first point of contact for requests and enquiries relating to the School's use of personal data.

How and why the School collects and uses personal information

The table below sets out categories of personal information that the School collects and how this may be shared (although the second column is not exhaustive).

Information relating to the safeguarding and welfare of pupils	<p>The safety and welfare of our pupils is our first priority.</p> <p>The School records and monitors information relating to pupils' attendance, activities, as well as information relating to personal and social development that enables the School to provide appropriate pastoral care. Certain information may be provided to third parties including regulators, local authority children's services, the courts, and the police. If a pupil leaves the School, the School will share information with that new school relating to safeguarding and welfare.</p>
Information relating to pupils' learning	<p>The School regularly assesses and monitors pupils' academic progress, and this information is recorded by departments. Some assessments (standardised cognitive ability tests) are shared with pupils' potential future senior schools to support a pupil's application or entrance process.</p>
Information relating to pupils with Special Educational Needs or Disability (SEND)	<p>Information relating to a pupil's special educational need or disability may be shared with relevant professional agencies in order to make assessments and identify appropriate provisions and adjustments that should be made to support their learning.</p>
To manage our school effectively	<p>We use the personal information we collect to support the day-to-day management of our schools, such as keeping class registers and organising, monitoring and sharing information about pupil activities.</p> <p>This includes but is not limited to:</p> <ul style="list-style-type: none"> • An application for a place at our School may be made on behalf of a prospective pupil, ordinarily by a person with parental responsibility. We ask applicants to provide personal information about themselves and the child they are applying for. This includes name, date of birth, contact details, address and current school. We ask for this information so that we can progress the application and follow our admissions policy to ensure that the child will thrive in our School. • We also ask for information on nationality, ethnicity, languages spoken and any individual needs a student might have to ensure we make effective provision for them, and also to provide statistical information. When we offer and this is accepted, we will ask for further information, including details of medical history and dietary needs. This is so that we can provide appropriate health care to our students. We may share this information with authorised third parties if we believe this is necessary and in a pupil's best interest, for example in the event of a medical emergency. • The details of those who will pay any fees due, and their bank account details. • We may take photographs of pupils to identify them in our school records. We may also take photographs or record video during lessons, presentations or school trips where this supports delivery of our school curriculum ("internal use").

	<p>We may take photographs or video footage of students and use these in school publications, for example a school magazine, prospectus or on the school's social media in order to celebrate Pupil and School achievements and promote the School and its initiatives (e.g. outreach events) ("external use").</p> <p>There may be occasions where the School requests specific consent for the use of an image or video recording of a Pupil and depending upon the age and understanding of the Pupil, we may ask for that consent from the Pupil, a parent, or both.</p> <p>Parents and/or pupils who do not wish for their images to be processed for external use should inform the Admissions Office at the point of signing the Parent Contract or, if after the signing of the Parent Contract, by email data.protection@dragonschool.org.</p> <ul style="list-style-type: none"> • We may use CCTV for safety and security reasons. CCTV is not used in private areas such as changing rooms or toilets and is not retained for longer than we consider necessary to fulfil this purpose.
To understand and develop our community	<p>We may use personal information in order to better understand our community and ensure that we meet its needs. This may involve sharing your personal information with third party providers for analysis or to help us adhere to specific regulatory requirements (e.g. relating to site and curriculum accessibility, anti-money laundering laws or Charity Commission regulations).</p>
For the employment and management of our colleagues	<p>We record and process colleagues' personal information in order to fulfil our contract of employment with our colleagues and to monitor our employment policies. This information includes (but is not limited to) their name, address, date of birth, next of kin and emergency contact details, applications for employment, academic qualifications, registrations with professional bodies, ethnicity, salary information, bank account and pension details, relevant medical history and any individual needs including those relating to disability.</p> <p>We collect, record and process some personal information to comply with our statutory responsibilities. This includes (but is not limited to) information relating to tax, National Insurance, statutory sick pay, statutory maternity and paternity pay, family leave, entitlement to work in the UK, proof of identity, Disclosure and Barring Service checks and criminal convictions.</p> <p>We record information that enables us to support the personal development of our colleagues and to assess their performance. This includes personal development appraisals, performance monitoring, capability, grievance and disciplinary matters, absence and sickness monitoring.</p> <p>Some data is collected directly from prospective or newly appointed colleagues. Other personal data is collected from third parties, such as references from former employers, medical information, or identity checks via an external identity checking service.</p> <p>We invite job applicants and colleagues to provide information about themselves, including ethnicity, faith, sexual orientation and disability. This allows us to monitor the diversity of job applicants and of our workforce. Providing this information is voluntary and colleagues are free to answer 'prefer not to say'. We do not share this personal information with any third parties.</p>

To communicate with our network of alumni	<p>The Dragon School Development Office exists to establish and develop lifelong relationships with and amongst our alumni ('Old Dragons'), current and former parents, former staff, donors and supporters. The School may collect and use contact details for members of these groups to keep them updated on the activities of the School or events. This may include sending updates and newsletters by email or post, or contact by telephone, in accordance with your preferences.</p> <p>Unless an individual objects, and where permitted by law, the School will also:</p> <ul style="list-style-type: none"> • Share personal data about the Dragon Community, as appropriate, with organisations set up to help establish and maintain relationships with the Dragon Community, or to volunteers hosting events, providing those volunteers or organisations have signed relevant confidentiality agreements; • Communicate on School social media platforms (specifically Facebook and LinkedIn) about relevant charitable causes that may be of interest to the Dragon Community; • Collect information from publicly available sources (including online and media reports) about the occupation and activities of Old Dragons, current and former parents, and former staff, to support our communications and alumni relations efforts, and to help target our communications; • Share information with third parties working on our behalf. We will only do this in appropriate circumstances, by secure means, and with the relevant data sharing agreements in place. We do not, and will not, sell your data. <p>Subject to individual permissions, we may publish names as part of guestlists or in our publications. Photographs may be taken at events and stored for use in social media or publications.</p> <p>The amount of data we collect and hold depends on the frequency and nature of your interactions and engagement with us. Data is regularly reviewed and updated or deleted to remain relevant.</p> <p>Any individual has the right to opt-out of communications from the Development Office. All opt-out requests will be honoured and processed as soon as is practicable.</p>
To generate philanthropic income	<p>Personal data may be used to help ensure that our fundraising efforts are conducted efficiently, respectfully and professionally, and as far as possible based on evidence and an understanding of what may interest you. To support our fundraising efforts, the School will:</p> <ul style="list-style-type: none"> • Collect information from publicly available sources (including online and media reports) about the occupation and activities of Old Dragons, current and former parents, and former staff, in order to maximise the School's fundraising potential; • Acknowledge, recognise, and steward your gift, including communicating the impact of your support through written communications and occasional event invitations; • Use publicly available information in order to comply with the acceptance of gifts, and to fulfil our legal responsibilities.

	<p>Subject to individual permissions, we may publish the names of donors in donor listings or donor boards, or create press releases or case studies to be included in publications or on our website.</p> <p>The Dragon School will always act in accordance with fundraising best practice, and is registered with the Fundraising Regulator. Any individual has the right to opt-out of fundraising communications from the Development Office. All opt-out requests will be honoured and processed as soon as is practicable.</p>
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A lot of the information controlled and processed by the School is provided directly by parents, colleagues and pupils (e.g. when completing parent contracts and registration forms; when completing employment contracts; through the generation of school work and day-to-day operations). Some personal information is also supplied to us by third parties including other schools, in colleague references, and from local authorities.

Our legal basis for processing personal information

Legitimate interests	This means that the processing is necessary for legitimate interests pursued by the School, unless this would override your fundamental rights, taking into account your reasonable expectations. We rely on legitimate interests for many of the ways in which we process personal information, including providing educational services to our students and managing our School effectively.
Necessary for a contract	We may need to process personal information in order to perform our obligations under contract, or to gather information prior to entering into a contract. For example, we need your name and contact details so that we can update you on a pupil's progress, so that we can contact you if there is a concern, or so that we can process information about school fees. We also process the personal information of our colleagues as part of our contract of employment with them.
Legal obligation	We are under a duty to comply with a number of legal obligations and we will process personal information in connection with these. Legal obligations can relate to safeguarding, health and safety and statistical returns to the Government. Where necessary we may share personal information with other service providers, such as insurers and professional advisers.
Vital interests	We may process personal information if we believe this is necessary to protect an individual's vital interests. This might include sharing allergy information with third party caterers, or other health information with medical professionals providing treatment.
Consent	If we ask for consent, we will be clear about what we are asking to do with your personal information. Where we are relying on consent to process personal information you may withdraw your consent at any time. Please note that we may need to continue to process personal information under one of the other grounds set out above.

Our legal basis for processing special categories of personal data

Data protection legislation also refers to “special categories of personal data” which is more sensitive personal information needing a higher level of protection. This includes data revealing racial or ethnic origin, trade union membership, and the processing of biometric data, data concerning health or data concerning a natural person’s sex life or sexual orientation. As above, we invite job applicants and colleagues to provide information about themselves, including ethnicity, faith, sexual orientation and disability. This allows us to monitor the diversity of job applicants and of our workforce. Providing this information is voluntary and colleagues are free to answer ‘prefer not to say’. We do not share this personal information with any third parties.

We take extra care when processing special categories of personal data and will only process this type of information when one of the following applies:

Ethnicity Data of Students	We may collect information on the ethnicity of pupils as we are under a statutory obligation to complete an annual school census and return to the Secretary of State for Education.
Data concerning health	<p>We record information on the health of our colleagues where this is necessary to fulfil our obligations under employment law, make adjustments to support them, calculate their entitlement to sick pay or to ensure the safety of students in their care.</p> <p>We may record and process information on the health of our students in the following areas:</p> <ul style="list-style-type: none"> • Safeguarding: it may be necessary for us to record information on the physical or mental health of our students and share this with health or social care professionals in order to ensure our students receive appropriate health or social care treatment. • Pastoral care: we may record information concerning the social, psychological or physical development of our students and this may include information concerning their health, in order to make provision for appropriate health or social care treatment. • Special Educational Needs and Disability (SEND): when we record information on a student’s individual needs this may include information concerning their health. Where we do this it is in order to make provision for appropriate health or social care treatment. • Medical care: we record information on any pre-existing medical issues of our students and any medical episodes they experience at school. This is in order to make provision for appropriate health treatment. In a medical emergency we may share information with other parties, such as ambulance colleagues or a hospital if we believe it is in an individual’s best interests and they are unable to provide this themselves.
Data concerning a person’s sex life or sexual orientation	We may record information on a pupil’s sexual orientation where this is necessary to provide appropriate safeguarding or pastoral care.

Where none of the above conditions apply and we still wish to process special categories of personal data we will ask for consent. If we ask for consent, we will be clear about what we are asking to do with any sensitive personal information, and the person providing consent may withdraw this at any

time. Depending on the nature of the consent we are seeking, and the age and understanding of the child, we may ask our students for their consent, or a parent, or both.

How long do we keep personal information

In line with the law, we keep information for as long as is necessary in order to carry out the services and activities listed above. Further Information on our retention schedule may be found in our Data Retention Policy.

We retain some information after our students have left our schools, for example, student roll, public exam results, and safeguarding information. We may keep some limited information for a longer time if we believe this is appropriate for historical, research or statistical purposes.

Your legal rights

Your right of access	You have the right to ask us for copies of your personal information. There are some exemptions, which means you may not always receive all the information we process. You can read more about this here .
Your right to rectification	You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. You can read more about this here .
Your right to erasure	You have the right to ask us to erase your personal information in certain circumstances. You can read more about this here .
Your right to restriction of processing	You have the right to ask us to restrict the processing of your information in certain circumstances. You can read more about this here .
Your right to object to processing and withdraw consent	You have the right to object to the processing (use) of your personal data in some circumstances. You can read more about this here . You also have the right to withdraw your consent to data processing. You can read more about this here .
Your right to data portability	<p>This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated. You can read more about this right here.</p> <p>If you wish to exercise this right, the first point of contact should be the Compliance Officer.</p>
Your right to complain	You have the right to make a complaint to the Information Commissioners Office which is the regulatory body responsible set up to uphold information rights in the public interest. You can read more about this, including how to make a complaint here .