

PRIVACY NOTICE FOR PARENTS AND PUPILS

I. INTRODUCTION

- 1.1. This privacy notice describes how we collect and use personal information about pupils and parents, in accordance with the UK General Data Protection Regulation (UK GDPR). It is available on the policies page of the school website and can be made available in hard copy, large print or other accessible format if required; such requests can be made to bursar@kcs.org.uk.
- 1.2. Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.
- 1.3. This notice is intended to provide information about how the school will use or 'process' personal data about pupils and parents. It applies alongside any other information the school may provide about a particular use of personal data, for example when collecting data via an online or paper form.

2. WHO COLLECTS THIS INFORMATION

- 2.1. The Corporation of King's College School (the school), which includes King's College School, King's College Junior School and Wimbledon College Preparatory School, is a "data controller" of personal data and gathers and uses certain information about you. This means that we are responsible for deciding how we hold and use personal information about you. The school has notified the Information Commissioner's Office of its processing activities and our ICO registration is Z7413885.
- 2.2. Under data protection legislation, we are required to notify you of the information contained in this privacy notice. This notice does not form part of any contract to provide services and we may update this notice at any time.
- 2.3. It is important that you read this notice, with any other policies mentioned within this privacy notice, so you understand how we are processing your information and the procedures we take to protect your personal data.

3. DATA PROTECTION PRINCIPLES

- 3.1. We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

4. CATEGORIES OF PUPIL AND PARENT INFORMATION WE COLLECT, PROCESS, HOLD AND SHARE

- 4.1. We may collect, store and use the following categories of personal information about you:
 - Personal information such as name, pupil number, date of birth, sex and contact information;
 - Identification documents such as passport or birth certificate;

- Emergency contact and family lifestyle information such as names, relationship, phone numbers, occupations, addresses and email addresses;
- Characteristics (such as ethnicity, language, nationality, and country of birth);
- Immigration status information (eg the right to live and study in the United Kingdom);
- Past, present and prospective pupils' academic, disciplinary, admissions, safeguarding and attendance records, and work, examination scripts and marks;
- Attendance details (such as sessions attended, number of absences and reasons for absence);
- Performance and assessment information;
- Behavioural information (including exclusions);
- Special categories of personal data (including ethnicity, relevant medical information, special educational needs information);
- Information about pupils' physical and mental health and any special needs and about any family circumstances that might affect pupils' welfare;
- Information about the use of our IT, communications and other systems, and other monitoring information;
- Employment details and bank details and other financial information, e.g. about parents (or others) who pay fees to the school;
- Post 16 learning information;
- References given or received by the school about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- Correspondence with and concerning pupils and parents;
- Car details if you use our car parking facilities, including images captured by CCTV;
- Images and recordings of pupils, and occasionally parents, engaging in school activities, and images and recordings captured by the school's CCTV.

5. HOW WE COLLECT THIS INFORMATION

- 5.1. Generally, the school receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via the admission process, a form, or simply in the ordinary course of interaction or communication (such as email).
- 5.2. In some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities working with that individual); or collected from publicly available resources. In some cases other data is added including, but not limited to, information about partners, financial and other data disclosed to us or which we have derived from public records and publicly available sources of information.
- 5.3. Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the UK General Data Protection Regulation, we will inform you whether you are required to provide certain information to us or whether you have a choice in this. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

6. HOW AND WHY WE USE YOUR INFORMATION

- 6.1. We hold pupil and parent data and use it for:
 - Pupil selection (and to confirm the identity of prospective pupils and their parents);

- Providing education services, including musical education, physical education or spiritual development, career services, school trips and co-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Informing decisions such as the funding of the school;
- Assessing performance and to set targets for the school;
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care;
- Taking appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social or public health protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;
- Enabling relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
- Supporting teaching and learning;
- Managing internal policy and procedure;
- Enabling pupils to take part in assessments, to publish the results of examinations and to record pupil achievements;
- Monitoring use of the school's IT and communications systems in accordance with the school's Child Protection and Safeguarding Policy and Acceptable Use Policy;
- Making use of photographic images of pupils in school publications and those of our international partner schools, including on the school website and on social media channels. We may also occasionally share photographs and other media with third parties, for example a local or national newspaper;
- Security purposes, including CCTV in accordance with the school's CCTV Policy;
- Giving and receiving information and references about past, current and prospective pupils (including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend) and to provide references to potential employers of past pupils;
- Providing support to pupils after they leave the school;
- Maintaining relationships with parents, pupils, alumni and the school community, including direct marketing or fundraising activity (for more information on this please see the Privacy Notice for Alumni and External Relations on the website);
- To carry out statistical analysis for diversity purposes;
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care;
- Carrying out credit, identity and source of funds checks, whether with previous schools and/or third-party sources or service providers, including for the purposes of verifying that parents are not subject to (or within the purview of) sanctions;
- Carrying out or cooperating with any school or external complaints, disciplinary or investigation process; and
- Other purposes as reasonably necessary, including to obtain appropriate professional advice and insurance for the school.

7. THE LAWFUL BASES ON WHICH WE USE THIS INFORMATION

7.1. We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Consent: the individual has given clear consent to process their personal data for a specific purpose;
- Contract: the processing is necessary for a contract with the individual;
- Legal obligation: the processing is necessary to comply with legal and regulatory purposes (not including contractual obligations), for example child protection, diversity monitoring, public health, and health and safety;
- Vital interests: the processing is necessary to protect someone's life.
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law;
- Legitimate Interest: the processing is necessary for our legitimate interest as a school, provided those interests are not overridden by your fundamental rights and freedoms; and
- The Education Act 1996: for example the Departmental Censuses 3 times a year.

7.2. We need all the categories of information in the list above primarily to allow us to comply with legal obligations. Please note that we may process information without knowledge or consent, where this is required or permitted by law.

8. SHARING DATA

8.1. We may need to share your data with third parties, including third party service providers where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. These include the following:

- The Department for Education (DfE) - on a statutory basis under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013;
- Appropriate regulatory bodies, such as the Independent Schools Inspectorate, the Charity Commission or the Information Commissioner's Office);
- NHS;
- Welfare services (such as social services and the Local Authority Designated Officer);
- Law enforcement officials such as police, HMRC;
- Individuals or organisations such as sports coaches, visiting music teachers, exam boards and awarding bodies or school trip providers in connection with assessment, learning and co-curricular activities undertaken by pupils;
- Other schools or universities that pupils have attended/will attend;
- Professional advisors such as lawyers, accountants, consultants and the school's Data Protection Officer;
- Support services (including insurance, IT and software providers, information security);
- IT storage providers;
- Others where required by law or where reasonably necessary for the operation of the school.

8.2. The recipient of the information will be required to respect the security of your data and to treat it in accordance with the law.

8.3. We may transfer your personal information outside the UK and the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

9. RETENTION PERIODS

- 9.1. Except as otherwise permitted or required by applicable law or regulation, the school only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.
- 9.2. Typically, the recommendation is that ordinary pupil files are kept for at least 7 years following departure from the school. However, incident reports and safeguarding files will need to be kept much longer in accordance with specific legal requirements.
- 9.3. Once you are no longer a pupil or a parent at the school, we will retain and securely destroy your personal information in accordance with our information and records retention policy which can be found on the school website. A limited and reasonable amount of information will be kept for archiving purposes, for example. Even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

10. KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

- 10.1. If you have chosen to add your contact details to the 'Parent Directory' on the parent portal, those details will be shared with other parents in your child's year group. Your year group representative may also use those details to contact you on behalf of the Friends of King's which uses Classlist for the purposes of informing parents about Friends and school activities, events and news, and establishing and maintaining relationships and communication between parents, the Friends and the school. If you subsequently wish to withdraw your details from the online Parent Directory you can do this at any time but please note that you may also need to contact year group representatives directly if you no longer wish to be included in their communications.
- 10.2. The school may use the contact details of current and former parents and pupils to keep you updated about the activities of the school, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post.
- 10.3. Unless you object, the school may also contact you by post and email in order to promote and raise funds for the school and, where appropriate, other worthy causes. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. Please see the Privacy Notice for Alumni and External Relations on the website for more information.
- 10.4. The Development Office may use the contact details provided by pupils at the time when they leave the school to keep them updated about the activities of the school and inform them of events which may be of interest (e.g. reunions and other school events to which members of the Old King's Club are invited). Please see the Privacy Notice for Alumni and External Relations on the website for more information.
- 10.5. Should you wish to limit or object to any such use, or would like further information about them, please contact the school by email at development@kcs.org.uk or by post to the school address. The school may need nonetheless to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

11. SECURITY

- 11.1.The school keeps information about pupils on computer systems and sometimes on paper. We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. Details of these measures are available in our information security policy.
- 11.2.It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

12. YOUR RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

- 12.1.Under certain circumstances, by law you have the right to:
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
 - Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.
 - Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
 - To object to processing in certain circumstances (for example for direct marketing purposes).
 - To transfer your personal information to another party.
- 12.2.If you want to exercise any of the above rights, please contact the bursar at bursar@kcs.org.uk. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).
- 12.3.Under data protection legislation, parents and pupils have the right to request access to information about them that we hold (commonly known as a 'Subject Access Request'). To make a request for your personal information, contact bursar@kcs.org.uk. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). If you want to request information, please see our *Data protection policy* which sets out the procedure and is available on the school website.

13. RIGHT TO WITHDRAW CONSENT

- 13.1.In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.
- 13.2.To withdraw your consent, please contact . In the case of withdrawing consent for the use of pupil images:
- Parents should do so via the consents page on the parent portal.

- Pupils aged 12 and above should speak to a member of staff, who will refer the request to the bursar.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Both parents and pupils aged 12 and above will be reminded annually to review and, if necessary refresh their consent preferences.

14. CONTACT US

14.1. The Bursar is responsible for data protection within the school. They will deal with any requests or enquiries regarding the school's uses of your personal data and endeavour to ensure that your personal data is processed in compliance with this notice and Data Protection Law. If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, please contact the Bursar via email at bursar@kcs.org.uk. We hope that the bursar can resolve any query you raise about our use of your information in the first instance.

14.2. To help ensure and document UK GDPR compliance the school has appointed Judicium Consulting Limited as the school's Data Protection Officer (DPO). Their contact details are:

Judicium Consulting Limited
Address: 72 Cannon Street, London, EC4N 6AE
Email: dataservices@judicium.com
Web: www.judiciumeducation.co.uk
Telephone: 0345 548 7000 option 1 then option 1 again

14.3. The bursar will work in conjunction with the DPO as appropriate who is responsible for advising on any data protection matters.

14.4. If you believe that the school has not complied with this privacy notice, or has acted otherwise than in accordance with Data Protection Law, you should notify the Bursar in writing. You are also entitled to make a referral to, or lodge a complaint with, the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at <https://ico.org.uk/make-a-complaint> although the ICO does recommend that steps are taken to resolve the matter with the school before involving the regulator.

15. CHANGES TO THIS PRIVACY NOTICE

15.1 We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.