

Privacy Notice

This policy covers EYFS, Prep School & Senior School

Governors' Committee normally reviewing policy	Governing Body
Date policy formally approved by Governors	September 2023
Period of review	1 Year
Last review date	August 2026
Next review date	August 2027

Person responsible for monitoring implementation and effectiveness of the policy	Head
Other relevant policies	General Policies

Kingsley School Bideford is owned and operated by KSI Schools Group Limited, which is the School's Proprietary Body ("the Proprietor").

Any reference in this policy to the Governors or Governing Body means the School's local body of governors, which operates as a local advisory board on behalf of the Proprietor. The local governing body does not constitute the Proprietary Body of the School.

The Proprietor has ultimate responsibility for ensuring that the School meets its statutory and regulatory obligations and for ensuring that this policy is appropriate, effective and implemented in accordance with those requirements.

The Governors provide local oversight and scrutiny on behalf of the Proprietor and undertake appropriate review and monitoring to satisfy themselves that this policy is being implemented effectively. They advise and make recommendations to the Proprietor and the School's leadership as appropriate.

The core principle that guides everything we do is **Putting Students First**.

Privacy Notice: How we use student and parent information

Kingsley School and Kingsley Education Limited are the Data Controllers for the use of personal data in this privacy notice.

The categories of student and parent information that we collect, hold and share include:

- Personal information (such as name, unique student number and address)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Assessment information (such as MiDYiS, KS2 data)
- Relevant medical information (such as allergies, medication etc)
- Special educational needs information where relevant
- Behavioural information including exclusions where relevant
- Post-16 learning information

Why we collect and use this information

- We use the student data:
 - to support student learning
 - to monitor and report on student progress
 - to provide appropriate pastoral care
 - to assess the quality of our services
 - to comply with the law regarding data sharing
 - to enter students for exams
- We use the parent data:
 - to respond to requests for information about joining the school
 - to communicate with you

The lawful basis on which we use this information

Data will be processed for the purposes of responding to requests for information about joining the school and the school will therefore have a “legitimate interest” for processing basic personal data and sensitive personal data. The data the school holds will be the minimum it requires.

The submission of student data for the school census is a statutory requirement under the Education Act 1996.

Collecting student and parent information

Whilst the majority of student and parent information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain student information to us or if you have a choice in this.

Storing student and parent data

We hold student data for the period of from their date of birth plus 25 years.

If they have an Education Health Care Plan we hold student data up to their date of birth plus 30 years.

If the student is on the child protection register and is the subject of a multi-agency plan their data will be held indefinitely.

Email correspondence between the school and any second party is deleted after 3 months of sending or receiving unless it has been manually saved in a school SharePoint folder.

Who we share student information with

We routinely share student information with:

- Schools that the student attends after leaving us
- our local authority
- the Department for Education (DfE)
- the Independent Schools Council (ISC)
- The Independent Schools Inspectorate (ISI)
- our IT network provider (Itech)
- the School doctor
- exam boards including for music and LAMDA
- our Careers provider (Morrisby)
- colleges and UCAS where references are requested

Why we share student information

We do not share information about our students with anyone without consent unless the law and our policies allow us to do so.

We share students' data with the Department for Education (DfE) and the Independent Schools Council (ISC) on a statutory basis. This data sharing falls under our annual census compliance obligations.

We are required to share information about our students with the (DfE) under regulation 5 of The Education (Information About Individual Students) (England) Regulations 2013.

Data collection requirements:

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Youth support services

Students aged 13+

Once our students reach the age of 13, we also pass student information to our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- youth support services
- careers advisers

A parent or guardian can request that only their child's name, address and date of birth is passed to their local authority or provider of youth support services by informing us. This right is transferred to the child / student once he/she reaches the age 16.

Students aged 16+

We will also share certain information about students aged 16+ with our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- post-16 education and training providers
- youth support services
- careers advisers

For more information about services for young people, please visit our local authority website.

The National Student Database (NPD)

The NPD is owned and managed by the Department for Education and contains information about students in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

We are required by law, to provide information about our students to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Students) (England) Regulations 2013.

To find out more about the NPD, go to

<https://www.gov.uk/government/publications/nationalstudent-database-user-guide-and-supporting-information>.

The department may share information about our students from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to student information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided student information, (and for which project), please visit the following website:

<https://www.gov.uk/government/publications/national-student-database-requests-received>

To contact DfE: <https://www.gov.uk/contact-dfe>

Requesting access to your personal data

Under data protection legislation, parents and students have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact our Compliance Lead, Ms Jan Kemp at Kingsley School.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Privacy Notice: How we use school workforce information

Kingsley School and Kingsley Education Limited are the Data Controllers for the use of personal data in this privacy notice.

The categories of school information that we process

These include:

- personal information (such as name, employee or teacher number, national insurance number, next of kin and contact details)
- characteristics information (such as gender, age, ethnic group)
- contract information (such as start dates, hours worked, post, roles and salary information)
- work absence information (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught)
- Relevant medical information

This list is not exhaustive.

Why we collect and use workforce information

We use school workforce data to:

- enable the development of a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- enable individuals to be paid
- monitoring staff attendance
- safeguarding purposes
- complete the school workforce census (Kingsley School employees only)

The lawful basis on which we process this information

We may process your personal information, but no more than is necessary, to comply with a legal obligation which the school is subject to, to undertake public tasks vested in the school or because processing is necessary to comply with the terms and conditions of your contract of employment. In other circumstances, we will usually obtain your consent first. If we require your consent and it is given, you may withdraw this consent at any time.

If we are required to process sensitive information (referred to as special category information under the GDPR), then we will either process this information to comply with employment laws, to undertake a task carried out in the public interest or obtain your explicit consent.

Collecting workforce information

We collect personal information via job application forms, HR and Payroll information forms.

Workforce data is essential for the School's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with GDPR, we will inform you whether you are required to provide certain information to us or if you have a choice in this and we will tell you what you need to do if you do not want to share this information with us.

Storing workforce information

We hold data securely for the set amount of time shown in our data retention schedule. We generally hold employee personal information for the period of employment until termination plus a period of 7 years. For more information, please ask the Head's PA for a copy of our retention schedule.

Who we share workforce information with

We routinely share this information with:

- our local authority
- the Department for Education (DfE) / Education and Skills Funding Agency
- relevant pension providers

We may also share some information with:

- our IT network provider
- education support services
- payroll providers
- other employers for providing a reference
- our online health assessment provider

Why we share school workforce information

We do not share information about workforce members with anyone without consent unless the law and our policies allow us to do so.

Local authority

We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Department for Education (DfE)

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our School workforce with the DfE for the purpose of those data collections, under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Data collection requirements

The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to

<https://www.gov.uk/education/datacollection-and-censuses-for-schools>.

The DfE may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The DfE has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required

- the level and sensitivity of data requested; and
- the arrangements in place to securely store and handle the data.

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

To contact the department: <https://www.gov.uk/contact-dfe>

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the Headteacher at Kingsley School.

Depending on the lawful basis above, you may also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- a right to seek redress, either through the ICO, or through the courts

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Privacy Notice: How we use Directors' and Local Advisory Board Members' information

The categories of Directors' and Local Advisory Board Members' information that we collect, process, hold and share include:

- personal information (such as name, address, date of birth, telephone number)

Why we collect and use this information

We use governor and trustee data to:

- enable the development of a comprehensive picture of the governing body and Foundation Committee and their relevant skills to the role
- inform the future recruitment of additional governors and trustees
- communicate with you

The lawful basis on which we process this information

Data will be processed for the purposes of responding to requests for information about joining the Local Advisory Board of the school and the school will therefore have a "legitimate interest" for processing basic personal data and, if necessary, sensitive personal data. The data the school holds will be the minimum it requires.

Collecting this information

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 data protection legislation, we will inform you whether you are required to provide certain governor information to us or if you have a choice in this.

Storing this information

We hold Directors' and Local Advisory Board Members' data for 25 years from the date a Director or Local Advisory Board Member ceases in the role.

Who we share this information with

We routinely share this information with:

- the Department for Education (DfE) – it is a requirement of the Education Act 1996 for schools to provide, and keep up to date, the required governor information through their database
- the Independent Schools Council
- our IT contractor (Intech)
- Companies House (Directors only)

Why we share Directors' and Local Advisory Board Members' information

We do not share information about Directors and Local Advisory Board Members with anyone without consent unless the law and our policies allow us to do so.

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the Headteacher at Kingsley School.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means

- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Privacy Notice: How we use alumni information

Who we are

In this notice the words 'alumni' refers to those who have been students at this School. 'The School' being Stella Maris, Edgehill College, Grenville College and Kingsley School at any time they existed as independent entities or in a merged state.

The categories of alumni information that we collect, process, hold, share include:

- personal information (such as name, address, school roll number, email and telephone number, date of birth) (Mandatory)
- information about your financial transactions including subscriptions, donations, ticket and merchandise purchases (Mandatory)
- school information (School starting and leaving years, House, activities, teams and awards)
- post-School studies, qualifications and occupation (profession, employer, role, business address)
- details of your personal interests (activities and volunteering preferences)
- details of other family members who have attended the School
- communications and contact you have with us;
- technical information, including your login information and usage of the website,
- information about your attendance at events or the School

Why we collect and use this information

We use alumni data to deliver our alumni services (newsletters, subscriptions, online access, event invitations and bookings, merchandise purchases); to communicate with you and provide information that may be of interest to you as a past student of the School.

The lawful basis on which we process this information

Minimal mandatory data will be processed for the purposes of maintaining an accurate record of those who were educated at the School, maintaining the security of our online service and to manage the delivery of our alumni services (legitimate interest) Should you give consent, the additional voluntary data detailed above will be used to tailor our communications with you and to enable us to offer more specific services (event invitations, news, volunteering opportunities). We may inform you of fundraising campaigns and activities at the School

Collecting this information

The minimum required information we hold is mandatory to secure our alumni service. The remaining information is voluntarily provided and you have a choice in providing this.

Routine contact with alumni will be via email provided we have your consent. Postal communications will be limited, however, you can request to receive written communications only by contacting the School.

Storing this information

The retention period for alumni data will be unlimited as long as The Foundation believes it has a relationship to serve with the alumni. Financial and transactional information will be held for 15 years only.

Who we share this information with

The School will routinely share this information with our IT system.

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the Headteacher at

Kingsley School. You have the right to withdraw your consent to data processing at any time; however, this will only apply to certain groups of data for which you have given particular consent. If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

RJ Pavis

Head