



Kingswood House School

Registered Charity Number 312044

Registered Company Limited Number 770891

Privacy Notice

This notice is reviewed annually to ensure compliance with current regulations and relates to the whole School including the Early Years Foundation Stage.

Created by: Sally Witts **Date:** September 2022
Reviewed by: Campbell McKelvie (Compliance Officer) 20 October 2023
Next Review date: 20 October 2024

This notice must be read in conjunction with the following policies:

- Storage and Retention of Records and Documents Policy
- Taking, Storing and Using Images of Children Policy
- Anti-Bullying Policy
- E-Safety Policy
- Bring Your Own Device (BYOD) Policy
- CCTV Policy
- Child Protection Policy
- Staff Privacy Notice – if appropriate

Please also find attached the following appendices:

- Appendix A - Privacy Notice for Parents
- Appendix B - Draft letter to the Information Commissioner's Office (ICO)
 (From the [ICO Page](#) – How to make a data protection complaint)
- Appendix C - Privacy Notice for Pupils
- Appendix D - Privacy Notice for Governors
- Appendix E - Privacy Notice for Alumni
- Appendix F - Privacy Notice for Staff and Volunteers
- Appendix G - Table of Suggested Retention Periods

KINGSWOOD HOUSE SCHOOL – THE DATA CONTROLLER

Kingswood House School Trust Limited of 56 West Hill, Epsom, KT19 8LG, for the purposes of this policy, is the Data Controller. This means that the School determines how its staff, its current, past and prospective pupils, and their parents, carers or guardians (referred to in this policy as "parents") personal data is processed and for what purpose.

THE DATA SUBJECTS

For the purposes of this policy, Data Subjects are its staff, its current, past and prospective pupil, and their parents, carers or guardians (referred to in this policy as "parents").

THE GENERAL DATA PROTECTION REGULATION - GDPR

A version of GDPR has been passed into UK law (the 'UK GDPR'), to sit alongside the UK Data Protection Act 2018 ('DPA 2018'). It is designed to bring data protection legislation into line with new, previously unforeseen, ways that data is now used. It also gives people more say over what companies can do with their data.

Data Controllers (the School) are expected to ensure that it is transparent on how Data Subjects' information is used and to detail this in clear language in their Privacy Notice.

WHAT THIS PRIVACY NOTICE IS FOR

This Privacy Notice is intended to provide information about how the School will use (or "process") personal data about individuals including: its staff, its current, past and prospective pupils, and their parents, carers or guardians (referred to in this policy as "parents").

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, parents and pupils are all encouraged to read this Privacy Notice and understand the School's obligations to its entire community.

This Privacy Notice 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.

This Privacy Notice also applies in addition to the School's other relevant terms and conditions and policies, including:

- any contract between the School and its staff or the parents of pupils;
- the School's policy on taking, storing and using images of children;
- the School's CCTV policy;
- the School's retention of records policy;
- the School's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the School's IT policies, including its E-Safety, Bring Your Own Device and Remote Working Policy and the Anti-Bullying Policy.

Anyone who works for, or acts on behalf of, the School (including staff, volunteers, governors and service providers) should also be aware of and comply with this Privacy Notice and the School's Staff Privacy Notice and the relevant appendices attached to this notice, which also provides further information about how personal data about those individuals will be used.

RESPONSIBILITY FOR DATA PROTECTION

The School has appointed Campbell McKelvie (Compliance Officer), who will deal with all your requests and enquiries concerning the School's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this notice and Data Protection Law.

Any enquiries relating to the School's use of your personal data should be sent to *compliance@kingswoodhouse.org*.

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to staff, pupils and parents, the school needs to process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of its daily operation.

Some of this activity the school will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with its staff, or parents of its pupils.

Other uses of personal data will be made in accordance with the school's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

The School expects that the following uses will fall within that category of it's (or its community's) "**legitimate interests**":

- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents);
- To provide education services, including musical education, physical training or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with alumni and the School community, including direct marketing or fundraising activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
- To give and receive 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;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the school;
 - To safeguard pupils' welfare and provide appropriate pastoral care;
 - To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's relevant IT policies;
 - To make use of photographic images of pupils in School publications, on the School website and (where appropriate) on the School's social media channels in accordance with the School's policy on Taking, Storing and Using Images of Children;
 - For security purposes, including CCTV in accordance with the School's Taking, Storing and Using Images of Children policy;
 - To carry out or cooperate with any School or external complaints, disciplinary or investigation process; and
 - Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.

In addition, the School will on occasion need to process **special category personal data** (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required.

These reasons will include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take 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: for example for medical advice, for social 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;
- To provide educational services in the context of any special educational needs of a pupil;
- In connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans;
- To run any of its systems that operate on biometric data, such as for security and other forms of pupil identification (lockers, lunch etc.);
- As part of any School or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- bank details and other financial information, e.g. about parents who pay fees to the school;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- personnel files, including in connection with academics, employment or safeguarding;
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- 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 staff, pupils and parents past and present; and
- images of pupils (and occasionally other individuals) engaging in School activities, and images captured by the school's CCTV system (in accordance with the School's Taking, Storing and Using Images of Children Policy);

HOW THE SCHOOL COLLECTS DATA

Generally, the School receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However 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.

WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH

Processing by third parties - For the most part, personal data collected by the school will remain within the school, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). However, if we need to outsource any functions we will do so in accordance with Data Protection Law. This type of external data processing is always subject to contractual assurances that personal data will be kept securely and used only in accordance with the school's specific directions.

Data sharing - Occasionally, the School will need to share personal information relating to its community of staff, pupils and parents with third parties, such as:

- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- examination boards;
- government authorities (e.g. HMRC, DfE, police or the local authority); and

- appropriate regulatory bodies e.g. the Independent Schools Inspectorate, the Charity Commission or the Information Commissioner.

ACCESS TO, AND SHARING OF, SENSITIVE DATA

Particularly strict rules of access apply in the context of “special category” data, most notably:

- medical records
- pastoral or safeguarding files.

Medical data - The school needs to process such information to comply with statutory duties and to keep pupils and others safe, but the school will ensure only authorised staff can access information on a need-to-know basis. This may include wider dissemination if needed for school trips or for catering purposes. Express consent will be sought where appropriate.

However, a certain amount of any SEND pupil’s relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

Safeguarding data - Staff, pupils and parents are reminded that the school is under duties imposed by law and statutory guidance (including *Keeping Children Safe in Education* or ‘KCSIE’) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, low-level concerns records kept about adults (which may include references to pupils or family members), and in some cases referrals to relevant authorities such as the LADO, Children’s Services, CAMHS or the police.

KCSIE also requires that, whenever a child leaves the school to join another school or college, his or her child protection file is promptly provided to the new organisation, along with any other information which the school’s Designated Safeguarding Lead considers material to the ongoing care needs of any pupil. Where appropriate, the School will consult with parents as to how these needs are best served, but ultimately the decision as to what information is necessary to share with the new school or college is a safeguarding question that must be reserved to the school. The school will retain a copy of the child protection file in accordance with its retention policy for material related to safeguarding matters.

For further information about this please visit the [Kingswood House School Website](#) to view the school’s Child Protection Policies.

HOW LONG WE KEEP PERSONAL DATA

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how

long to keep ordinary staff personnel files is up to 7 years and until the age of 25 for pupil personal files and until the age of 35 for pupils with Special Educational Needs (SEN).

If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the School's Compliance Officer, Mr Campbell McKelvie at compliance@kingswoodhouse.org. However, please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such request.

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"). Please refer to the 'Table of suggested retention periods' at Appendix G, from the School's Storage and Retention of Records Policy, for further information.

KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The School will use the contact details of parents, alumni and other members of the School community to keep them updated about the activities of the School, or alumni and parent events of interest, including the sending of updates, newsletters, emails and by post.

Unless the relevant individual objects, the School will also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the School community, such as the Kingswood House Association – KHA (Parent's Association);
- Contact parents and/or alumni (including via the KHA) by post and email in order to promote and raise funds for the School;
- Should you wish to limit or object to any such use, or would like further information about them, please contact the Privacy and Compliance Officer in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the School is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

YOUR RIGHTS

Individuals (both pupils and parents) have various rights under Data Protection Law to access and understand their own personal data held and processed by the school, and in some cases ask for it to be erased or amended, or to have it transferred elsewhere, or for the school to stop processing it – but subject to certain exemptions and limitations.

The school will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is generally one month, but actually fulfilling more complex or multiple requests, e.g. those involving third party information, may take 1-2 months longer).

Rights of access, etc.

The school will be better able to respond quickly to smaller, targeted requests for information made during term time. If the request for information is manifestly excessive or similar to previous requests, the school may ask you to reconsider, or require a reasonable fee for the administrative costs of complying with the request, or in certain cases refuse the request (but only where Data Protection Law allows it, and in accordance with relevant regulatory guidance).

If you consider that the personal data we hold on you is inaccurate, please let us know by emailing our Compliance Officer at compliance@kingswoodhouse.org. However, the school will not necessarily delete or amend views, opinions, notes or records purely on the request of an individual who disputes the account, although we may keep a record of all parties' viewpoints.

Requests that cannot be fulfilled

You should be aware that GDPR rights (including the right of access) are limited to your own personal data, and certain data is exempt. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – [please see further below]), or information which is subject to legal privilege (for example legal advice given to or sought by the school, or documents prepared in connection with a legal action, or where a duty of confidence is owed by a legal adviser).

The school is also not required to disclose any pupil examination scripts (or other information consisting solely of pupil test answers, potentially including in mock exam scripts or other types of exams / tests used to assess performance – although markers' comments may still be disclosable if they constitute pupil personal data). The school is also not required to provide examination or other test marks ahead of their ordinary publication date, nor share any confidential reference held by the school that was (or will be) given for the purposes of the education, training, appointment or employment of any individual.

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a proportionate legitimate interest identified in this Privacy Notice. Generally, if the school still considers the processing of the personal data to be reasonably necessary, it is entitled to continue. All such requests will be considered on their own merits.

Pupil requests

Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the School, they have sufficient maturity to understand the request they are making (see section 'Whose Rights?', below). A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, the law still considers the information in question to be the child's: for older pupils, the parent making the request may need to evidence their child's authority for the specific request.

Pupils aged 12 and above are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home. Slightly younger children may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

- Parental requests, etc.

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about pupils without their consent. The School may consider there are lawful grounds for sharing with or without reference to that pupil.

Parents will in general receive educational and pastoral updates about their children, in accordance with the Parent Contract. Where parents are separated, the School will in most cases aim to provide the same information to each person with parental responsibility, but may need to factor in all the circumstances including the express wishes of the child, any relevant court order or pastoral issues.

All information requests from, on behalf of, or concerning pupils – whether made under subject access or simply as an incidental request – will therefore be considered on a case-by-case basis.

Consent

Where the school is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Examples where we do rely on consent are for example: certain types of uses of images, certain types of fundraising activity. Please be aware however that the School may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because a purchase of goods, services or membership of an organisation such as an alumni or parents' association has been requested).

Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates. However, the School will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils – for example, under the parent contract, or via a form. Parents and pupils should be aware that this is not necessarily the same as the School relying on strict consent (see section on Consent above).

Where consent is required, it may in some cases, be necessary or appropriate – given the nature of the processing in question, and the pupil's age and understanding – to seek 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.

In general, the School will assume that pupils' consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupils' activities, progress and behaviour, and in the interests of the pupils' welfare. That is unless, in the School's opinion, there is a good reason to do otherwise.

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 confidentiality unless, in the School's opinion, there is a good reason to do otherwise; for example where the School believes disclosure will be in the best interests of the pupil or other pupils, or if required by law.

Pupils are required to respect the personal data and privacy of others, and to comply with the School's E-Safety policy and the parent handbook. Staff are under professional duties to do the same, covered under the relevant staff policies laid out in the staff handbook.

DATA ACCURACY AND SECURITY

The School will endeavour to ensure that all personal data held in relation to an individual is as up-to-date and accurate as possible. Individuals must please notify the School Office of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the School may need to process your data, or whom you may contact if you disagree.

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to School systems. All staff and governors will be made aware of this notice and their duties under Data Protection Law and receive relevant training.

THIS NOTICE AND UPDATES

The School will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the Compliance Officer, Mr Campbell McKelvie using the email address compliance@kingswoodhouse.org.

If an individual believes that the School has not complied with this notice or acted otherwise than in accordance with Data Protection Law, they should utilise the School complaints / grievance procedure and should also notify the Privacy and Compliance Officer. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.

Privacy Notice Kingswood House School – Parents (or guardians and careers) of pupils at the School, or applying to join the School

This appendix should be read in conjunction with the School's Privacy Notice. This Privacy Notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

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 to form and maintain the contract between you and the School.

The School will share your data with the following companies who have contracts with the School and who have equalled the School's precautions and systems for dealing with data, these are:

- Photographers
- Health care service providers
- IT Contractor
- IT software provider
- Tour Operators

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the School organises, should this be envisaged for your child, you will be contacted for your consent; the consent will be limited in time and content if it is required.

The retention period for pupil data will be until the pupil reaches the age of 25, (35 for pupils with special educational needs) and / or be modified by any other legal obligation the School finds itself under.

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. You can complain at any time about how the School has handled your data by contacting the Information Commissioner Helpline on 0303 123 1113. You can find a template letter, should you need it attached to the School's Privacy Notice, Appendix B.

We will obtain the data the School requires from you, should we need data from other sources we will contact you within a month. We see the provision of personal data as necessary to properly admit your child to the School and fulfil our obligations under the contract once your child is a pupil here.

There is no automated decision making or profiling involved in this data stream into and through the School.

[Your full address]
[Phone number]
[The date]

[Name and address of the organisation]
[Reference number (if provided within the initial response)]

Dear [Sir or Madam / name of the person you have been in contact with]

Data Protection Complaint

[Your full name and address and any other details such as account number to help identify you]

I am concerned that you have not handled my personal information properly.

[Give details of your concern, explaining clearly and simply what has happened and, where appropriate, the effect it has had on you.]

I understand that before reporting my concern to the Information Commissioner's Office (ICO) I should give you the chance to deal with it.

If, when I receive your response, I would still like to report my concern to the ICO, I will give them a copy of it to consider.

You can find guidance on your obligations under information rights legislation on the ICO's website (www.ico.org.uk) as well as information on their regulatory powers and the action they can take.

Please send a full response within 30 days. If you cannot respond within that timescale, please tell me when you will be able to respond.

If there is anything you would like to discuss, please contact me on the following number [telephone number].

Yours faithfully
[Signature]

Privacy Notice Kingswood House School – Pupils at the School over the age of 12.

This appendix should be read in conjunction with the School's Privacy Notice.

This Privacy Notice will be provided to you at the time your data is being obtained, if it is being obtained directly. This means you get this when the School gets your data from your parents, or within a month.

Data will be processed for the purposes of allowing you to make the best of your time at Kingswood House School. The School will therefore have what is called a "legitimate interest" for processing basic personal data and sensitive personal data. The data the School holds will be the minimum it requires to allow you to thrive in your years here.

The School will share your data with the following companies who have contracts with the School and who have equalled the School's precautions, systems and procedures for dealing with data, these are:

- Photographers
- Health care service providers
- IT Contractor
- IT software providers
- Tour Operators

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the School organises, should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it is required.

The retention period for pupil data will be until you reach the age of 25 and 35 for pupils with special educational needs (SEN).

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. You can complain at any time about how the School has handled your data by contacting the Information Commissioner Helpline on 0303 123 1113. You can find a template letter, should you need it attached to the School's Privacy Notice, Appendix B.

We will obtain the data the School requires from you, should we need data from other sources we will contact you. We see the provision of personal data as necessary to properly manage your time at Kingswood House School and for the school to fulfil its obligations to you.

There is no automated decision making or profiling involved handling this data.

Privacy Notice Kingswood House School – Governors of the School.

This appendix should be read in conjunction with the School's Privacy Notice.

This Privacy Notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

Data will be processed for the purposes of responding to requests for information about joining the 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.

The School will share your data with the following companies who have contracts with the School and who have equalled the School's precautions, systems and procedures for dealing with data, these are:

- IT Contractor
- IT software provider
- Tour Operators

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the school organises, should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it is required.

The retention period for data on Governors to be held will be 25 years.

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.

You can complain at any time about how the School has handled your data by contacting the Information Commissioner Helpline on 0303 123 1113. You can find a template letter, should you need it attached to the School's Privacy Notice, Appendix B.

We will obtain the data the School requires from you, should we need data from other sources we will contact you first.

We see the provision of personal data as necessary to safeguard you and the School as it will allow the necessary checks to be made.

There is no automated decision making or profiling involved in this data stream into and through the School.

Privacy Notice Kingswood House School – Alumni

This appendix should be read in conjunction with the School's Privacy Notice.

Routine contact with alumni will be by surface mail. Email will only be used as a method of contact if the individual alumnus gives consent to be contacted in this way.

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

Should you give consent, data will be processed for the purposes of maintaining an accurate record of those who were educated at Kingswood House School. The School will process only the minimum personal data to achieve this purpose.

The School will not share your data with any companies associated with the School.

It is not necessary for data to be shared with other countries.

The retention period for alumni data will be unlimited as long as the school believes it has a relationship to serve with the alumnus.

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.

You can complain at any time about how the School has handled your data by contacting the Information Commissioner Helpline on 0303 123 1113. You can find a template letter, should you need it attached to the School's Privacy Notice, Appendix B.

We will obtain the data the School requires from you, should we need data from other sources we will contact you first.

Privacy Notice Kingswood House School – Staff and Volunteers

This appendix should be read in conjunction with the School's Privacy Notice.

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

Data will be processed for the purposes of the recruitment process 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.

The categories of school workforce information that we collect, process, hold and share include:

- personal information (such as name, employee number, national insurance number)
- special categories of data including 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)

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

The School will share your data with the following companies who have contracts with the School and who have equalled the School's precautions, systems and procedures for dealing with data, these are:

- IT Contractor
- IT software provider
- Pension provider (if relevant)
- HM Revenue and Customs

The School is also obligated to share your data with the Independent School's Inspectorate.

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the school organises, should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it is required.

The retention period for data on staff to be held will be a maximum of 7 years from end of contract of employment.

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.

You can complain at any time about how the School has handled your data by contacting the Information Commissioner Helpline on 0303 123 1113. You can find a template letter, should you need it attached to the School's Privacy Notice, Appendix B.

We will obtain the data the School requires from you, should we need data from other sources we will contact you first.

We see the provision of personal data as necessary to safeguard you and the School as it will allow the necessary checks to be made.

There is no automated decision making or profiling involved in this data stream into and through the School.

TABLE OF SUGGESTED RETENTION PERIODS

Types of Record/Document	Suggested Retention Period
School-Specific Records	
<ul style="list-style-type: none"> • Registration documents of School • Attendance Register • Minutes of Governors' meetings • Annual curriculum 	<p>Permanent (or until closure of the School)</p> <p>6 years from last date of entry, then archive</p> <p>6 years from date of meeting</p> <p>From end of year: 3 years (or 1 year for other class records: e.g. marks/timetables/assignments)</p>
Individual Pupil Records (NB – this will generally be personal data)	
<ul style="list-style-type: none"> • Admissions: application form, assessments, records of decisions • Examination results (external or internal) • Pupil file including: <ul style="list-style-type: none"> Pupil reports Pupil performance records Pupil medical records • Special Educational needs records (to be risk assessed individually) 	<p>25 years from date of birth (or, if pupil not admitted, up to 7 years from that decision)</p> <p>7 years from pupil leaving School</p> <p>All: 25 years from date of birth (subject to where relevant to safeguarding considerations: any material which may be relevant to potential claims should be kept for the lifetime of the pupil)</p> <p>Date of birth plus up to 35 years (allowing for special extensions to statutory limitation period).</p>
Safeguarding	
<ul style="list-style-type: none"> • Policies and procedures • DBS disclosure certificates (if held) 	<p>Keep a permanent record of historic policies</p> <p><u>No longer than 6 months</u> from decision on recruitment, unless DBS specifically consulted – but a record of the checks being made must be kept, if not the certificate itself</p>

<ul style="list-style-type: none"> • Accident/incident reporting • Child Protection files 	<p>Keep on record for as long as any living victim may bring a claim (NB civil claim limitation periods can be set aside in cases of abuse). Ideally, files to be reviewed from time to time if resources allow and a suitably qualified person is available</p> <p>If a referral has been made/social care have been involved or child has been subject of a multi-agency plan – indefinitely.</p> <p>If low level concerns, with no multi-agency act – apply applicable school low-level concerns policy rationale (this may be 25 years from date of birth OR indefinitely)</p>
Accounting Records	
<ul style="list-style-type: none"> • Accounting records (normally taken to mean records which enable a company’s accurate financial position to be ascertained & which give a true and fair view of the company’s financial state) • Tax returns • VAT returns • Budget and internal financial reports 	<p>Minimum – 3 years for private UK companies (except where still necessary for tax returns)</p> <p>Minimum – 6 years for UK charities (and public companies) from the end of the financial year in which the transaction took place</p> <p>Internationally: can be up to 20 years depending on local legal/accountancy requirements</p> <p>Minimum – 6 years</p> <p>Minimum – 6 years</p> <p>Minimum – 3 years</p>
Contracts and Agreements	
<ul style="list-style-type: none"> • Signed or final/concluded agreements (plus any signed or final/concluded variations or amendments) 	<p>Minimum – 7 years from completion of contractual obligations or term of agreement, whichever is the later</p>

<ul style="list-style-type: none"> • Deeds (or contracts under seal) 	Minimum – 13 years from completion of contractual obligation or term of agreement
Employee/Personnel Records (NB this will contain personal data)	
<ul style="list-style-type: none"> • Single Central Record of employees • Contracts of employment • Employee appraisals or reviews • Staff personnel file • Payroll, salary, maternity pay records • Pension or other benefit schedule records • Job application and interview/rejection records (unsuccessful applicants) • Immigration records • Health records relating to employees 	<p>Keep a permanent record of all mandatory checks that have been undertaken (but <u>not</u> DBS certificate itself: 6 months as above)</p> <p>7 years from effective date of end of contract</p> <p>Duration of employment plus minimum of 7 years</p> <p>As above, but <u>do not delete any information which may be relevant to historic safeguarding claims</u></p> <p>Minimum – 6 years</p> <p>Possibly permanent, depending on nature of scheme</p> <p>Minimum 3 months but no more than 1 year</p> <p>Minimum – 4 years</p> <p>7 years from end of contract of employment</p>
Insurance Records	
<ul style="list-style-type: none"> • Insurance policies (will vary – private, public, professional indemnity) 	Duration of policy (or as required by policy) plus a period for any run-off arrangement and coverage of insured risks: ideally, until it is possible to calculate that no living person could make a claim.

<ul style="list-style-type: none"> • Correspondence related to claims/renewals/notification re: insurance 	<p>Minimum – 7 years</p>
Environmental, Health & Data	
<ul style="list-style-type: none"> • Maintenance logs 	<p>10 years from date of last entry</p>
<ul style="list-style-type: none"> • Accidents to children 	<p>25 years from birth (longer for safeguarding)</p>
<ul style="list-style-type: none"> • Accident at work records (staff) 	<p>Minimum – 4 years from date of accident, but review case-by-case where possible</p>
<ul style="list-style-type: none"> • Staff use of hazardous substances 	<p>Minimum – 7 years from end of date of use</p>
<ul style="list-style-type: none"> • Risk assessments (carried out in respect of above) 	<p>7 years from completion of relevant project, incident, event or activity</p>
<ul style="list-style-type: none"> • Data protection records documenting processing activity, data breaches 	<p>No limit: as long as up-to-date and relevant (as long as no personal data held).</p>