KINGSTON
GRAMMAR SCHOOL

PRIVACY NOTICE FOR PARENTS, STUDENTS, ALUMNI AND ALL OTHER MEMBERS OF THE KGS COMMUNITY (EXCEPT STAFF AND GOVERNORS)

1. WHO WE ARE

We are Kingston Grammar School (referred to in this document as "the School" or "KGS"). KGS is a company registered in England and Wales, company registration number 03883748. Our charity registration number is 1078461 and our registered office is at 70 London Road, Kingston upon Thames, KT2 6PY. Full contact details are provided on our website: Kingston Grammar School | An Independent Co-Educational Day School

In carrying out our day-to-day activities we use personal information about individuals including: our staff; suppliers; current, past and prospective students; and their parents/ carers (referred to in this policy as "parents"). This makes the School a data controller for the purposes of the relevant legislation which includes the UK General Data Protection Regulation (UK GDPR), the UK Data Protection Act 2018 and the Data (Use and Access) Act 2025 ("data protection law").

2. WHAT THIS PRIVACY NOTICE IS FOR

This Privacy Notice applies to current, past and prospective students, their parents, carers and guardians (referred to in this Notice as "parents") and all other members of the KGS community (other than staff and governors – for whom the School has a separate Privacy Notice).

Alumni, their parents and other supporters of the School should also refer to the KGS Alumni Community Privacy Notice for further details about how their personal data may be processed for the purposes of maintaining and operating the database of contacts, communications and the online alumni community - Terms & Privacy | Kingstonians.

This Privacy Notice is intended to provide information about how the School will collect, use, hold and share ("process") personal data about individuals.

This information is provided because data protection law gives individuals rights to understand how their data is processed. This Privacy Notice sets out how we will use that information and what your rights are in respect of the data we hold about you.

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 the parents of students.

- the School's policy on Taking, Using and Storing images of children.
- the School's CCTV and Biometrics policies.
- the School's Records Management and retention policy.
- the School's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded.
- the School's IT policies including IT and Mobile Phone Acceptable Use, Student Device, Online Safety and AI policies.
- the Staff Recruitment, Selection and Disclosure policy.
- the School's Data Breach procedures.

3. RESPONSIBILITY FOR DATA PROTECTION

KGS has appointed the Director of Finance and Operations (DFO) as its Data Protection Lead, who will deal with your requests and enquiries concerning the School's processing of your personal data (see the section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and data protection law.

The DFO can be contacted at:

Kingston Grammar School
70 London Road
Kingston upon Thames
Surrey
KT2 6PY
Email: data@kgs.org.uk

The Information Commissioner's Office (ICO) is responsible for enforcing data protection law and has power to take action if a breach of the law occurs. The School is registered with the ICO as a Data Controller and has the registration number Z7584041.

4. TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

Types of personal data that the School may, from time to time, process includes, by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details.
- bank details and other financial information, e.g. about parents who pay fees to the School and/or apply for fees assistance and any source of funds and/or anti-money laundering information we are required to collect by law.
- Details of any gifts given to the School.
- car details (in limited circumstances where a parking space may be used).
- student biometric information, which will be collected and used by the School in accordance with the School's Biometrics policy.

- past, present and prospective student academic, disciplinary, safeguarding, and attendance records, assessment information, examination scripts and marks.
- past, present and prospective student admissions and other records including details about students and families and other personal data supplied, including but not limited to date of birth, ethnicity, religion and gender.
- nationality and other immigration status information (eg right to enter, live and study in the United Kingdom), including copies of passport information.
- information about student health and medical conditions, special educational needs and family circumstances/living arrangements.
- contact details for student emergency contacts and/or next of kin.
- references given or received by the School about students, and relevant information provided by previous educational establishments and/or other professionals or organisations working with students.
- correspondence with and concerning students and parents, past and present.
- images and video content of students (and occasionally other individuals) engaging in School activities including content captured by the School's CCTV system (in accordance with the School's CCTV and Taking, Using and Storing images of children policies).

See KGS Alumni Community Privacy Notice for further details relating to types of personal information collected in relation to alumni, their parents and other supporters: Terms & Privacy | Kingstonians

5. HOW THE SCHOOL COLLECTS DATA

Generally, the School receives personal data from the individual directly (including, in the case of students, from their parents). In relation to parents and students this may occur at various times before, during and after a student attends the School and through various points of contact with the School (eg careers and alumni groups, sports groups etc).

This may be via a form or through another online portal, 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, other professionals or authorities) or third-party service providers who credit and identity check parents and their sources of funds).

In addition, we may collect publicly available information (eg Linkedin, Companies House etc) including for the purposes of keeping in touch and prospective donor research (see section 10 below for Keeping in Touch and Supporting the School).

See KGS Alumni Community Privacy Notice for further details about where information is collected from in relation to alumni, their parents and other supporters: Terms & Privacy | Kingstonians

6. WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out our ordinary duties to staff, students and parents, the School needs to process a wide range of personal data about our community as part of our daily operations.

Some of this activity the School will need to carry out in order to fulfil our legal rights, duties or obligations – including where we have a legal obligation to share safeguarding information. Some processing will be necessary in order to fulfil our rights and obligations under a contract with our staff, or parents of our students.

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 our (or our community's) **"legitimate interests"** (as recognised in law or determined by the School):

- to support student learning.
- to provide appropriate pastoral care.
- to assess the quality of the School's services.
- for the purposes of student selection, to confirm the identity of prospective students and their parents, assess suitability for fee assistance, and retain a record if appropriate for the purposes of future applications or openings.
- To carry 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.
- to provide education services, including musical education, physical training or spiritual development, career services, extra-curricular activities to students, school visits, and monitoring students' progress and educational needs and processing entries for public examinations and universities – and including where such services are provided remotely (either temporarily or permanently).
- to report to and liaise with parents about their child's progress, welfare and development including by way of regular reports and parents' evenings.
- to organise and manage meetings, events and social engagements for students and parents.
- to maintain relationships with alumni and the School community, including by direct marketing or fundraising activity. See section 10 below for Keeping in Touch and Supporting the School and KGS Alumni Community Privacy Notice for further details: Terms & Privacy | Kingstonians
- for the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests.

- 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 students, including relating to outstanding fees or payment history, to/from any educational institution that the student attended or where it is proposed they attend; and to provide references to potential employers of past students.

- to enable students to take part in national or other assessments, and to publish the results of public examinations or other achievements of students of the School.

- to safeguard students' health and welfare and provide appropriate pastoral care (including following the requirements and recommendations of the government's guidance on Keeping Children Safe in Education (or "KCSIE").

- to monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's IT Acceptable Use policies, the Student Device, Online Safety and AI policies.

- to make use of photographic images and video content of students in School publications, on the School website, in any online digital archive and (where appropriate) on the School's social media channels in accordance with the School's policy on Taking, Using and Storing images of children.

- for security purposes, including CCTV and biometrics information, in accordance with the School's CCTV and Biometrics policies.

- for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

- for student registration purposes, including biometrics data in accordance with the School's Biometrics Policy.

- for regulatory record keeping/compliance purposes in respect of immigration requirements, as a visa sponsor.

- to comply with the law regarding data sharing.

- to carry out or cooperate with any School or external complaints, disciplinary or investigation process.

- to promote the School to prospective parents and students.

- where otherwise reasonably necessary for the School's purposes, including to undertake market research, 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 us by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons will include, but not limited to:

- to safeguard students' 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 health/medical condition or other relevant information where it is in the individual's interests to do so: for example for emergency medical care, to arrange the assessment of a student's health and medical conditions and special educational needs, 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 comply with public health requirements.

- to provide educational services in the context of making reasonable adjustments for a student's disability and/or any special educational needs of a student.

- to run any of its systems that operate on biometric data, such as for security and other forms of student identification (access, lockers, lunch etc.).

- as part of any School or external complaints, disciplinary or investigation process that involves such data, for example if there are special educational needs (SEN), health or safeguarding elements.

- for legal and regulatory purposes (for example child protection, diversity monitoring, health and safety and immigration/visa sponsorship compliance) and to comply with its legal obligations and duties of care.

7. 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 (ie on a "need to know" basis).

However, some functions are outsourced (eg IT systems, accounts software, cloud storage/records management, catering, educational visits, professional photography, design and print, events organisation and venues, apps, e-books and other software to support student learning and to facilitate the secure transfer of data when required).

This also includes the online database and online platform for alumni, their parents and other supporters of the School – see KGS Alumni Community Privacy Notice for further details including who has access to information: Terms & Privacy | Kingstonians

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.

Sharing Information With Third Parties

Occasionally, the School – including its governing body - will need to share personal information relating to its community with third parties, such as:

- professional advisers (e.g. lawyers, insurers, PR advisers and accountants).
- government authorities (e.g. HMRC, DfE, CAFCASS, police, Home Office, a relevant public health/NHS body or the local authority), and/or appropriate regulatory bodies e.g. Teaching Regulation Authority, Independent Schools Inspectorate, Charity Commission, Companies House, Information Commissioner or Joint Council for Qualifications (JCQ).
- any third-party organisation retained to assist with bursary application processes.
- another school when a student leaves to attend another school.
- various specialists and advisers who assist the School in fulfilling its obligations and may need a student's information if this is relevant to the support they provide.
- organisations such as examination boards, universities and UCAS, school visit providers or competition organisers in connection with learning and extra-curricular activities of students.
- trading subsidiaries, suppliers or service providers who provide services to KGS (caterers, transport providers etc).
- the School's Parent Staff Association (PSA)/the KGS Alumni Community/Music and Drama Societies.
- organisations with whom the School is involved through outreach initiatives.
- appropriate contractors, such as visiting music teachers or external investigators and consultants.
- Stage 3 complaints and appeal panels, which may include independent panel members.
- Third parties and their advisers in the event of a possible or actual sale, merger or other restructuring of the School, or we are reconstituting or setting up some form of joint working or partnership arrangement in the UK or abroad.

8. ACCESS TO AND SHARING OF SENSITIVE DATA

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

- Health and medical/special needs records; and
- pastoral or safeguarding files.

Medical/health data

The School needs to process such information to comply with statutory duties and to keep students 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 relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the student requires.

Safeguarding data

The School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education (KCSIE) and the Children Act 2004) 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 or where other statutory requirements are met. This is likely to include notes on personnel or safeguarding files, including low-level concerns records kept about adults which may include references to students or family members, and in some cases referrals to relevant authorities such as the Local Authority Designated Officer (LADO), Children's Services, CAMHS or the police.

The School is subject to a specific statutory duty to share information with certain organisations (including, but not limited to, local authorities, NHS Trusts, the police and other schools) where it is relevant to safeguarding and promoting a child's welfare. There is no threshold of risk or harm that needs to be met to trigger this duty and the only exception to it is in rare circumstances where sharing information would be more detrimental to the child than not sharing. Where the duty applies, confidential information can be shared without consent.

KCSIE also requires that, whenever a child leaves the School to join another School or College, their child protection file is promptly provided to the new organisation along with any other information which the School's Designated Safeguarding Lead (DSL) considers material to the ongoing care needs of any student. Where appropriate, the School will consult 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 relating to safeguarding matters.

For further information on this please refer to the School's Safeguarding & Child Protection Policy and Procedures.

The School may also send your personal data to other countries, for example when sending references or organising overseas visits.

9. 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. We retain parent and student files for 7 years following departure from the School or until the former student reaches the age of 25 – whichever is the later. Incident reports and safeguarding files will be retained for longer and in accordance with specific legal advice or recommendations from bodies such as the Inquiry into Child Sexual Abuse (IICSA).

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 DFO, who is designated as the Data Protection Lead. However, 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, and 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").

See KGS Alumni Community Privacy Notice for further details about how long information is is kept in relation to alumni, their parents and other supporters: Terms & Privacy | Kingstonians.

10. KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The School maintains a database of alumni/supporters/parents/organisations in order to stay in touch with its community and keep them updated about news, events, careers initiatives and fundraising activities.

Unless the relevant individual objects, the School may:

- share personal data about parents and/or students and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the School community, such as the Old Kingstonians Hockey Club, KGS Veterans Rowing Club etc.
- contact parents and/or alumni (including via the organisations above) in order to promote and raise funds for the School and, in rare circumstances, other causes the School may support.
- collect information from publicly available sources about parents' and former students' occupation, relevant interests and activities, in order to maximise the School's fundraising potential. The School may use third party suppliers such as wealth screening consultants and may share personal data with these suppliers only to the extent necessary for carrying out the School's instructions. We do not allow our third-party providers to use your personal data for their own purposes. All our third-party providers are required to take appropriate security measures to protect your personal information in line with our policies.

Should you wish to limit or object to any such use, or would like further information about them, please contact the Data Protection Lead in writing or by email at data@kgs.org.uk. You always have the right to update the data we hold on you, update your communication preferences or withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the School is nonetheless likely to retain some of your details (if only to ensure that no more communications are sent to that particular address, email or telephone number).

See also KGS Alumni Community Privacy Notice for further details about how information may be used, the basis for processing, and how to update consent preferences: Terms & Privacy | Kingstonians

11. YOUR RIGHTS

Individuals 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 have it transferred to others, or for the School to stop processing it – but subject to certain exemptions and limitations. See also KGS Alumni Community Privacy Notice for further details: Terms & Privacy | Kingstonians

The School will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within the statutory time-limits (which is generally one month, but actually fulfilling more complex or multiple requests, eg. 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. 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 UK 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 student examination scripts (or other information consisting solely of student test answers, potentially including in trial examination scripts or other types of exam/tests used to assess performance – although markers' comments may still be disclosable if they constitute student personal data).

- provide examination or other test marks ahead of any ordinary publication, 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.

Requests by or on behalf of students

Students 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 student of any age may ask a

parent or other representative to make a subject access request on their behalf.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger students, the law still considers the information in question to be the child's: for older students, the parent making the request may need to evidence their child's authority for the specific request. Requests not considered in the child's best interests may sometimes be refused.

Students aged 13 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 students without their consent. The School may consider there are lawful grounds for sharing with or without reference to that student.

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, court orders or pastoral issues.

All information requests from, on behalf of, or concerning students – 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 biometrics, certain types of uses of images and 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).

See also KGS Alumni Community Privacy Notice for further details about the legal basis for processing information and how to update consent preferences: Terms & Privacy | Kingstonians

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 students – for example, under the Parent Contract, or via a form. Parents and students 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 student's age and understanding – to seek the student's consent, either alongside or in place of parental 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 students' 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 student's activities, progress and behaviour, and in the interests of the student's welfare. That is unless, in the School's opinion, there is a good reason to do otherwise.

However, where a student 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 student or other students, or if required by law.

Students are required to respect the personal data and privacy of others, and to comply with the School's relevant policies e.g. Student Code of Conduct, Student IT and Mobile Phone Acceptable Use policy, Student Device policy and Online Safety policy. Staff are under professional duties to do the same covered under the Staff Code of Conduct and Staff IT Acceptable Use Policy.

You can find out more about your rights under applicable data protection legislation from the Information Commissioner's Office website available at www.ico.org.uk.

12. 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 DFO, as Data Protection Lead, 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, and of who 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.

See also KGS Alumni Community Privacy Notice for further details about how information is kept safe and up to date: Terms & Privacy | Kingstonians

13. THIS POLICY

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.

14. QUERIES AND COMPLAINTS

If you believe that the School has not complied with this Privacy Notice or acted otherwise than in accordance with data protection law, you should email the DFO as Designated Data Protection Lead [data@kgs.org.uk] with details of your complaint. The School will acknowledge your complaint within 30 days of receipt and will investigate and inform you of the outcome without undue delay (keeping you informed of progress as necessary).

If you are not satisfied with the outcome of your complaint, or if you feel the School has not handled it appropriately, you have the right to complain to the Information Commissioner's Office (ICO). Parents of current students may also use the School's Complaints Procedure.