KING EDWARD'S SCHOOL
POLICY DOCUMENT

Title:	**Privacy Notice**
Status	Approved
Current Author	Governance & Data Lead
Last Updated/Revised	October 2026
Application	Whole School
Responsibility	Bursar/ Governance & Data Lead

Record of changes to this notice:	
June 2023	• Adaptation of template notice for KES specific use • Clarification of Data Protection Rights & Responsibilities • Addition of legitimate interest categories including wealth screening.
April 2024	• Change of legal basis from consent to legitimate interest for direct marketing by electronic means (including fundraising). This also applies to the alumni community. • An LIA has been approved.
March 2026	• Inclusion of The King Edward's School, Bath 1552 Foundation, a subsidiary charity of King Edward's School, Bath, within this Privacy Notice. • Clarification of parental access rights to pupils' data.
Sept 2026	• Change of DPO and amendments to reflect KCSIE/DUAA • Inclusion of Joint Controller arrangements for the 1552 Foundation and KES Bath Ventures Limited. • Clarification around data processing activity and application of lawful bases

Specific Terms

This privacy policy applies to all personal data processed by King Edward's School and its subsidiary companies, organisations, businesses and clubs. In this policy, these are all collectively called the "School". Please note there is a separate privacy notice for staff, volunteers and governors.

King Edward's School is a charity and our registered charity number is 1115875.

The King Edward's School, Bath 1552 Foundation, charity number 1214031, works alongside the School on alumni engagement and fundraising activities and is considered part of the School for the purposes of this policy. **King Edward's School, Bath** and **The King Edward's School, Bath 1552 Foundation** jointly determine the purposes and means of processing certain personal data and therefore act as **joint controllers** under Article 26 UK GDPR

KES Bath Ventures Ltd, a private limited company incorporated in England and Wales with company number 17165286, is a wholly-owned trading subsidiary of the School incorporated to undertake trading and commercial activities that support the charitable purposes of the School and is considered part of the School for the purposes of this policy. **King Edward's School, Bath** and **KES Bath Ventures Ltd** jointly determine the purposes and means of processing certain personal data and therefore act as **joint controllers** under Article 26 UK GDPR.

King Edward's School is a "data controller."	This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.
Data Protection Officer (DPO):	**Data Protection Officer** Data Protection Education Ltd 41 High Street Royston Hertfordshire SG8 9AW Email: info@dataprotection.education Individuals also have the right to raise a concern with the **Information Commissioner's Office**.
Governance & Data Lead	Tracy Vaid Email: dataprotection@kesbath.com
Personal data	Any information relating to an identified or identifiable individual
Special category personal data and Criminal Offence data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, Genetic and biometric data, Data concerning health, sex life or sexual orientation. Criminal offence data including criminal activity, allegations, investigations and proceedings.

Privacy Notice



This Privacy Notice applies to all pupils and parents, (past, present and prospective), and wider members of our School community about whom we collect personal data including:

- Pupils and prospective pupils
- Parents and carers
- Alumni, donors and supporters
- Visitors

This Privacy Notice explains how the School collects, uses and shares (or "processes") your personal data during and after your relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR) and your rights in relation to the personal data we hold.

Please see the Privacy Notice for Staff on the School website for information regarding personal data of:

- staff at the School, including: employees, contractors, visiting music teachers and other peripatetic workers,
- casual workers, temporary workers, and volunteers who may be employed or engaged by the School to work for it in any capacity,
- prospective applicants for roles
- governors / trustees / directors.

This Privacy Notice applies in addition to the School's other relevant terms and conditions and policies that may (depending on your role and status) apply to you, including:

- any contract between the School and its parents, such as the parent contract, parents' code of conduct and any applicable parents' handbook;
- the School's data governance policies including the Data Protection Policy.

Please note that any contract you may have with the School will be relevant to how the School processes your data, in accordance with any relevant rights or obligations under that contract. However, this Privacy Notice is the primary document by which we notify you about the use of your personal data by the School.

This Privacy Notice also applies alongside any other information the School may provide about particular uses of personal data, for example when collecting data via an online or paper form.

All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

How we collect your information

We may collect your personal data in a number of ways, for example:

- from the information you provide to us during contact regarding a School place, for example during a School tour or introductory phone call;
- when you submit a formal application to us, and provide your personal data in application forms and covering letters, or when you complete a self-declaration, etc.;
- from third parties, for example a previous School, local authority and/or the DfE
- as additional data during your child's time at the School, for example in email communication, written assessments or trip permission;
- from pupils at your time of leaving the School to record your contact details where agreed;
- from information you provide through your engagement with the School including our registration forms and our signing in system.

The types of information we collect

The categories of information that we process include by way of example:

- personal identifiers and contacts (such as name, date of birth, unique pupil number, contact details and address);
- car details (of those who use our car parking facilities).
- bank details and other financial information (including about parents and other individuals who pay fees to the School, are receiving bursary awards or those people who donate to the School);
- personal characteristics (such as ethnicity, language, and country of birth);
- safeguarding information (including court orders and professional involvement);
- special educational needs (including pupil needs);
- medical and administration (such as doctors' information, child health, allergies, medication and dietary requirements and medical treatment records) held and accessed by medical staff and by any teaching and pastoral staff that need to be aware;
- admissions and attendance for pupils (such as sessions attended, number of absences, absence reasons, any previous Schools attended and where pupils go when they leave)
- assessment and attainment for pupils (including academic records and examination scripts and marks);
- pupil behavioural information (such as exclusions and any relevant alternative provision put in place);
- images/videos of pupils engaging in School activities (including for the purpose of their education and/or sport performance);
- images captured by the School's CCTV system that are used for the purposes of safeguarding and promoting the welfare of pupils, staff and visitors and for the protection of property, in accordance with the Information Commissioner's Office (ICO) Code of Practice and the School's policy on taking, storing and using images of children;
- information required for authentication as part of the School's technical security;
- information viewed and accessed as part of the School's online safety obligations, including monitoring and filtering of School accounts and devices, in accordance with the School's data governance policies and KCSIE;
- information required for pupils attending School organised trips.

The categories of past, present and prospective pupils, parents and guardian information that we process include, by way of example:

- Contact information such as name, address, email address, contact numbers;
- Historical records of your time in School, including records of your achievements and interests, photos and videos;
- Records of contributions you have made to the School since leaving, such as your time, expertise, or financial contribution;
- Records of how you have engaged with our alumni network, including emails you have opened, events attended, mailing lists you have signed up to and other interactions;
- Bank details;
- Records associated with Gift Aid claims on donations;
- Records of your consents and contact preferences;
- Information required to manage your attendance at alumni events, including access arrangements and dietary requirements which may include health conditions; and
- CCTV footage when attending our School site;
- account and authentication data;
- device and network identifiers;
- system and activity logs;
- prompts, responses or submissions entered into approved AI systems;
- filtering and monitoring alerts;
- learning activity and assessment information;
- technical and usage information.

The lawful basis on which we collect and use your data

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

- Where we need to perform the contract we have entered into with you;
- Where we need to comply with a legal obligation (such as health and safety legislation, under statutory codes of practice including our duty to safeguard pupils and employment protection legislation).
- Where it is needed in the public interest or for official purposes; it is necessary for us to hold and use information for the purposes of our functions in providing Schooling, which is in the public interest.
- When we need to use your information to protect your vital interests or those of someone else (e.g. if you or they are seriously hurt).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests, rights and freedoms do not override those interests; We have a legitimate interest in holding and using information because it is necessary in order to provide pupils with education and pastoral care and connected purposes including:

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations and this is the lawful basis on which we use most of the information above.

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 situations in which we will process your personal information under the basis of 'legitimate interest' are as follows:

- For the purposes of pupil selection: to confirm the identity of prospective pupils and their parents and to retain a record if appropriate for the purposes of future applications or openings
- To provide education services, including musical education, physical training or development, career services, and co-curricular activities to pupils, and monitoring pupils' progress and educational and pastoral needs (including where such services are provided remotely (either temporarily or permanently));
- 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 the pupils of the School;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- identifying and responding to welfare concerns or risks of harm;
- managing attendance and inclusion;
- supporting mental health and wellbeing interventions;
- supporting multi-agency safeguarding arrangements;
- operating filtering, monitoring and online-safety systems;
- protecting networks, accounts, devices and premises;
- detecting unauthorised access, misuse, cyber-security threats and safeguarding risks
- To monitor use of the School's IT and communications systems in accordance with the School's Acceptable Use policies and procedures;
- 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 Child Protection & Safeguarding Policy;
- For security purposes including CCTV in accordance with the School's CCTV policy
- To carry out or co-operate with any School or external complaints, disciplinary or investigation process;
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law, market analysis and assessing pupil and parent satisfaction;
- To secure funding for the School or on behalf of individual pupils;
- For maintenance of historic archive;
- To maintain relationships with the alumni and the School community, including direct marketing or fundraising activity; we will provide a simple opportunity to opt out when information is collected and in every subsequent electronic marketing communication.
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests.

When will the School seek to obtain consent?

We do not usually need consent to use personal information. Where we do require consent, we will contact you, or your child if your child is deemed to be of the age appropriate to provide their own consent. Please remember that, once given, consent may be withdrawn at any time. We will seek consent in the following instances:

- Examination Results: The School will separately inform pupils and parents (and provide an opportunity to raise any objections) where it intends to publish exam results other than on an anonymous basis (e.g. if released to the media or on a publicly accessible notice board).
- Monitoring emails, internet and telephone usage: Strict rules apply to monitoring of pupil internet use, emails and calls. Although Keeping Children Safe in Education(KCSIE)) prescribes that Schools have in place appropriate filtering and monitoring for the purpose of safeguarding, this will not be used as a basis to allow casual or routine interception of communications, notably calls and messaging. However, monitoring may become justifiable in certain circumstances in compliance with KCSIE.
- Using certain types of Special Category Personal Data
- Unexpected or intrusive uses of images of pupils: certain uses, such as CCTV or School photography for use in the School's own "community" media (including emailed newsletters and the intranet), including where individuals are clearly identifiable from the photograph, and sometimes named, are considered to be part of the contractual and legitimate interest of the School. However, should an individual not wish to be included in such usage, they should make this known to the School and those wishes will be respected.
- Sometimes, external image usage (uses by an external organisation for promotion or news) may be better dealt with by consent: especially where a child is identified by name or especially prominently featured, or in swimming or games uniform. In this instance, you can expect the School to seek consent.

Keeping in touch and supporting the School

The School will use the contact details of past and present parents, alumni and other members of the School Community (such as former employees and volunteers) to keep them updated about the activities of the School, or events of interest, including sending updates and newsletters, by email, post, telephone and on social media. Unless the relevant individual objects, the School may 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 Old Edwardians' Association.
- Share personal data about parents and/or alumni with organisations set up for the public benefit, to advance education, in particular but not exclusively, by providing bursaries, assisted places, maintenance allowances and grants on the basis of financial need to pupils and former pupils of KES Bath; and providing support, items, services and facilities for KES Bath for the public benefit.
- Contact parents and/or alumni by post, email and/or phone to promote and raise funds for the School and, where appropriate, other worthy causes.
- Collect information from publicly available sources about parents', alumni and supporters' occupation and activities, to maximise the School's fundraising potential.

These may include the Electoral Register, Companies House, company websites, 'rich lists', social networks (such as LinkedIn), and so on. We may also undertake research or profile an individual's financial capability (sometimes called wealth screening) in-house or through reputable third-parties to get a better understanding of individuals so that we can target resources as effectively as possible.

- Should you wish to limit or object to any such use, or would like further information about them, please contact the Development and Alumni Relations Office in writing at the School's registered address.
- You always have the right to object to direct marketing or fundraising. To do so, please contact the Governance & Data Lead (contact details are contained in the Specific Terms section above). However, the School may need nonetheless to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

How we use Particularly Sensitive Information

Sensitive personal information (as defined under the UK GDPR as "special category data") require higher levels of protection and further justification for collecting, storing and using this type of personal information.

Where the School processes special category personal data, we will identify both:

- an Article 6 lawful basis; and
- an additional Article 9 UK GDPR condition.

Depending on the purpose of processing, these conditions may include:

- safeguarding children and individuals at risk;
- health and social care purposes;
- substantial public interest;
- vital interests;
- legal claims;
- archiving in the public interest; and
- explicit consent where appropriate.

Consent is used only where it is the most appropriate lawful basis and can be freely withdrawn.

We will use this information in the following ways:

- 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;
- To provide spiritual education in the context of any religious beliefs;
- To run any of its systems that operate on bio-metric 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 SEND, 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.
- Where we have obtained your explicit consent to use your information in a certain way;
- When we need to use your information under employment ,social security, or social protection law;
- When we need to protect an individual's vital interest (i.e. protect your life or someone else's life) in situations where you are physically or legally incapable of giving consent;
- Where the information has already been made obviously public by you;
- When we need to use it to make or defend legal claims;
- When we need to use it for reasons of substantial public interest as defined in legislation;
- Where we need to use it for health and social care purposes and it is used by, or under the direction of, a professional obliged to confidentiality under law;
- Where we need to use it for public health reasons and its used by, or under the direction of, a professional bound by confidentiality under law; and
- When we need to use it for archiving purposes, scientific or historical research purposes, and/or for statistical purposes, and the use is in the public interest.

Criminal Offence data

Where information concerning a parent's criminal convictions, cautions, allegations, investigations or other criminal offence data is relevant to the safeguarding, welfare or protection of a pupil, the School may retain and use that information to assess and manage safeguarding risks, comply with safeguarding obligations, implement court orders or contact restrictions, and protect children and vulnerable individuals. Processing is carried out under Article 6 UK GDPR and the safeguarding condition in Schedule 1 of the Data Protection Act 2018, with strict access controls and retention periods based on continuing safeguarding need.

Storing data - how long?

As a School we have lawful and necessary reasons to hold on to some information and we are required to keep certain records until pupils reach age 25, or beyond in some circumstances. After this time a record of pupils educated at the School is stored within the School Archives.

The School's Data Protection Policy provides information on the records we store and how long for. The School will retain personal data securely and only in line with how long it is necessary to keep it for a legitimate and lawful reason. The School's Data Protection Policy includes details of the retention periods for your data. In some instances, we will need to keep a record of your data (a suppression record) in order to fulfil your request to no longer be contacted by us.

Our Development and Alumni Relations Office keeps in touch with alumni, parents, former parents and supporters. We regularly review the length of time we retain information in our alumni and supporter database. The decision on how long to retain information is guided by legitimate interest, as the primary lawful basis, and by the contact preferences of individual alumni and supporters.

Storing data - security measures

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your

personal information to those employees, agents, contractors and other third parties who have a business need to know.

We take appropriate technical and organisational steps to ensure the security of personal data - some of our service providers may process personal data outside the United Kingdom. Where personal data is transferred to a country that is not covered by UK adequacy regulations, the School will use an appropriate transfer safeguard, such as the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, or another lawful safeguard. Where required, we will undertake a transfer risk assessment. Further information about relevant safeguards is available from the Governance & Data Lead.

We may also need to transfer data for the purposes of School trips, if parents live overseas or if a pupil moves to a new School abroad. If this happens, we will carry out checks and put security measures in place to make sure that it is safe to transfer the information. If we cannot be sure that it is safe, then we will talk to parents and / or pupils to make sure that you are happy for us to send the information. Please contact the Governance & Data Lead if you require further details of our security procedures.

Educational technology, digital systems and artificial intelligence

The School uses educational technology, digital learning platforms, safeguarding systems, administrative tools and security systems. Some of these systems may include artificial intelligence or automated features.

These systems may support teaching and learning, accessibility, translation, feedback, safeguarding and online-safety monitoring, communications, administration, cyber-security and the secure operation of School services.

The School assesses new systems before use, including their data protection and safeguarding implications. Providers acting on the School's behalf must comply with contractual, data protection and security requirements.

The School will provide appropriate human oversight where a system assists with a decision affecting an individual. The School does not make decisions producing legal or similarly significant effects about pupils or other individuals by automated means.

Sharing your information with others

Parents and pupils can still access personal data we hold through the UK GDPR right of access (Subject Access Request). We will consider such requests case by case, and we may redact or withhold information where an exemption or restriction applies (for example, to protect the personal data of third parties, safeguarding material, legal privilege, or where disclosure would cause serious harm).

Separately, some information may be made available under the parent contract, handbooks or routine parent communications. Where appropriate, the School will continue to share educational and pastoral updates with those who have parental responsibility, subject to the child's best interests, court orders, and safeguarding considerations.

For the most part, personal information collected by the School will remain within the School and will be processed in accordance with access protocols. Particularly strict rules of access apply in the context of:

- Medical records and
- Pastoral or safeguarding files

For the purposes referred to in this privacy notice and relying on the grounds for processing as set out above, we may share your personal data with certain third parties.

Legal
Where we need to comply with a legal obligation (such as health and safety legislation, under statutory codes of practice), we will share information with local authorities, the ISI, Ofsted, DfE.

Where there is a serious incident at School, we may need to share details with the Health & Safety Executive as well as the Charities Commission and our Insurance company.

In the investigation or prevention of crime, there are specific circumstances in which we would share information with the police.

Pupil Learning Support
Where a pupil has an EHCP or a record of additional learning support requirements, we will obtain information from/ send to the Local Authority.

Safeguarding

We may share personal information without consent where this is lawful, necessary and proportionate to:

- safeguard or promote the welfare of a child or vulnerable individual;
- protect a child or other person from harm;
- respond to safeguarding concerns, allegations or risks;
- obtain early help or additional support;
- make referrals to, or cooperate with, safeguarding partners, children's social care, health services, the police or other relevant agencies; or comply with our safeguarding, child protection and statutory obligations.

Information will only be shared with those who need it, and only to the extent necessary for the safeguarding purpose. Data protection legislation does not prevent the appropriate, lawful and proportionate sharing of information where failing to do so could place a child or other individual at risk. Decisions to share information will be recorded in accordance with the School's safeguarding and record-keeping procedures.

The School will promptly share a copy and also retain a copy of a pupil's Safeguarding record in line with the School's Record Keeping Policy following a move to another School.
Please also see the School's Safeguarding & Child Protection Policy.

Other

IT and Computing services - some of our activity is carried out on our behalf by third parties, such as IT software systems, web developers, cloud storage providers and mailing services. We will always make sure we have robust agreements in place with any third parties processing personal data on our behalf so that personal information will be kept securely and only in accordance with our instructions.

We may share personal information, where necessary and lawful, with:

- safeguarding partners, children's social care, local authorities, the police and other agencies involved in safeguarding and welfare (acting as independent controllers);
- health, medical and mental health providers (acting as independent controllers);
- courts, tribunals and emergency services (acting as independent controllers);
- auditors, insurers, lawyers and professional advisers (acting as independent controllers);

- educational technology, AI, identity management, cyber-security, filtering and monitoring providers, payment services, cloud hosting providers and managed IT service providers (generally acting as data processors on behalf of the School);
- research organisations and examination-related bodies where appropriate (generally acting as independent controllers); and
- contractors supporting school trips, transport, catering and activities (acting either as processors or independent controllers depending on the nature of the service provided).

We may need to share pupil and/or parent information with:

- Schools that pupils move to if they leave King Edward's and/or higher education institutions pupils apply to;
- our local authority or the local authority a pupil lives in;
- the Department for Education (DfE);
- UK Visas and Immigration;
- other bodies for the purpose of a pupil's education, for example competitions, co-curricular activities (including trips), examination boards and disclosures connected with SEN support;
- Where information is shared with the 1552 Foundation or KES Bath Ventures Limited, the organisations may act as joint controllers in accordance with the arrangements described in the Specific Terms section of this notice.

Information will be provided to those agencies securely or anonymised where possible.

Your rights as a data subject

You have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us (in certain circumstances) to erase your personal data;
- to request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.
- the right to be informed;
- the right to object to direct marketing at any time;
- rights relating to solely automated decisions producing legal or similarly significant effects.

If you want to exercise any of the above rights, please contact the Governance & Data Lead in writing via dataprotection@kesbath.com

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). 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.

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 calendar month) but fulfilling more complex requests may take longer – in this instance, we will inform you of the date you can expect to receive your information.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Rights that cannot be fulfilled

You should be aware that GDPR rights (including the right of access) is 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).

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.

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 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. Requests not considered in the child's best interests may sometimes be refused.

Pupils at King Edward's Senior School (13 years and older) 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. Children in the Junior School may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

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

Parental Requests

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, court orders 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.

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 pupil's activities, progress and behaviour, and in the interests of the pupil's 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 relevant policies including the IT Acceptable Use policy and the School Rules. Staff are under professional duties to do the same covered under the relevant staff policies.

Contact and complaints

If you have any queries about this privacy notice or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you should contact the Governance & Data Lead.

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Governance & Data Lead. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

We hope that the Governance & Data Lead can resolve any query you raise about our use of your information in the first instance. We have appointed a Data Protection Officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by the Governance & Data Lead, then you can contact the DPO – see contact details on page 1.

Making a data protection complaint

You may make a data protection complaint to the School by contacting the Governance & Data Lead using the details in this notice. We will acknowledge receipt within 30 days. We will take appropriate steps to investigate and respond to the complaint without undue delay, keep you informed of progress and notify you of the outcome. If you remain dissatisfied, you may contact the Data Protection Officer or complain to the Information Commissioner's Office.

Further details on how to do so can be found at https://ico.org.uk/make-a-complaint/

Data Processing Summary

Activity	Main Lawful Basis	Typical Data
Admissions	**Contract**	**Application and assessment data**
Education and pastoral care	**Contract / Legitimate Interests**	**Educational and welfare information**
Safeguarding	**Legal Obligation, Legitimate Interests**	**Safeguarding and welfare information**
Medical support	**Vital Interests / Legal Obligation**	**Health information**
SEND support	**Legal Obligation, Legitimate Interests**	**SEND information**
School communications	**Contract / Legitimate Interests**	**Contact information**
Alumni engagement	**Legitimate Interests**	**Contact and engagement records**
Fundraising	**Legitimate Interests**	**Supporter and donation information**
Wealth screening	**Legitimate Interests**	**Publicly available supporter information**
Security and online safety	**Legitimate Interests / Legal Obligation**	**Authentication, monitoring and CCTV information**

Parents | Pupils | Ex-Pupils | Alumni & Supporters

Lawful Basis for Processing Personal Data

The lawful basis relied upon will depend upon the particular circumstances of the processing activity. In some cases, more than one lawful basis may apply. Where the School processes special category personal data, an additional Article 9 UK GDPR condition will always be identified. The School maintains a detailed Record of Processing Activities and supporting Data Protection Impact Assessments where required.