



KINGSDALE FOUNDATION SCHOOL

DATA PROTECTION POLICY

Kingsdale Foundation School is registered under the Data Protection Act 2018.

General Statement of the School's Duties and Scope

The school is required to process relevant personal data regarding members of staff, volunteers, applicants, parents, students and their siblings, alumni and service users as part of its operation and shall take all reasonable steps to do so in accordance with this Policy.

Data Protection Controller

The school's appointed Data Protection Officer (DPO) are Judicium Education, who will endeavour to ensure that all personal data is processed in compliance with this Policy and the Principles of the Data Protection Act 1998. The GDPR, the Freedom of Information Act 2000 and the Protection of Freedoms Act 2012 are also relevant to parts of this policy.

The Principles

The School shall so far as is reasonably practicable to comply with the Data Protection Principles contained in the Data Protection Act to ensure all data is:

- Fairly and lawfully processed
- Processed for a lawful purpose
- Adequate, relevant and not excessive
- Accurate and up-to-date
- Not kept for longer than necessary
- Processed in accordance with the data subject's rights
- Secure
- Not transferred to other countries without adequate protection

Definitions

- Parental consent includes the consent of a guardian.
- Data Subject, an individual who is the subject of the personal data.

Personal Data

Personal data covers both facts and opinions about an individual where that data identifies an individual. For example, it includes information necessary for employment such as the member of staff's name and address and details for payment of salary or a pupil's attendance record and exam results. Personal data may also include sensitive personal data as defined in the Act.

Processing of Personal Data

Consent may be required for the processing of personal data unless processing is necessary for the performance of the contract of employment. Any information which falls under the definition of personal data and is not otherwise exempt, will remain confidential and will only be disclosed to third parties with appropriate consent.

Students' consent to process their data and disclose it to parents is implicit when they reach the age of 18. If a pupil wishes to revoke or change consent they must agree specifically on how their data is to be processed with the Data Processor.

Kingsdale Foundation School will publish a detailed Privacy Policy relating to any service that it provides where personal data will be used. For example; Kingsdale's Summer School, where information about Year 6 students and their families may be shared with third parties for purposes of external trips or other scheduled activities beyond the school. Use of such services, indicates acceptance and may grant additional consent as to how the school may process personal data.

Kingsdale Foundation School already processes some personal data for direct marketing, advertising and fund-raising purposes and recognises that data subjects have the right to request an opt-out to these activities, which must be respected.

Sensitive Personal Data

Kingsdale Foundation School may from time to time, be required to process sensitive personal data. Sensitive personal data includes data relating to medical information, gender, religion, race, sexual orientation, trade union membership and criminal records and proceedings.

Rights of Access to Information, including deletion of data

Data subjects have the right of access to information held by the Kingsdale Foundation School, subject to the provisions of the Data Protection Act 1998 and the Freedom of Information Act 2000. Any data subject wishing to access their personal data should put their request in writing, although verbal requests are also recognised.

Please contact Ms T. Dyer via dataaccessrequests@kingsdale.southwark.sch.uk to make a request for Personal Subject Data Access Request (SAR) or 0208 655 9723 for the data relating to an individual.

For requests made under the Freedom of Information Act (FOIA) or the Environmental Information Regulations, please contact the school in writing by letter at our registered address or via foi@kingsdale.southwark.sch.uk

Upon receipt the school will acknowledge the request and confirm the timescales that will apply subject to the relevant law.

The information will be passed on to the requestor as appropriate and as soon as is reasonably possible after it has come to the school's attention and in compliance with the relevant Acts.

Requests for the deletion of personal data can also be made and should be sent to Mr Sear's office via asrpa@kingsdale.southwark.sch.uk. Each such request is dealt with on a case-by-case basis, with due consideration of all other appropriate considerations, e.g. employment law, safeguarding etc. Where a decision to delete data following a request is made, this will usually be confirmed in writing to the requester and within the relevant timescales.

Exemptions

Certain data is exempted from the provisions of the Data Protection Act which includes the following:

- National security and the prevention or detection of crime
- The assessment of any tax or duty
- Where the processing is necessary to exercise a right or obligation conferred or imposed by law upon the School, including Safeguarding and prevention of terrorism and radicalisation

The above are examples only of some of the exemptions under the Act. Any further information on exemptions should be sought from the DPO.

Accuracy

The school will endeavour to ensure that all personal data held in relation to all data subjects is accurate. Data subjects must notify the data processor of any changes to information held about them. Data subjects have the right in some circumstances to request that inaccurate information about them is erased. This does not apply in all cases, for example, where records of mistakes or corrections are kept, or records which must be kept in the interests of all parties to which they apply.

Enforcement

If an individual believes that the School has not complied with this Policy or acted otherwise than in accordance with the Data Protection Act, the member of staff should utilise the school's grievance procedure and should also notify the DPO.

Data Security

The school will take appropriate technical and organisational steps to ensure the security of personal data.

All staff will be made aware of this policy and their duties under the Act. The school and therefore all staff and students are required to respect the personal data and privacy of others and must ensure that appropriate protection and security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to all personal data.

An appropriate level of data security must be deployed for the type of data and the data processing being performed. In most cases, personal data must be stored in appropriate systems and be encrypted when transported offsite. Other personal data may be for publication or limited publication within the School, therefore having a lower requirement for data security.

Attention is also drawn to the existing ICT and E-safety policies, which provide more specific information on digital data protection within the ICT policy.

External Processors

The school must ensure that data processed by external processors, for example, service providers, Cloud services including storage, web sites etc. are compliant with this policy and

the relevant legislation.

Secure Destruction

When data held in accordance with this policy is destroyed, it must be destroyed securely in accordance with best practice at the time of destruction.

Retention of Data

The school may retain data for differing periods of time for different purposes as required by statute or best practices and individual departments must incorporate these retention times into their processes and manuals. Other statutory obligations, legal processes and enquiries may also necessitate the retention of certain data.

The school may store some data such as registers, photographs, exam results, achievements, books and works etc. indefinitely in its archive, however these must be held securely with limited access to authorised persons only.

Please refer to our Data Retention Policy for further specific information.

CCTV

The School owns and operates a CCTV network for the purposes of crime prevention and detection, and Safeguarding. Where a data subject can be identified, images must be processed as personal data and follow the established protocols when relevant and necessary information is needed.

Complaints and Concerns

Should you wish to raise a concern relating a request for information that you have made, please refer to our guidance documentation pertaining to Internal Reviews for requests made under the Freedom of Information Act (FOIA) or the Environmental Information Regulations (EIR) which can be accessed via our website [here](#).

For all other queries relating to data or requests, please contact the school in the first instance, so we can seek to resolve your issue – info@kingsdale.southwark.sch.uk

Should you remain dissatisfied, you may contact the Information Commissioner's Office (ICO) via this [link](#).

Policy Date: June 2025

Review: Summer 2026