



FRIENDS OF KINGSLEY PRIVACY NOTICE

WHO WE ARE

The Friends of Kingsley is a parents' association for The Kingsley School and a charity with a registration number of 518138. Its contact address is c/o The Kingsley School, Beauchamp Hall, Beauchamp Avenue, Royal Leamington Spa, CV32 5RD

WHAT THIS PRIVACY NOTICE IS FOR

This policy is intended to provide information about how the Friends of Kingsley will use (or "process") personal data about individuals including: its committee members; its volunteers; school staff members involved; parents, pupils and any other parties involved.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Individuals involved or attending events arranged by Friends of Kingsley are encouraged to read this Privacy notice and understand the Friends of Kingsley's obligations to its community.

RESPONSIBILITY FOR DATA PROTECTION

The Friends of Kingsley committee members are responsible for ensuring your data is processed in compliance with the Data Protection Law. Any request or enquiry relating to this should be made to a Friends of Kingsley Committee Member, details of which can be found on The Kingsley School website.

WHY THE ASSOCIATION NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties such as events, activities, awards, donations, uniform sales, competitions etc. the association needs to process a range of personal data about individuals as appropriate to carry out these activities.

Most of the data processing required will be in response to an individual requesting to take part in an activity/event, resulting in the association processing appropriate and legitimate data in order to perform/fulfil that contract.

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

TYPES OF PERSONAL DATA PROCESSED BY THE FRIENDS OF KINGSLEY

This will include by way of example:

- names, child's name and form, addresses, telephone numbers, e-mail addresses and other contact details;
- bank details and other financial information, e.g. provided by parents who wish to sell 2nd hand uniform or for reimbursement of expenses;
- where appropriate, information about individuals' health and welfare (for example allergies) and contact details for their next of kin;
- images of committee members and pupils (and occasionally other individuals) engaging in Friends of Kingsley activities, (in accordance with the Kingsley school's policy on taking, storing and using images of children);

HOW THE ASSOCIATION COLLECTS DATA

Generally, the association 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 letters).

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

Occasionally, the Friends of Kingsley will need to share personal information relating to its community with third parties, such as:

- professional advisers (e.g. accountants, lawyers, insurers);
- government authorities (e.g. HMRC, police or the local authority); and
- appropriate regulatory bodies e.g. the Charity Commission or the Information Commissioner.

Friends of Kingsley works closely with The Kingsley School and shares relevant information if required for a legitimate purpose. Generally information sent to parents regarding Friends of Kingsley events is done so via The Kingsley School Clarion Call system. The Kingsley School has its own Privacy and Data Processing systems in place to comply with the Data Protection Law.

For the most part, personal data collected by the Friends of Kingsley will remain within the association and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis).

HOW LONG WE KEEP PERSONAL DATA

The Friends of Kingsley will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, data will be kept for up to 2 years from an event occurring to ensure accounting requirements are processed correctly.

YOUR RIGHTS

- Rights of access, etc.

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the association, and in some cases ask for it to be erased or amended or have it transferred to others, or for the association to stop processing it – but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to a committee member of the Friends of Kingsley.

The association 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 one month in the case of requests for access to information).

The association will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the association may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

- Requests that cannot be fulfilled

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. 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).

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 personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

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.

DATA ACCURACY AND SECURITY

The association 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 committee of any significant changes to important information held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or 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 association may need to process your data, of who you may contact if you disagree.

The association will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including rules/policies around use of technology and devices and confidential storage of data. All committee members will be made aware of this policy and their duties under Data Protection Law.

THIS POLICY

The association 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 a committee member of the Friends of Kingsley as detailed on The Kingsley School website.

If an individual believes that the association has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should notify the committee members. 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 association before involving the regulator.

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