



Privacy Policy

Kensington English by Kathryn Naegeli collects and uses personal information about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable Kathryn Naegeli and her team to provide the best education services possible and other associated functions. In addition, there may be a legal requirement to collect and use information to ensure that the school complies with its statutory obligations.

Purpose

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the Data Protection Act 1998 (DPA) and the General Data Protection Regulation 2018 (GDPR); and is applicable to all information, regardless of the way it is collected, recorded, stored and used before ultimately being destroyed when no longer necessary.

What is Personal Information?

Personal information or data is defined as data which relates to a living individual who can be identified from that data, or other information held.

Data Protection Principles

The DPA establishes eight enforceable principles that must be adhered to at all times:

1. Personal data shall be processed fairly and lawfully;
2. Personal data shall be obtained only for specified and lawful purposes;
3. Personal data shall be adequate, relevant and not excessive;
4. Personal data shall be accurate and where necessary, kept up to date;
5. Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose or those purposes;
6. Personal data shall be processed in accordance with the rights of data subjects under the DPA;
7. Personal data shall be kept secure i.e. protected by an appropriate degree of security;
8. Personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of data protection.

General Statement

Kensington English by Kathryn Naegeli is committed to maintaining the above principles at all times. Therefore, Kathryn Naegeli will:

- Inform individuals why the information is being collected when it is collected
- Inform individuals when their information is shared, and why and with whom it was shared
- Check the quality and the accuracy of the information it holds
- Ensure that information is not retained for longer than is necessary
- Ensure that when obsolete information is destroyed that it is done so appropriately and securely
- Ensure that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded
- Share information with others only when it is legally and professionally appropriate to do so
- Set out procedures to ensure compliance with the duty to respond to requests for access to personal information, known as Subject Access Requests
- Ensure all staff are aware of, and understand, policies and procedures



Information Collection

Naegeli collects information online

The information gained by these technologies include internet protocol (IP) addresses, types of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, and the number of clicks as part of

Kensington English by Kathryn through use of log files and cookies.

Google Analytics. The information generated by these technologies will be sent to a Google server in the United States and stored there. Google will use this information as mentioned above to compile reports analysing trends, tracking users' movement and gathering other demographic information. Similarly, Kensington English by Kathryn Naegeli makes use of Facebook plugins and the information collected via our accompanying Facebook Page.

Through our contact bar, you are freely supplying Kensington English by Kathryn Naegeli with your personal email account and/or telephone number. By using this method, you consent to the processing of your request and email address and its addition to the Kensington English by Kathryn Naegeli Mailing List. The Mailing List details your name and email address only, and you may opt out at any time.

Kensington English by Kathryn Naegeli collects data to create Student Profiles from the completed registration forms, correspondence and professional observations and evaluations. This is to support student learning, monitor and report on progress, provide appropriate pastoral care and assess the quality of our services. Categories of personal information within Student Profiles includes:

- Personal Information (name, age, address)
- Characteristics (home language)
- Medical Information (allergies, medical conditions, name of GP)
- Attendance Information
- Behavioural Information
- Assessment Information
- Schooling Information

Although some information is mandatory, in compliance with the GDPR, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

Information Storage

Information gained via log files, cookies and Facebook plugins are stored in accordance with the policies as prescribed by Google and Facebook, Inc: <http://policies.google.com/privacy>
<http://www.facebook.com/policy.php>.

Student Profiles are stored on paper, filed in a locked cupboard to which only Kathryn Naegeli holds the key. Information is stored for the period and two years beyond students' attendance at Kensington English by Kathryn Naegeli.

Information Sharing

If required by law, Google will pass information gained through their analysis on to third parties. Under no circumstances, shall Google connect your IP address with any other data held by Google. Should you wish, you may adjust your browser settings to prevent your IP address being saved now and in the future by installing a browser plugin available at <http://tools.google.com/dlpage/gaoptout>. For further information about the policy put in place by Facebook, Inc, please use the link above.



Kensington English by Kathryn students and their families. No

shared without explicit consent, unless stipulated by law. In the interest of security, Kathryn Naegeli provides all class teachers with a student list containing key medical information, pick up rights and contact numbers as provided on the registration form. It is the responsibility of the student, or their parents, to ensure this information is correct and up to date.

Naegeli respects the privacy of all personal and sensitive information is

During activities, staff and invited representatives do occasionally take photographs of students and their activities. These photos may be used for publication purposes unless otherwise stipulated.

Your Rights

You are entitled to make a request to access the personal information held about you by Kensington English by Kathryn Naegeli. Requests for information must be made in writing to admin@kensingtonenglishschool.com and will be dealt with by Kathryn Naegeli within 10 working days. In compliance with the GDPR, the identity of the requestor must be established before the disclosure of any information in the form of passport, driving licence or residence permit. Please note that the data within the Student Profile belongs to the named student, regardless of age. Should parents wish to gain access, permission must be granted by the student.

Kathryn Naegeli and her team of staff reserve the right to give immediate oral feedback on a student's progress, in keeping with the guidance issued from time to time from the Information Commissioner's Office. This is a free service offered by Kensington English by Kathryn Naegeli. In case of request for a formal written report to use as part of an application process for another school, the related fees fall under the Educational Consultancy bracket of services offered by Kensington English by Kathryn Naegeli and the 10 working days delay is applied. The written report will be discussed with staff and parents before being sent directly to the intended third party by Kathryn Naegeli.

In addition, you also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

Complaints

Complaints will be dealt with in accordance with the school's complaints policy.

Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every two years. The policy review will be undertaken by Kathryn Naegeli, or nominated representative.

Contacts

If you have any enquires in relation to this policy, please contact Kathryn Naegeli directly as she alone acts as the contact point.



Date adopted: 23 May 2018

Last review: 23 May 2020

Next review: May 2022