

Knightsbridge School Education Foundation

Policies

Knightsbridge School Education Foundation has a comprehensive set of policies to:

- a)** Ensure that it operates effectively, transparently, and equitably; and
- b)** Protect donors and ensure transparency and accountability in the management of donations.

Each policy is documented, regularly reviewed, and communicated to relevant parties. These policies align with KSEF's values and comply with legal and regulatory requirements.

The policies in place are:

1. Bursary Admission Policy:
2. Financial Assessment Policy
3. Equal Opportunities Policy
4. Awarding Policy
5. Renewal Policy
6. Governance Policy
7. Bursary Administration Confidentiality Policy
8. Donation Acceptance Policy
9. Donor Privacy Policy
10. Ethical Fundraising Policy
11. Investment Policy
12. Complaints Policy
13. Conflicts of Interest Policy
14. Gift Acceptance Policy
15. Fraud Policy
16. Data Protection Policy
17. Review and Monitoring Policy
18. Community Outreach Grant Application Policy

Preamble

Knightsbridge School Education Foundation (“**KSEF**”) provides scholarships and bursaries to talented pupils whose family financial circumstances would not otherwise enable them to attend Knightsbridge School (“**KS**”) or, where applicable, another school, selected by KS and approved by KSEF.

Established in 2007, KSEF is a registered charity (charity number **1120970**) and is subject to the regulation of the Charity Commission for England and Wales. It works closely with, but is entirely independent from, KS. KSEF's objectives are the furtherance of education through KS and to promote such other activities connected to the advancement of education which are charitable.

In particular, our aims are, in accordance with these policies, to:

- Provide scholarships and bursaries to talented pupils whose family financial circumstances would not otherwise enable them to attend fee-paying private schools, or non-fee-paying schools where other aspect of the education (e.g. fee for accommodation) would prevent the student from being able to attend.
- Provide a degree of financial support to local state schools in accordance with their needs.

We will periodically review our activities to ensure we respond to the evolving nature of current needs.

For the avoidance of doubt, all references to “parent” are intended to be a reference to parents, carers and guardians.

1. Bursary Admission Policy

Policy summary – this policy outlines the eligibility criteria for bursary applicants, the application process, selection procedures, the size and scope of bursaries and the responsibilities of recipients.

1.1. Introduction

KSEF offers bursaries worth up to 100% fees for a pupil to attend KS or another school selected by KS and approved by KSEF. In some cases, bursaries may cover additional educational expenses (e.g. music lessons, uniforms, school trips, accommodation in case of boarding schools).

Bursary awards will vary depending on the applicant's needs and funds available.

1.2 Eligibility criteria and other factors to consider:

- i.) Preference is given to applicants who come from the Royal Borough of Kensington and Chelsea, though applicants from outside this borough may also receive the award.
- ii.) A bursary will not usually be available to a candidate currently at an independent school unless they receive a substantial means-tested bursary to attend that school.
- iii.) The candidate applying for a bursary (or bursary renewal) must have the right to live and study in the UK.
- iv.) The applicant must demonstrate a genuine financial need as set out below, and in the Financial Assessment Policy.
- v.) The applicant must have a good academic and behavioural standing.

1.3 Application process:

Applications for bursaries can be made by parents.

The applicant shall:

- i.) Contact the relevant school to book a school visit to take place at the beginning of the autumn term of year 6. During this visit, the applicant or their parents shall express an interest in the bursary programme provided by KSEF. The registration fee for the school place is waived for those applicants who mention an interest in the KSEF bursary programme during the visit.
- ii.) Request a Bursary Application Link from the school office;
- iii.) Complete the application form online in full and attach all required supporting documents;
- iv.) Submit the application by the specified deadline;
- v.) Complete relevant exam(s) and participate in the interview process.

1.4 Selection Process:

The Bursary Committee, working together with the school, will award the bursary on the basis of:

- Student suitability as assessed by the following:
 - o Performance in the English, Maths, and non-verbal IQ tests by the applicant.
 - o Performance in the interview process.

- Overall demonstration of the applicant's ability to thrive at KS.
- Financial need (as assessed by the Means Test Form):
 - The amount of bursary is determined based by financial need and is assessed individually owing to the myriad of circumstances families may present with when applying for a bursary.
- Other factors that may be considered (this is a non-exhaustive list):
 - Any prior bursary support received from a previous school or having previously attended a state sector primary school.
 - Instances where the applicant's parent(s) has/have support needs.

1.5. Responsibility of recipient:

Bursary recipients are expected to:

- i.) Maintain a satisfactory academic record;
- ii.) Uphold the school's code of conduct and behavior policy;
- iii.) Update financial information on the school's platform;
- iv.) Where the bursary recipient moves to higher education, inform KSEF about the name of the higher education institution and the course that the bursary recipient has chosen.

2. Financial Assessment Policy

Policy Summary – this policy outlines KSEF's approach for assessing the financial need of applicants, using a third-party assessor. It includes details of how financial information will be evaluated and the criteria for determining the level of support.

2.1 Introduction:

The purpose of this policy is to ensure that bursary funds are allocated in a manner that is transparent and equitable, to students who demonstrate outstanding academic skills and also a need for financial support.

2.2. Application process:

The families will complete and submit a Financial Assessment Form, which will be assessed by a professional third-party assessor, selected by KSEF.

2.3 Assessment criteria:

The following information is assessed:

- i.) The total income and expenditure of the family;
- ii.) Assets of the family;
- iii.) Liabilities of the family (e.g. loans);
- iv.) Other relevant circumstances such as number of dependents in the family, medical expenses, or unemployment, will be taken into account.

The following are likely to be incompatible with the award of a bursary:

- Where one or more of the parents are under-employed and it is out of choice (i.e. they are working part-time because of choice not because they need to look after younger children or have health limitations).
- Possibility of releasing equity from significant savings/investments or secondary properties (not main residence).
- Purchases which are considered "extravagant" such as frequent holidays, new/luxury cars or substantial/costly investments in home improvements. These will, however, still require a degree of discretion as it is possible that expensive home improvements may be required to meet the adaptation needs of an individual.

In all cases KSEF and/or its third-party assessor reserve the right to request an interview or home visit to establish the financial circumstances of the family applying for a bursary.

2.4 Assessment Review Process:

As a standard practice, financial assessments will be reviewed every two years by KSEF's third-party assessor. However, where a family's financial situation changes significantly, more frequent reviews may be warranted.

Parents are required to inform KSEF of any such changes as soon as possible.

3. Equal opportunities policy

Policy summary – this policy sets out that KSEF seeks to avoid any bias when making decisions in relation to the awarding of bursaries.

All bursaries awarded through KSEF are awarded regardless of the racial, religious, gender, disability background of the applicants and their families. The application forms seek to be as neutral as possible so as to avoid any unconscious bias during the application or awarding stages, consequently it does not ask about the racial or religious backgrounds of the applicant nor their gender or disability status.

Notwithstanding the above, there may be instances where the disability status of an applicant's parent is relevant to their employment status or financial circumstances. Such instances will be dealt with the utmost sensitivity.

It is acknowledged that there is some inherent assessment of socioeconomic background as part of the bursary process (owing to its objective to allow those from lower socioeconomic backgrounds to access a fee-paying independent school or another non-fee-paying school that would be inaccessible for the student for other reasons than fees). Nevertheless, the information gathered is intended to be used solely for calculating family need. Additionally, all information collected is held in accordance with the Confidentiality and Data Protection Policies.

4. Awarding Policy

Policy summary – this policy details how and when bursary funds will be disbursed including any conditions attached to the awarding of funds.

4.1 Introduction:

The bursaries shall be awarded in accordance with the Financial Assessment and the Bursary Admission Policies.

Funds shall be paid directly by KSEF to KS, or to other schools approved by KSEF as applicable, in advance of the termly invoice being due. Where the bursary does not cover 100% of the fees, the difference shall be paid by the parents or any other relevant financial sponsor directly to the school.

4.2 Conditions of receiving award:

Additional conditions, which apply beyond the conditions as set out in the Financial Assessment and the Bursary Admission Policies, are:

- i.) Compliance with the Terms and Conditions of the relevant school (be it KS or another school, as is applicable).
- ii.) Parents must ensure that any fees for which they are liable are paid in a timely manner, directly to KS, or the other school approved by KSEF, as applicable.
- iii.) Pupils in receipt of the bursary must maintain satisfactory academic progress.
- iv.) The behaviour of the pupil must meet the relevant school's behaviour policy, and the attendance of the pupil must meet the relevant school's attendance policy.
- v.) Pupils in receipt of the bursary are expected to contribute positively to the life of KS or another school approved by KS, as applicable, and be a good example to other pupils.
- vi.) KS, or another school approved by KSEF, as applicable, shall provide feedback to KSEF about the student's academic performance, attendance and behaviour on an annual basis. Notwithstanding this Clause 4.2(vi), KSEF shall be eligible to request more frequent feedback where it sees fit.
- vii.) Bursary applicants shall commit to inform KSEF of the university and course they choose to attend after leaving KS or another school as applicable.

Non-compliance with the above conditions by either the student or their parent may result in the withdrawal of the bursary.

4.3 Award review:

The Bursaries are subject to a review assessment every 2 years (see the Renewal Policy) and the level of support may be increased or decreased (or even withdrawn) based on the assessment. Parents are subject to an ongoing duty of disclosure in respect of any changes of circumstance throughout the year and this will trigger a re-assessment even if it is not at the time of year when the renewal process typically occurs. Changes in circumstances which should be notified to KSEF include but are not limited to:

- Inheritance or other large lump sum received (eg. payment from an insurance policy).
- 6% or more increase in household income

- Other children in the family no longer attending fee-paying school or commencing school (such that a parent who was at home can now work).
- The unemployment/ill-health incapacity of one or both of the parents or a sibling.
- A parent taking maternity/paternity/adoption leave which results in a reduction in their salary.

4.4 Record-keeping:

Following the awarding of a bursary, accurate records of the awarding decision and the disbursement of the award will be maintained for audit and review purposes.

5. Renewal policy

Policy summary - This policy outlines the process for renewing a pupil's bursary.

5.1 Introduction:

All bursaries are subject to review every two years (except where the student would be departing secondary education at the end of the current academic year). Such reviews involve:

- i.) Reviewing the parents' means, which review is conducted by a third-party financial assessor engaged by KSEF;
- ii.) Reviewing the student's academic and behavioral performance, which review is conducted by KS or another school approved by KS, as applicable, and the outcome of the review is further checked by KSEF; and
- iii.) Additionally, KSEF may, at any time, review any other relevant changes in the circumstances of the student which might affect the student's financial needs.

Such review may result in a bursary being varied so as to increase or decrease the award (subject to a cap of 100% remission of fees).

5.2 Renewal process:

i.) Reapplication:

- Where parents' circumstances have not changed, they must complete a signed form declaring that their financial circumstances have not changed since the last financial assessment.
- Where parents/carers' circumstances have changed they must complete a new financial assessment.
- The relevant forms will be supplied to the parents at the beginning of every other spring term (i.e. early January) and must be completed and returned by February Half Term.

ii.) Assessment: The Bursary Committee will reassess financial need and review academic performance and conduct.

iii.) Notification: The results will be shared with parents by the end of the spring term (before the break for the Easter holidays).

5.3 Obligations of recipient:

Compliance with the Awarding Policy will be considered during the renewal process. Noncompliance with the Awarding Policy may result in a bursary award not being renewed.

6. Governance policy

Policy summary - This policy includes the structure of the bursary committee, defines other roles and responsibilities, and how KSEF will make decisions in respect of the charity.

6.1 Structure:

- Bursary Committee
- Appeals Panel
- Data protection representative/officer

6.2 Bursary Committee:

The Bursary Committee is responsible for the strategic management of the bursary program. It makes decisions regarding policy development and bursary awards.

Roles and Responsibilities:

- Chairperson: Provides leadership to the Committee, ensuring its effectiveness in all aspects of its role.
- Treasurer: Oversees the financial management of the bursary fund, including budgeting and financial reporting.
- Secretary: Manages the administration of meetings, including scheduling, agendas, and minutes. The Secretary can be an employee of KS rather than a Trustee of KSEF.
- Members: Contribute to decision-making and policy development, bringing diverse perspectives and expertise.

Meetings:

- The Bursary Committee shall meet at least once every half term, online or in person, to review applications, monitor fund distribution, discuss fundraising initiatives and discuss policy matters. Special meetings may be called as necessary to address urgent issues.
- During these meetings the Bursary Committee shall make decisions in accordance with KSEF's Constitution.

Transparency and Accountability:

- In line with KSEF's Constitution, the Bursary Committee shall maintain accurate and complete records of all its meetings, decisions and financial transactions.
- An annual report summarizing the activities and decisions of the bursary programme shall be prepared and made available to stakeholders annually.

6.3. Appeals Panel:

The Appeals Panel is responsible for reviewing the Bursary Committee's decisions in cases where a complaint has been made in relation to such decisions..

The Appeals Panel shall consist of members of the Bursary Committee, and at any time, shall at least have two members.

6.4 Conflicts of interest:

Members of the Bursary Committee and the Appeals Panel must declare any conflicts of interest in relation to bursary applications, in accordance with KSEF's Conflicts of Interest Policy.

7. Bursary Administration Confidentiality Policy

Policy summary - This policy outlines KSEF's approach to managing the confidentiality surrounding the application for and administration of bursaries. It is acknowledged by KSEF that financial circumstances and bursary administration are highly sensitive topics, and such information will be handled with the utmost care.

7.1 Introduction:

KSEF will collect highly sensitive data from parents and applicants to assess bursary applications. This policy ensures that such data is kept confidential.

The Bursary Committee and any individual within KSEF with access to such sensitive information is responsible for upholding this policy

7.2 Data storage and use:

All sensitive information related to bursary applications shall:

- i.) only be used for assessing bursary eligibility;
- ii.) be kept confidential, stored securely with access restricted to authorized personnel only; and
- iii.) be protected against unauthorised access and disclosure.

7.3 Data:

This policy shall be applicable to all information received by KSEF related to bursary applications, including but not limited to financial data, health data, personal identification details, and family circumstances.

7.4 Application:

- i.) KSEF will not advertise the recipients of bursaries.
- ii.) Recipients and/or their parents may be asked to contribute material for KSEF's website or marketing material. However, this may remain anonymised where requested and consent will always be sought before publication.
- iii.) Recipients of bursaries may be asked to make a testimony, or speak at KSEF and KS events. However, this will always be subject to the consent of their parents or carers.
- iv.) In some instances, donors may request an update as a condition of their gift. Where this occurs, anonymised updates will be supplied to the donors. Additionally, where this applies KSEF will make the parent aware at the time the award is made.
- v.) Upon joining KS (or another school with the assistance of the award) a number of staff members at the school may need to be made aware of the fact that a pupil is a recipient of a bursary. The purpose of this disclosure is due to the fact that there may be associated pastoral needs required. These staff members will not be made aware of the family's financial needs, or the amount of award granted (only that the child receives a bursary).

KSEF acknowledges that in some instances the parents/carers of the applicant will be separated or divorced. As it is an option for separate Means Test Forms to be submitted by each parent, KSEF will not disclose the information supplied in such forms to the other parent without first seeking the express consent of the individual who has completed the form.

12. Complaints policy

Policy summary – This policy provides a clear process for handling complaints related to the bursary program, whether from applicants, recipients, or other stakeholders.

12.1 Introduction:

In instances where the applicant, recipient or other stakeholder has a concern about how their bursary application was handled, this Complaints Policy applies.

KSEF will maintain a Complaints Register in furtherance of the Complaints Policy and procedure.

This policy relates to the administration of the bursary program, and therefore does not apply to:

- the reporting of fraud or suspected fraud (please see the appropriate Fraud Policy).
- any complaint about KS or any other school a child is placed at with the support of a KSEF bursary.
- individual awarding decisions unless the complaint concerns an (alleged) breach of procedure.

12.2 Complaints procedure:

i). Receipt of the Complaint

- Complaints shall be emailed to info@ksfoundation.org or received by post at Knightsbridge School Education Foundation, 67 Pont Street, London SW1X 0BD.
- The Appeals Panel will log the complaint on the Complaints Register.
- The Complaints Manager will assess whether the complaint falls within the Complaints Policy.
- Within 30 working days of receipt of the complaint, the Appeals Panel will either acknowledge receipt of the complaint and its acceptance or respond, noting that the matter falls outside the Complaints Policy. The Appeals Panel may refer the complainant to be considered under another KSEF policy, if appropriate, (such as the Donor Privacy Policy).
- The response will be made to the complainant by the communication method in which the complaint was received.
- Where the complaint falls within this policy, the Appeals Panel or their delegate will, within 10 working days of receipt of the complaint, make the Chair of KSEF aware.

ii). Investigation

- The Appeals Panel will consider the full evidence of the complaint and investigate as appropriate and will in consultation with the Chair of KSEF recommend one of the following courses of action:
 - A) that the complaint is not justified and should be rejected;
 - B) that the complaint is justified or partially justified and agree the outcomes of the complaint.

- If the complaint is upheld, all or in part, then the Chair of KSEF will consider what actions, if any, will be taken.

12.3 Communication of Decision

The Chair or their delegate shall inform the person making the complaint. If the complaint was against an individual, the party against whom the complaint was made shall also be informed within 10 working days of the decision reached on the complaint.

12.4 Appeals

Any appeal must be submitted in writing within 14 days of the decision. Appeals must be submitted to info@ksfoundation.org

The Chair of KSEF will acknowledge receipt of the appeal within 10 working days of receipt.

12.5 Reporting

The details and outcome of the complaint will be recorded in the Complaints Register.

A summary of the Complaints Register will be tabled at the Annual Summer Meeting (ASM) of the trustees. The tabled summary will maintain the confidentiality of both those who have submitted formal complaints and those who were the subject of complaints as far as may be practical. Where appropriate, changes in policy or practice resulting from any complaint will also be recorded in the minutes of the ASM. Information from the Complaints Register may be used to inform decisions taken under the Review and Monitoring Policy.

12.6 Monitoring and Learning

Complaints will be monitored to identify any trends or systemic issues.

The Trustee Board will review this data annually to improve the bursary program's processes and policies.

15. Fraud Policy

Policy summary – this policy explains how KSEF will prevent and report fraudulent activity within the bursary application process.

15.1 Introduction:

KSEF is committed to the prevention of fraud and the promotion of an anti-fraud culture.

Where trustees of KSEF notice anything unusual in respect of bursary application that could indicate fraudulent activity, the trustees will be responsible for looking into, and where necessary, reporting the actual, attempted or suspected fraudulent activity to Action Fraud.

15.2 Definition of fraud:

Fraud is the act of gaining a dishonest advantage, often financial, over another person. Multiple fraud offences are specified in Fraud Act 2006, including:

- Fraud by false representation (section 2)
- Fraud by failing to disclose information (section 3)
- Fraud by abuse of position (section 4).

15.3 Reporting suspicions:

Those suspecting actual, attempted or suspected fraud should report their concerns in the first instance to the Chair of KSEF.

Individuals should not attempt to investigate any fraud themselves.

15.4 Response to fraud:

With the Chair's leadership, the Trustees of KSEF will investigate and produce a report on the evidence gathered within 21 working days (unless precluded from doing so by some reason beyond their control). The Chair of the Trustees will make a decision within 7 days after receiving the finalised report, as to whether the attempted or actual fraudulent activity should be reported to Action Fraud.

If evidence comes to light that the information supplied is misleading, dishonest, or fraudulent (including the intentional omission of relevant information) then KSEF reserves the right to amend or stop future payments and recover from the parents any payments already made to the student. Recovery of losses should be sought in all cases in accordance with the Trustees' duties to manage charitable funds.

15.5 Protection of those reporting fraud suspicion

Individuals who report suspected fraud in good faith shall be protected from retaliation and their confidentiality shall be maintained to the fullest extent possible.

16. Data Protection Policy

Policy summary – this policy explains how KSEF will comply with GDPR and other relevant data protection law and how KSEF will safeguard personal data of applicants, recipients and donors.

16.1 Introduction:

KSEF acknowledges that in the administration of its bursary program it is likely to hold and process personal data. KSEF is committed to protecting the personal data of its stakeholders and fulfilling its obligations under UK data protection legislation. This policy sets out KSEF's commitment to data protection and how we comply with the key legislation.

The policy applies to all individuals whose personal data is processed by KSEF including:

- trustees
- staff, contractors and volunteers
- donors and fundraisers
- beneficiaries and applicants for bursaries
- visitors to our website

This policy applies to all personal data held on a filing system by KSEF regardless of whether it is in paper or electronic format. This policy covers all activities of KSEF where personal data is controlled or processed as defined by the Data Protection Act 2018 regardless of the geographical location of the person processing the data.

16.2 Key definitions

Term	Definition
Personal data	Any information relating to an identified, or identifiable, individual. Examples include a name or unique reference number. It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural, or social identity.

Special categories of personal data	<p>Personal data which is more sensitive in nature and therefore needs more protection. This can typically be categorised into information about an individual's:</p> <ul style="list-style-type: none"> – Racial or ethnic origin – Political opinions – Religious or philosophical beliefs – Trade union membership – Genetics – Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes – Health – physical or mental – Sex life or sexual orientation & gender
Processing	<p>The lifecycle of personal data / what an organisation does with that data including:</p> <ul style="list-style-type: none"> – Collection – Recording – Organising – Storing – Adapting / Altering – Retrieving – Using – Erasing / Destroying <p>Processing can be automated or manual.</p>
Data subject	<p>The lifecycle of personal data / what an organisation does with that data including:</p> <ul style="list-style-type: none"> – Collection – Recording – Organising – Storing – Adapting / Altering – Retrieving – Using – Erasing / Destroying <p>Processing can be automated or manual.</p>
Data controller	<p>A person or organisation that determines the purposes and the means of processing of personal data.</p>
Data processor	<p>A third party who processes personal data on behalf of the data controller. Examples include contractors and suppliers of services.</p>

Personal data breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.
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16.3 Data Controller

KSEF is the Data Controller for all personal data processed by the charity which means that KSEF is ultimately responsible for how that data is processed and KSEF makes decisions related to it.

KSEF is registered with the ICO with registration number: ZA553185.

16.4 Responsibilities

The board of trustees hold the overall responsibility for data protection compliance within the charity and will make any key decisions regarding the processing of personal data.

The charity has appointed an individual responsible for data protection within the organisation. George Oliver is the data protection representative¹ (DPR) for the charity and will be responsible for the day-to-day implementation of policies and procedures. The DPR is the first point of call for the charity for any questions related to this policy or data protection and can be contacted using the following details:

Telephone no 020 7590 9000 (ask for George Oliver, DPR for KSEF, to return your call)

Email address info@ksfoundation.org attn: George Oliver, DPR for KSEF

All staff, contractors and volunteers working on behalf of KSEF have a responsibility to comply with this policy when processing personal data. We also ask that individuals inform us of any changes to their own personal data such as changes in address to ensure our records are accurate.

In addition, KSEF asks that all individuals working on behalf of KSEF notify the charity without undue delay if one or more of the following circumstances occur:

- There are concerns that this policy is not being followed
- They are unsure if they have a lawful basis to process personal data in a particular way or are uncertain whether to seek consent or not
- They receive a request relating to the rights of individuals under the UK-GDPR
- They wish to transfer data outside of the United Kingdom
- There has been a data breach

KSEF ensures that all individuals working with the charity understand their obligations and the charities commitments to keeping data secure. Staff who do not comply with this policy may face disciplinary action.

16.5 Data protection principles

The UK-GDPR outlines six key principles that all organisations must comply with. Below, KSEF outlines its commitments whereby:

- Personal data will be processed lawfully, fairly and in a transparent manner: The charity will only process personal data if it has one of the 6 lawful bases to do so under data protection law. KSEF currently rely upon one of the following:
 - i. The data needs to be processed so that the charity can **fulfil a contract** with the individual.
 - ii. The data needs to be processed so that the charity can **comply with a legal obligation**
 - iii. The data needs to be processed to ensure the **vital interests** of the individual e.g., to protect someone's life

¹ Also known as a Data Protection Officer

- iv. The data needs to be processed for the **legitimate interests** of the charity or a third party (provided the individual's rights and freedoms are not overridden)
- v. The individual has freely given clear **consent**.

The charity does not currently process special categories of personal data. Should this change, this policy will be updated to incorporate the additional conditions that KSEF needs to meet from the UK-GDPR and DPA.

Where consent is applicable, all individuals are informed of their right to withdraw consent and provided with instructions on how to do so.

- Personal data will be collected for specified, explicit and legitimate purposes only.
- The charity processes personal data only where it is adequate, relevant and limited to what is necessary for the purposes of processing.
- All personal data processed will be kept accurate and up to date; individuals have a right to rectify any incorrect personal data.
- Personal data is kept for only as long as necessary to fulfil the purpose it was collected for; and a process is in place to review and dispose of any personal data that is no longer required.
- The charity adopts appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction, or damage.

16.6 Accountability

The UK-GDPR sets 'accountability' as the overarching principle that binds together the 6 key principles outlined above. Organisations should be able to effectively demonstrate compliance with the key principles of the UK-GDPR.

How KSEF complies with the key principles of the UK-GDPR and demonstrate accountability

KSEF has compiled a 'Record of Processing Activities' containing an inventory of the personal data that KSEF processes. This forms the basis of KSEF's data protection strategy and outlines the following information:

- i. The categories of personal data that KSEF processes
- ii. The data subjects concerned
- iii. The purpose for processing
- iv. The lawful bases for processing
- v. Third party data processors if applicable & details of international transfers
- vi. Technical security measures in place to protect that data
- vii. Retention period of each category of data.

An annual check is performed by KSEF on all personal data held within filing systems to ensure it is not kept for longer than necessary. Data is securely shredded or deleted if electronic in line with this policy.

Procedures have been put in place to cover the rights of individuals set out in the UK-GDPR; logs are also in place to record any information requests. Similarly, the charity has put measures in place outlining steps in the event of a data breach along with a log to record all breaches. Logs are reviewed on an annual basis to assess any areas for improvement.

All electronic systems are password protected, whilst paper documentation is kept safely.

16.7 Rights of Individuals

Individuals have several rights in relation to their personal data under the UK-GDPR which are outlined below along with the process the charity will follow to effectively meet those rights:

Right of Access

Commonly referred to as a 'Subject Access Request' (SAR); individuals have a right to gain access to the personal data that an organisation processes about them. Individuals have a right to ask the following:

- i. Confirmation that the charity processes their personal data
- ii. The categories of personal data processed
- iii. The purpose of the processing
- iv. Whether it is shared with any third parties
- v. The source of the data (if not the individual)
- vi. How long the data will be stored, or the criteria used to determine this period
- vii. Access to a copy of their personal data that is held by KSEF
- viii. Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual

KSEF asks that all SAR's are submitted in writing either by letter or email to the charity's representative for data protection. Requests should include:

- i. Name of individual
 - ii. Correspondence address
 - iii. Contact number and email address
 - iv. Details of the information requested
- Any individual employed in a working capacity for the charity that receives a request for personal information, no matter the method or format should forward it immediately to the charity's DPR. The charity reserves the right to verify the identity of the individual making the request.

Other data protection rights of individuals

Individuals have the right to:

- i. Withdraw their consent to the processing of personal data where consent is the lawful basis for processing.
- ii. Ask KSEF to rectify inaccurate data.
- iii. Ask KSEF to restrict processing or erase data that is no longer necessary for the purposes of processing.
- iv. Ask KSEF to restrict processing or erase data if the individual's interests override the charity's legitimate grounds for processing data (where KSEF relies on its legitimate interests as a reason for processing data).
- v. Be notified of a data breach in certain circumstances.
- vi. Request a copy of agreements under which their personal data is transferred outside of the United Kingdom
- vii. Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect them)
- viii. Ask for their personal data to be transferred to a third party in a structured, commonly used, and machine-readable format (in certain circumstances)

Individuals that wish to exercise any of these rights should do so in writing or contact KSEF using the following details:

KSEF

67 Pont Street, London SW1X 0BD

Telephone no 0207 590 9000

Email address info@ksfoundation.org

A response to all requests will be provided within one calendar month unless the request is deemed complex, in which case a two-calendar month extension may apply. The charity will however inform individuals within one calendar month of any extensions.

All responses will include a cover letter outlining whether the charity has been able to fulfil the request in full, part or not at all. Explanations will be provided if the charity is unable to meet any part of a request. Manifestly unfounded or excessive requests may be refused.

If an individual is unhappy with how the charity has dealt with a request, we ask that they contact us in the first instance so that we can help resolve their complaint. Individuals also have a right to complain to the ICO using the following details: <https://ico.org.uk/make-a-complaint/data-protection-complaints/>

16.8 Images

As part of KSEF's fundraising activities, KSEF uses images of individuals with their consent; images include photographs and videos.

The charity will gain written consent for the use of all images, and will clearly outline how and why the image(s) will be used and if they will be shared on any third-party platforms including social media, the charity or partner websites or on printed publications.

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the image and not distribute it further.

16.9 Data security and storage of records

KSEF will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing, or disclosure, and against accidental or unlawful loss, destruction or damage.

16.10 Disposal of records and data retention

Personal data that is no longer needed will be disposed of securely. Paper records will be shredded whilst electronic records will be overwritten or securely deleted.

For bursary applicants who are unsuccessful this will result in the secure disposal of all records 2 years after the appeal period has lapsed.

For applicants who are successful in obtaining a bursary this will result in the secure disposal of all records pertaining to the bursary awarding process (financials, interviews) 2 years after the student finishes receiving the bursary.

KSEF will transfer the following personal data from the student's bursary record when the student finishes studying to the student's alumni record:

- Name
- Contact details
- Details of the school the student attends after leaving KS, or another school approved by KS, as applicable

The student's alumni record will be retained indefinitely but KSEF will check with the alumni on a regular basis to ensure that information is kept up to date and the alumni may tell KSEF to remove their details from the alumni database at any time.

All other data shall be disposed of when it is no longer necessary.

For donors/benefactors, personal data will be disposed of once it is deemed to be no longer needed.

16.11 Personal Data Breaches

The UK GDPR requires Controllers to notify any Personal Data Breach that meets the risk of harm threshold (e.g. where a large-scale loss of special category data occurred, where the data breach is affecting vulnerable students; where the data breach might put an individual at risk) to the Information Commissioner and, in certain instances, the Data Subject.

KSEF has put in place procedures to deal with any suspected Personal Data Breach and will notify the Data Subject or any applicable regulator where we are legally required to do so.

In the unlikely event of a suspected data breach, we ask that individuals report to the DPR without undue delay so that the breach can be assessed accordingly.

Data breaches that are deemed reportable to the ICO will be reported within 72 hours and Data Subjects will be informed where necessary. The charity will report such data breaches to the ICO using the following link: <https://ico.org.uk/for-organisations/report-a-breach/personal-data-breach/>

Records of all data breaches will be kept as a point of reference and method of improving practices.

16.12 Monitoring arrangements

The DPR is responsible for monitoring and reviewing this policy.

This Data Protection Policy does not override any applicable national data privacy laws and regulations.

17. Review and monitoring policy

Policy summary - This policy outlines the monitoring and review process for administration of the bursary program.

17.1 Introduction

KSEF is committed to reviewing the administration of its bursary program on an annual basis to ensure the program is managed effectively, in alignment with KSEF's charitable object, and in line with its Policies.

17.2 Annual Review Procedure:

KSEF commits to hold an Annual Summer Meeting of the trustees, where the below points will be considered:

i.) A comprehensive assessment of the bursary program will be undertaken to review its performance and impact. This review will be conducted based upon:

- KSEF's financial performance that year;
- Feedback from parents and students;
- Any complaints received;
- Award amounts;
- Performance of bursary recipients.

ii.) A comprehensive financial audit will be undertaken to assess the financial performance of KSEF and that funds are being used appropriately and efficiently.

iii.) A compliance check will be conducted against relevant laws, regulations, and KSEF's Policies.

The trustees shall compile a report following the Annual Summer Meeting of the trustees, outlining findings, areas for improvement and recommendations made. Such report shall be implemented throughout the year and shall be considered on the next Annual Summer Meeting.

The Annual Summer Meeting of the Trustees shall be held in compliance with the 'Proceedings of the Board' and 'Powers of the Board' paragraphs of KSEF's constitution.

17.3 Annual review of KSEF Policies:

KSEF will review all policies, unless otherwise stated in the subject policy, on the ASM and more frequently where changes in applicable legislation or changes in circumstances require changes to be made to policies in the interim.

Updates/changes to policies shall be discussed and approved at the KSEF's Annual Summer Meeting of the trustees, unless the implementation of the updates requires more immediate attention, in which case the updated policy shall be discussed and approved in the interim.

Any significant changes and updates to Policies shall be communicated by KSEF to the relevant stakeholders.

17.4 Monitoring and implementation responsibility:

The trustees individually and as a collective are responsible for the preparation of, and the conducting of the Annual Summer Meeting. Following the Annual Summer Meeting, the trustees shall be responsible for implementing any recommendations agreed upon on the Meeting.

Notwithstanding the above, the trustees shall be able to delegate any of such responsibilities to a committee, in accordance with Article 50 of KSEF's constitution.