PRIVACY NOTICE

THE RGS NEWCASTLE GROUP OF SCHOOLS

RGS NEWCASTLE

Westfield SCHOOL

PRIVACY NOTICE

The RGS Newcastle Group of Schools

INTRODUCTION

This Privacy Notice explains how The RGS Group of Schools collects, uses, stores and protects personal data.

For the purpose of this notice, the RGS Group comprises of:

- The Royal Grammar School, Newcastle upon Tyne ("RGS Newcastle")
- Westfield School
- Any subsidiary company, charitable entity, trading company or associated organisation operating under the governance or control of the RGS Group from time to time.

References throughout this Privacy Notice to "the School", "the School's", "the RGS Group", "we", "our" or "us" mean the relevant member institution within the RGS Group that is collecting or processing personal data, or the RGS Group collectively where activities are carried out on a shared basis.

The RGS Group is committed to protecting the privacy and security of personal information and to processing personal data fairly, lawfully and transparently. We recognise the importance of safeguarding the personal information of our pupils, parents, staff, governors, volunteers, alumni, visitors and other members of our school communities.

This Privacy Notice sets out how we collect, use, share, retain and protect personal data in connection with the education, welfare and development of our pupils, the employment and support of our staff and the operation and management of our Schools and associated activities.

We process personal data in accordance with applicable data protection legislation, including the **UK General Data Protection Regulation (UK GDPR)**, **the Data Protection Act 2018**, the **Data (Use and Access) Act 2025** and relevant education, employment and safeguarding legislation and guidance.

In accordance with the Act, the school has notified the Information Commissioner's Office (ICO) of its data processing activities. The school's ICO registration number is Z5794887.

This Privacy Notice applies to all individuals whose personal data is processed by any organisation within the RGS Group, including prospective, current and former pupils and their families, staff, governors, volunteers, contractors, alumni, donors, visitors and anyone applying for a position at the School.

This policy also applies to the following related institutions:

(a) The RGS Educational Trust

(b) RGS Trading Ltd

(c) The Old Novocastrians' Association.

(d) Westfield School

(e) Westfield Nursery

Each school or subsidiary is the Data Controller for its own operations, while some services may be provided centrally across the RGS Group under appropriate data sharing and governance arrangements.

RESPONSIBILITY FOR DATA PROTECTION

The school and its associated bodies have appointed the Director of Finance & Operations as its Data Protection Officer (DPO) who will deal with all your requests and enquiries concerning the school's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law.

The Director of Finance & Operations may be contacted at:

The Royal Grammar School
Eskdale Terrace
Newcastle upon Tyne
NE2 4DX
dataprotection@rgs.newcastle.sch.uk
0191 281 5711

WHAT THIS PRIVACY NOTICE IS FOR

This policy is intended to provide information about how the school will use (or "process") personal data about individuals including: its staff; its current, past and prospective pupils; and their parents, carers or guardians (referred to in this policy as "parents").

Personal data means data that relates to a living individual who can be identified from those data or from those data and other information, which is in the possession of, or is likely to come into the possession of, the Data Controller. This includes information recorded as part of a relevant filing system, i.e. any data relating to individuals structured in such a way that specific information relating a particular individual is readily available.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, parents and pupils are all encouraged to read this Privacy Notice and understand the school's obligations to its entire community.

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

This **Privacy Notice** also applies in addition to the school's other relevant terms and conditions and policies, including:

- any contract between the school and its staff or the parents of pupils;
- the school's policy on taking, storing and using images of children;
- The RGS ARCHIVES POLICIES;
- the school's CCTV POLICY;
- the school's RETENTION OF RECORDS POLICY;
- the school's GDPR POLICY;
- the school's SAFEGUARDING, PASTORAL, OR HEALTH AND SAFETY POLICIES, including as to how concerns or incidents are recorded; and
- the school's IDT SERVICES POLICIES, including its ACCEPTABLE USE POLICIES, ESAFETY POLICY, JUNIOR SCHOOL COMPUTING POLICY and REMOTE WORKING POLICY.
- Anyone who works for, or acts on behalf of, the school (including staff, volunteers, Governors and service providers) should also be aware of and comply with this Privacy Notice and the school's GDPR- DATA PROTECTION POLICY, which also provides further information about how personal data about those individuals will be used.

HOW & WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to staff, pupils and parents, the school needs to process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of its daily operation.

Processing Activity	Categories of Personal Data Used	Individuals Affected	Lawful Basis
Admissions and pupil selection	Identity data, contact details, next of kin details, academic records, references, assessment results	Prospective pupils and parents	Legitimate Interests; Steps prior to entering into a contract
Verification of identity	Identification documents, passport details, contact information	Pupils, parents, staff, volunteers and contractors	Legal Obligation; Legitimate Interests
Provision of education and school services	Academic records, attendance records, behaviour records, SEND information, pastoral records	Pupils	Contract; Legitimate Interests
Remote learning and educational technology services	User accounts, learning records, assessment information, communications data	Pupils and staff	Contract; Legitimate Interests
Monitoring pupil progress and educational needs	Academic performance data, assessment results, SEND information	Pupils	Legitimate Interests; Legal Obligation (where applicable)
Pastoral support and pupil welfare	Welfare information, behavioural information, attendance data, safeguarding records and disciplinary records	Pupils	Legal Obligation; Vital Interests
Careers education and guidance	Educational records, destination information, references	Pupils	Legitimate Interests
Organisation of extracurricular activities, trips and events	Contact details, attendance information, health and dietary information where required	Pupils and parents	Legitimate Interests
Communication with parents and guardians	Contact details, pupil records, financial information where relevant	Parents and pupils	Contract; Legitimate Interests
Management of communication and correspondence	Emails, letters, parent communications and related correspondence records	Pupils, parents, staff, governors and visitors	Legitimate Interests; Legal Obligation
Alumni relations and community engagement	Contact details, attendance history, achievements and participation records	Former pupils and parents	Legitimate Interests
Fundraising and development activities	Contact details, donation history, publicly available information, due diligence information and anti-money laundering information	Alumni, donors and supporters	Legitimate Interests

Donor due diligence and anti-money laundering checks	Identity information, publicly available information, financial and reputational information	Donors and prospective donors	Legal Obligation; Legitimate Interests
Research, planning and statistical analysis	Aggregated and individual data relating to admissions, finances, fees, diversity and school operations	Pupils, parents and staff	Legitimate Interests; Legal Obligation
Regulatory reporting and inspections	Educational, attendance, safeguarding and workforce information	Pupils and staff	Legal Obligation
References and educational transfers	Academic records, attendance records, behaviour information, fee status	Current, former and prospective pupils	Legitimate Interests
Provision of references to employers, universities or other schools	Educational and character information	Former pupils and staff	Legitimate Interests
Public examinations and assessments	Personal identifiers, assessment records, examination entries, examination scripts, coursework and examination results.	Pupils	Legal Obligation
Publication of examination results and achievements	Name, year group, examination results, awards and achievements	Pupils	Legitimate Interests
Safeguarding and child protection	Safeguarding records, welfare information, relevant health information and external agency reports	Pupils	Legal Obligation; Vital Interests
IT security, filtering and monitoring	Device data, email records, internet usage, network logs and audit information	Pupils, staff and visitors	Legal Obligation; Legitimate Interests
Photography, video recording and marketing communications	Photographic images, video recordings and pupil participation information	Pupils, parents, staff and visitors	Consent where required; Legitimate Interests
CCTV operation and site security	Images, vehicle information and access records	Pupils, parents, staff and visitors	Legitimate Interests
Immigration compliance and sponsorship duties	Passport data, visa information, right-to-work information	Staff and sponsored individuals	Legal Obligation
Recruitment, employment and workforce management	Application forms, CVs, personnel files, qualifications, references, DBS information, payroll records, pension information, sickness records and disciplinary records	Job applicants	Legitimate Interests; Contract; Legal Obligation
Equality monitoring	Diversity, equality and inclusion data	Staff, applicants and pupils	Legal Obligation
Archives and historical	Records of enduring historical	Former pupils,	Public Interest

records	significance	staff and governors	Archiving
Management of complaints, grievances, disciplinary matters and investigations	Correspondence, investigation records, witness statements and reports	Pupils, parents, staff and governors	Legal Obligation; Legitimate Interests
Obtaining professional advice and insurance	Relevant personal information relating to claims, disputes or risks	Pupils, parents, staff and governors	Legitimate Interests; Legal Obligation
Management of school parking, site access and security	Vehicle registration details, contact details, visitor records, CCTV footage	Staff, parents, visitors and contractors	Legitimate Interests

Special Category Personal Data and Criminal Records Data

Processing Activity	Special Category Data Used	Individuals Affected	Lawful Basis
Safeguarding, welfare and pastoral care	Health information, safeguarding records, ethnicity, religion where relevant	Pupils	Legal Obligation; Vital Interests
Medical care and emergency response	Medical conditions, allergies, medications, dietary requirements	Pupils, staff	Vital Interests; Health and Social Care; Legal Obligation
Educational provision for pupils with SEND	SEND records, educational psychology reports, health information	Pupils	Legal Obligation
Public health management and communicable disease control	Health information and test results where applicable	Pupils	Legal Obligation; Public Health
Fee collection, bursary administration and financial management	Contact details, bank account details, payment records, financial circumstances, bursary applications, anti-money laundering information	Pupil, parents and donors	Contract; Legal Obligation; Legitimate Interests
Employment administration	Health records, occupational health reports, trade union membership, pension information	Staff	Employment Law Obligations
Safer recruitment and DBS checking	Criminal conviction and DBS information	Staff	Legal Obligation; Substantial Public Interest
Complaints, investigations and disciplinary processes	Safeguarding information, health information and other sensitive data as necessary	Pupils, staff	Legal Obligation; Substantial Public Interest
Health and safety compliance	Accident records, medical information and risk assessments	Pupils, staff, visitors	Legal Obligation
Equality, diversity and inclusion monitoring	Ethnicity, religion, disability and other diversity information	Pupils, staff	Legal Obligation; Substantial Public Interest

Full details of applicable retention periods can be found in the School's RECORDS RETENTION SCHEDULE. Retention periods vary according to the nature of the record, applicable statutory guidance, safeguarding requirements and legal obligations.

HOW THE SCHOOL COLLECTS DATA

Generally, the school 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 written assessments).

However, in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities working with that individual); or collected from publicly available resources.

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

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

- appropriate contractors, such as visiting music teachers;
- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- government authorities (e.g. HMRC, DfE, police or the local authority);
- appropriate regulatory bodies (e.g. Teaching Regulation Agency (TRA), the Independent Schools Inspectorate, the Charity Commission, the Pensions Regulator or the Information Commissioner);
- examination boards and awarding organisations (e.g. OCR, JCQ);
- Stage 3 complaints panels, which will include independent panel members;
- to agents contracted for specific school related projects (e.g. online resources such as Office 365, SOCS, Evolve);
- to baseline data and value-added assessment providers (e.g. CEM, GLA, ALPS, Hodder etc);
- The School may share personal data with banks, payment service providers, bursary assessment providers and other organisations involved in the administration of school fees and financial assistance.
- The RGS Support Staff Pension Plan; and
- the Old Novocastrians' Association.

For the most part, personal data collected by the school will remain within the school, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records, held and accessed only by authorised staff with a legitimate need to know in order to fulfil their safeguarding, pastoral, welfare or health and safety responsibilities, or otherwise in accordance with express consent; and
- pastoral or safeguarding files.

However, a certain amount of any SEND pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

Staff, pupils and parents are reminded that the School is under duties imposed by law and statutory guidance (including KEEPING CHILDREN SAFE IN EDUCATION) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or

safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please view the school's SAFEGUARDING POLICY.

Finally, in accordance with Data Protection Law, to support safeguarding, cyber security and compliance with legal obligations, the School may monitor and record use of:

- School devices;
- School networks;
- Internet services;
- Email systems;
- Collaboration platforms;
- Cloud services

Monitoring may include filtering inappropriate content, detecting cyber threats, safeguarding concerns, misuse of systems and legal compliance activity. Monitoring may take place whether users are accessing systems from School premises or remotely.

The School uses carefully selected third-party service providers. These may include providers of Management Information Systems (MIS), learning platforms, safeguarding systems, payment services, IT support, cloud hosting, communications, website services, educational applications and professional advisers.

Some of the School's service providers may store or process personal data outside the United Kingdom. Where this occurs, the School will ensure that such transfers are subject to appropriate safeguards, including adequacy regulations, International Data Transfer Agreements (IDTAs) or other legally recognised transfer mechanisms. The School undertakes appropriate due diligence to ensure that personal data receives an equivalent level of protection wherever it is processed.

AUTOMATED DECISION MAKING and USE of ARTIFICIAL INTELLIGENCE

The School does not make decisions about pupils, parents, staff, applicants or other members of the school community based solely on automated processing where those decisions would have a legal or similarly significant impact on the individual.

The School may use technology, data analytics or artificial intelligence (AI) tools to support educational provision, administrative activities, resource planning, safeguarding, cyber security monitoring and operational efficiency. However, any significant decisions affecting an individual will involve appropriate human oversight and review.

The School does not input special category personal data into publicly available generative AI services unless appropriate safeguards have been implemented.

Where the School introduces any process involving solely automated decision-making that has a legal or similarly significant effect on an individual, we will update this Privacy Notice and inform affected individuals of their rights under data protection legislation.

HOW LONG WE KEEP PERSONAL DATA

The school will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary staff and pupil personnel files is up to 7 years following departure from the school. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. Details of the school's RECORDS RETENTION PROCEDURE & SCHEDULE is available on the school website.

If you have any specific queries about how our retention policy is applied or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Director of Finance & Operations. However, please bear in mind that the school will often have lawful and necessary reasons to hold on to some personal data **even following such a request**.

A limited and reasonable amount of information will be kept for archiving purposes for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

Further details on the school's records retention policy can be found in RGS RECORDS RETENTION PROCEDURE & SCHEDULE.

KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The school and the related institutions mentioned above will use the contact details of parents, alumni and other members of the school community to keep them updated about the activities of the school, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the school will 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 Novocastrians' Association and Junior Family Group;
- contact parents and/or alumni, including via the organisations above, by post and email in order to promote and raise funds for the school and, where appropriate, other worthy causes;
- should you wish to limit or object to any such use, or would like further information about them, please contact the Director of Finance & Operations in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the school is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

YOUR RIGHTS OF ACCESS

If we process personal data about you, you have a number of rights in respect of that data. Subject to certain exemptions and limitations specified by law, you can:

- obtain access to, and copies of, the personal data that we hold about you;
- 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.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. We will respond to such requests as soon as is reasonably practicable and in any event within the time limits permitted by law which is typically one month but may be extended if your request is complex. We will let the individual know within one month of receiving their request explaining why the extension is necessary.

The School will be better able to respond quickly to smaller, targeted requests for information. In circumstances where we consider a request to be manifestly unfounded or excessive and data protection law permits, we may ask you to reconsider or charge a proportional fee. A request may be manifestly unfounded if the individual has no clear intention to access the information or is malicious in intent and is using the request to harass an organisation with no real purposes other than to cause disruption. Whether a request is excessive depends on its particular circumstances. A request may be excessive if it repeats the substance of previous requests and a reasonable interval has not elapsed; or overlaps with other requests.

If you would like to exercise any of these rights or you have some other objection to how your personal data is used, put your request in writing, to the Director of Finance and Operations by email at dataprotection@rgs.newcastle.sch.uk or by post at The Royal Grammar School, Eskdale Terrace,

Newcastle upon Tyne, NE2 4DX, or 0191 281 5711.

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), 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), provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the school itself for the purposes of the education, training or employment of any individual.

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 (or your child's) 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.

PUPIL RIGHTS

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 section **Whose Rights?** 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.

Pupils in the Senior School 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. Older Junior School children may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

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.

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.

CONSENT

Where the school is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Examples where we do rely on consent are: uses of images and recordings (see the RGS TAKING, STORING AND USING IMAGES OF PUPILS POLICY), transfer of data to foreign universities as part of their application process, where visas are required for certain overseas trips and certain types of fundraising activity. Please be aware however that the school may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or

because a purchase of goods, services or membership of an organisation such as an alumni or parents' association has been requested).

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 STUDENT ACCEPTABLE USE POLICIES, STUDENT MOBILE DEVICE LOAN AGREEMENT, ESAFETY POLICY, JUNIOR SCHOOL COMPUTING POLICY, and the school rules. Staff are under professional duties to do the same covered under the relevant staff STAFF ACCEPTABLE USE POLICY, ESAFETY POLICY, REMOTE WORKING POLICY and STAFF MOBILE DEVICE LOAN AGREEMENT.

DATA ACCURACY AND SECURITY

The school 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 school via the online Parent Portal or the School Office of any significant changes to important information, such as contact details, 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 school may need to process your data, of who you may contact if you disagree.

The school will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

THIS POLICY

The school 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 the Director of Finance and Operations using the following contact details The Royal Grammar School, Eskdale Terrace, Newcastle upon Tyne, NE2 4DX, dataprotection@rgs.newcastle.sch.uk or 0191 281 5711.

If an individual believes that the school has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the school complaints/grievance procedures as appropriate and should also notify the Director of Finance and Operations. Without prejudice to any administrative or judicial remedy, you have the right to lodge a complaint with the supervisory authority, the Information Commissioner's Office (ICO), if you consider that the processing of your personal data infringes the principles of the Regulations, although the ICO recommends that steps are taken to resolve the matter with the school before involving the regulator. Their address is as follows:

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire
SK9 5AF

or via their website at https://ico.org.uk/make-a-complaint/

CONTACT DETAILS

Royal Grammar School, Eskdale Terrace, Newcastle upon Tyne NE2 4DX

Tel: 0191 281 5711

General enquiries: communications@rgs.newcastle.sch.uk

This policy applies to the whole school and is published to parents, students and staff
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www.rgs.newcastle.sch.uk