



# Privacy Notice for Parents of Younger Pupils

## How We Use Your Information

### KEY INFORMATION

This notice contains the key information about **how** and **why** we collect your personal information and **what** we do with that information.

In this context 'we', 'Clifton College' or the 'College' shall mean Clifton College and its subsidiary undertakings. Where applicable, it may also include Clifton College Development Trust and/or the College's alumni association (the Old Cliftonian Society).

Our primary reason for using your Child's personal information is to provide them with an education.

We set out below examples of the different ways in which we use your personal information and where that personal information comes from.

- Admissions forms give us lots of personal information about your child. We get information from you, your teachers and other pupils. Your child's old school also gives us information about you so that we can teach and care for your child.
- Sometimes we get information from your child's doctors and other professionals where we need this to look after your child.
- We may need to report some of your child's information to the government (e.g. the Department for Education). We will need to tell the local authority that your child attends the College, if your child leaves the College or let them know if we have any concerns about your child's welfare.
- We may use photographs or videos of your child for the College's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the College. We may continue to use these photographs and videos after your child has left the College.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing.
- We use CCTV to make sure the College site is safe. CCTV is not used in private areas such as changing rooms.
- We will keep details of your child's address when they leave so we can send them the Cliftonian Magazine and to find out how they are getting on. We may also pass their details onto the alumni organisation which is called the Old Cliftonian Society. Further information on the alumni association can be found here <http://oc-online.co.uk/>.



You have the following rights regarding your child's information:

- Rectification of information held;
- Access to information held;
- Deletion of information in certain circumstances;
- Portability - the transfer of information to you or a third party;
- Restriction of use of information; and
- The right to object to the use of information in certain circumstances.

The Director of Corporate Services is the person responsible at our College for managing how we look after personal information. The Director of Corporate Services is supported by the Data Protection Adviser ('DPA'). The Director of Corporate Services or the DPA can answer any questions which you may have about how we use your child's personal information.



## INTRODUCTION

This notice is to help you understand **how** and **why** we collect your child's personal information and **what** we do with that information. It also explains the decisions that you can make about your child's information.

For the purposes of this Privacy Notice references to the 'College' or 'We' should be understood to mean Clifton College and its subsidiaries. Where applicable, it may also include Clifton College Development Trust and/or the College's alumni association (the Old Cliftonian Society).

We are giving you this notice because you are able to exercise your child's data protection rights on their behalf. When your child is older (usually when they reach the age of 12) they will be considered mature enough to exercise their own data protection rights.

If you have any questions about this notice please talk to the Director of Corporate Services or DPA.

## WHAT IS "PERSONAL INFORMATION"?

Personal information is information that the College holds about your child and which identifies your child.

This includes information such as their date of birth and address as well as things like exam results, medical details, unique pupil number and behaviour records. We will also hold information such as your child's religion or ethnic group for the purposes of providing effective pastoral care. CCTV, photos and video recordings of your child are also personal information.

## OUR LEGAL BASES FOR USING YOUR CHILD'S INFORMATION

This section contains information about the legal basis that we are relying on when handling your child's information.

The two tables below contain a general description of the different legal bases but we have also used a colour code system so that you can see which bases we are relying on for each of the purposes described at paragraphs 1 to 37 below.

### Legitimate interests ("L")

This means that the College is using your child's information when this is necessary for the College's legitimate interests or someone else's legitimate interests. We won't rely on this basis when your child's interests and fundamental rights override our legitimate interests. Specifically, the College has a legitimate interest in:

- Providing your child (and other children) with an education and making sure that your child is behaving properly.
- Complying with our agreement with you for your child to be at the College.
- Keeping the College buildings safe.



- Making sure that the College is well managed and that we protect the College's reputation.
- Safeguarding and promoting your child's welfare and the welfare of other children.
- Promoting the objects and interests of the College. This includes fundraising e.g. if we want to raise money to build new buildings and using photographs of your child in promotional material such as on our website and in the prospectus.
- Ensuring that all relevant legal obligations of the College are complied with (for example in relation to inspections).
- Using your child's information in connection with legal disputes.
- Facilitating the efficient operation of the College.

In addition your child's personal information may be processed for the legitimate interests of others. For example, we may use information about your child when investigating a complaint made by another pupil.

#### Legal obligation ("LO")

- Where the College needs to use your child's information in order to comply with a legal obligation, for example to report a concern about your wellbeing to Children's Services. We will also have to disclose your child's information to third parties such as the courts, the local authority or the police where legally obliged to do so.

#### Performance of a task carried out in the public interest (or carrying out public tasks) ("PI")

This applies where what we are doing is for the benefit of people generally. The following are examples of where this applies:

- providing your child and others with an education;
- safeguarding and promoting your child's welfare and the welfare of other children;
- facilitating the efficient operation of the College; and
- ensuring that we comply with all of our legal obligations.

The College must also comply with an additional condition where it processes special categories of personal information. These special categories include: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about sex life or orientation.

#### Substantial public interest ("SP")

- The College is allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is similar to "public interest" in the table above. For example the College will use information about your child's health to look after him / her. We may also use other types of special category personal data about your child to provide them with an



education, to look after your child and their classmates or when the College is inspected.

#### Employment and social protection and social security law ("ESP")

There will be times when the College needs to use your child's information because we are an employer. Also the College will use your child's information to comply with social protection law (e.g. to look after your child) and social security laws. Social protection law is concerned with preventing, managing, and overcoming situations that adversely affect people's wellbeing.

#### Vital interests ("VI")

- In limited circumstances we may use your child's information to protect your child's vital interests or the vital interests of someone else (e.g. if your child or they are seriously hurt).

#### Legal claims ("LC")

- The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers. This applies whenever sharing special category data is necessary in relation to legal claims.

#### Medical purposes ("MP")

- This includes medical treatment and the management of healthcare services.

## HOW AND WHY DOES THE COLLEGE COLLECT AND USE YOUR CHILD'S PERSONAL INFORMATION?

We set out below different ways in which we use personal information and where this personal information comes from. The letters highlighted in different colours refer to the legal bases we are relying on. Please see the section above for an explanation.

1. Our primary reason for using your child's information is to provide your child with an education - LI, PI, SPI.
2. The College will also use your child's personal information to safeguard and promote your child's welfare and the welfare of others (for example, so that we can look after your child if they are hurt) - LI, PI, SPI, ESP, MP.

The admissions forms which you complete give us personal information about your child. We get information from your child, their teachers and other pupils. Your child's previous school also gives us information about how well your child did and any difficulties they had if we need this information to teach and care for them.

Sometimes we get information from your child's doctor and other professionals where we need this to look after your child.

3. We will use information about your child during the admissions process e.g. when marking entrance exams and considering any information provided on the



- registration form. We may let your child's previous school know if they have been offered a place at the College - LI, PI, SPI.
4. We need to tell all appropriate members of staff if your child is allergic to something or has a health issue - LI, PI, SPI.
  5. We will tell your child's teachers if he or she has special educational needs or requires extra help with some tasks - LI, PI, SPI.
  6. We will need to share information about your child (e.g. about their health and wellbeing) with those responsible for your child's pastoral care, including College Health Centre staff, school counsellors and, unless you have asked us not to, the Doctors' Surgery that supports the College - LI, PI, SPI, ESP, MP.
  7. If we have information that your child suffers from an allergy we will use this information so that we can look after your child - LI, PI, SPI, VI, MP.
  8. If we have information that your child suffers from a disability we will use information about that disability to provide support - LI, PI, SPI, ESP and in certain circumstances, MP.
  9. Where appropriate, the College will have information about your religious beliefs and practices. For example, if your child does not eat certain foods - LI, PI, SPI.
  10. We use CCTV to make sure the College site is safe. CCTV is not used in private areas such as changing rooms - LI, PI, SPI.
  11. We record your child's attendance and if he or she has time away from the College we record the reason(s) why - LI, PI, SPI.
  12. We will need to report some of your child's information to the government (e.g. the Department for Education). We will need to tell the local authority that your child attends the College, if your child leaves the College or let them know if we have any concerns about your child's welfare - LI, LO, PI, SPI, ESP.
  13. We may need to share information about your child with the Health and Safety Executive (a government organisation) if there is a health and safety issue at the College - LI, LO, SPI.
  14. The College is a charity which means that in exceptional circumstances we may need to share your child's information with the Charity Commission e.g. in the event of a serious incident - LI, LO, PI, SPI.
  15. When we are inspected by the Independent Schools Inspectorate we will have to make your child's information available to the inspectors to assist them with their inspection - LI, LO, PI, SPI.
  16. If the College receives a complaint or grievance which involves your child we will need to use their information to deal with this appropriately. For example, if you make a complaint or if another parent complains about an issue which involves your child - LI, PI, SPI.
  17. The College may share information about your child with the local authority for the purpose of the preparation, implementation and/or review of your child's Statement of Special Educational Needs or Education Health and Care Plan - LI, PI, LO.
  18. We are legally required to provide the Department for Education with certain information about your child. Some of this information will be stored on the National Pupil Database. Organisations can request information from the National Pupil Database which includes information about your child. But they are only allowed to do this for limited purposes and they must be very careful about how



- they use your child's information. More information can be found here - [How to access Department for Education \(DfE\) data extracts](#) - **LO, SPI**.
19. We will need information about any court orders or criminal petitions which relate to your child. This is so that we can safeguard your child's welfare and wellbeing and the other pupils at the College - **LI, PI, SPI**.
  20. If your child is from another country we have to make sure that they have the right to study in the UK. Sometimes the government will ask us to provide information as part of our reporting requirements. In addition to this we have a duty to provide information about your child to UK Visas and Immigration - **LI, LO, PI, SPI**.
  21. Depending on where your child will go when they leave us we will provide their information to other schools and colleges. For example, we will share information about your child's exam results and provide references - **LI, PI, SPI**.
  22. If your child has a safeguarding file, we are legally required to pass this file to their next school - **LI, LO, PI, SPI, ESP**.
  23. If your child takes public examinations we will need to share information about them with examination boards. For example, if your child requires extra time in exams - **LI, PI, SPI**.
  24. We may need to share information with the police or our legal advisers if something goes wrong or to help with an enquiry. For example, if one of your child's classmates is injured at College or if there is a burglary - **LI, LO, PI, SPI, LC**.
  25. We use consultants, experts and other advisors to assist the College in fulfilling its obligations and to help run the College properly. We will share your child's information with them if this is relevant to their work - **LI, PI, SPI**.
  26. If your child has misbehaved in a serious way, we may need to share information with the police and we may need to use information about the action taken by the police - **LI, LO, PI, SPI, ESP**.
  27. We may share some information with our insurance company to make sure that we have the insurance cover that we need - **LI, PI, SPI, LC**.
  28. We will share your child's academic and (where fair) their behaviour records with you and, where you have authorised this, their education guardian, so you can support their schooling - **LI, PI, SPI**.
  29. We will monitor your child's use of the College computer system, in general, including email, the internet and mobile electronic devices, e.g. iPads (whether College owned or personally owned), while connected to the College network. This is to check that your child is not misbehaving when using this technology or putting themselves at risk of harm. If you would like more information about this you can read the Electronic Device Acceptable Use Agreement or speak to your child's form teacher or Housemaster/mistress - **LI, SPI**.
  30. We may use photographs or videos of your child for the College's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the College. We will continue to use these photographs and videos after your child has left the College - **LI, PI**.
  31. Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson - **LI**.

If you have any concerns about us using photographs or videos of your child please speak to the Headmaster.



32. We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing - **LI**.
33. We will keep details of your child's address when they leave so we can send them the Cliftonian Magazine and to find out how they are getting on. We may also pass their details onto the alumni organisation which is called the Old Cliftonian Society. Further information on the alumni association can be found here <http://oc-online.co.uk/> - **LI**.
34. The College must make sure that our computer network is working well and is secure. This may involve information about your child, for example, our anti-virus software might scan files containing information about your child - **LI**.
35. From time to time, we may use a third party to provide activities such as an external sports coach. We may share your child's information with them, for example, to tell them what sports they are good at- **LI, PI**
36. We may keep some information about your child for a very long time or even indefinitely if we feel it is important for historical, research or statistical purposes. These records are things that need to be permanently preserved at an archive, e.g. where there is community interest such as whole school photos, sporting teams lists, award winners names - **LI**.

We will only share your child's information with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would normally.

We sometimes use contractors to handle personal information on our behalf. The following are examples:

- a. IT consultants who might access information about your child when checking the security of our IT network; and
- b. third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the College site; and
- c. third party managed services for IT network facilities and analysis of pupils' computer activity for the purposes of safeguarding.

## CRIMINAL OFFENCE INFORMATION

In exceptional circumstances, we may use information about criminal convictions or offences. We will only do this where the law allows us to. This will usually be where such processing is necessary to carry out our obligations, to exercise our rights or to look after our pupils.

## MORE THAN ONE BASIS

As you will see from the information above, in some cases we will rely on more than one basis for a particular use of your child's information. In addition, we may move from one of the legal bases listed above to another as circumstances change. For example, as a safeguarding matter becomes more serious, we may start to rely on legal obligation to





share personal information with the local authority in addition to the other legal bases which are noted for safeguarding purposes.

## **CONSENT**

We may ask for your consent to use your child's information in certain ways as an alternative to relying on any of the bases in the table above. For example, we may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on legitimate interests. If we ask for your consent to use your child's personal information you can take back this consent at any time.

Any use of your child's information before you withdraw your consent remains valid. Please contact the Headmaster in writing if you would like to withdraw any consent given.

## **SENDING INFORMATION TO OTHER COUNTRIES**

In certain circumstances, we will send your information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may store your information on cloud computer storage based overseas.

We will conduct a risk assessment to determine whether there will be an adequate level of protection in place before we transfer the information. We follow the guidance from the ICO.

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/international-transfers-a-guide/>

If you have any questions about the safeguards that are in place please contact the Data Protection Adviser.

## **FOR HOW LONG DO WE KEEP YOUR CHILD'S INFORMATION?**

The School will retain personal data securely and only in line with how long it is necessary to keep it for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary student personnel files is until the student reaches 25 years of age. However, incident reports and safeguarding files will need to be kept much longer in accordance with specific legal requirements.

In exceptional circumstances we may keep your child's information for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

Please see our Information and Records Retention Policy for more detailed information. This can be requested by contacting the College's Data Protection Adviser ([dpa@cliftoncollege.com](mailto:dpa@cliftoncollege.com)).



## WHAT DECISIONS CAN YOU MAKE ABOUT YOUR CHILD'S INFORMATION?

From May 2018 you will be able to make various decisions about your child's information. Some of these are new rights whilst others build on your child's existing rights. Your child's rights are as follows:

- **Rectification:** if information held by the College about your child is incorrect you can ask us to correct it.
- **Access:** you can also ask what information we hold about your child and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about your child, where it came from and what types of people we have sent it to.
- **Deletion:** you can ask us to delete the information that we hold about your child in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your child's information to you or to a third party in a format that can be read by computer in certain circumstances.
- **Restriction:** our use of information about your child may be restricted to simply storing it in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.
- **Object:** you may object to us using your child's information where:
  - we are using it for direct marketing purposes;
  - the legal basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest. Please see the section "Our legal bases for using your child's information" above;
  - we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of your class for historical reasons.

The Director of Corporate Services or DPA can give you more information about your child's data protection rights.

## FURTHER INFORMATION AND GUIDANCE

This notice is to explain how we look after your child's personal information. The Director of Corporate Services or DPA can answer any questions which you might have.

Please speak to the Director of Corporate Services or DPA if:

- you would like to exercise any of your child's rights listed above; or
- you would like us to update the information we hold about your child; or
- you would prefer that certain information is kept confidential.

If you consider that we have not acted properly when using your child's personal information you can contact the Information Commissioner's Office: [ico.org.uk](http://ico.org.uk).