



# Privacy Notice for Parents

## 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).

Personal information is information that identifies you and relates to you. For example, information about your family circumstances, your financial information and photographs of you.

The College's primary reason for using your personal information is to provide educational services to your child.

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

- We obtain information about you from admissions forms and from your child's previous school. We may also get information from professionals such as doctors and from local authorities.
- We will have information about any family circumstances which might affect your child's welfare or happiness.
- We will process financial information about you in relation to the payment of fees. In some cases we get information about you from third parties such as credit reference agencies or from your child's previous school(s).
- We may take photographs or videos of you at College events to use on social media and on the College website. This is to show prospective parents and 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.
- We will send you information to keep you up to date with what is happening at the College. For example, by sending you information about events and activities taking place (including fundraising events) and the College newsletter.
- We will keep details of your address when your child leaves the College so we can send you the Cliftonian magazine and to find out how your child is progressing.

In some situations we may need to share your information with third parties. For example:

- In accordance with our legal obligations, we will share information with local authorities, the Independent Schools Inspectorate and the Department for Education, for example, where we have any safeguarding concerns.
- If you have unpaid fees we may share information about this with other schools or educational establishments to which you intend to send your child.
- On occasion, we may need to share information with the police, our legal advisors and our insurers.



You have the following rights regarding your 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 Bursar is the person responsible at our College for managing how we look after personal information. The Bursar is supported by the Data Protection Adviser ('DPA'). The Bursar or the DPA can answer any questions which you may have about how we use your personal information.



## INTRODUCTION

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

If you have any questions about this notice please contact the Bursar or DPA.

## WHAT IS "PERSONAL INFORMATION"?

Personal information is information that identifies you as an individual and relates to you. This includes your contact details, next of kin and financial information.

## OUR LEGAL BASES FOR USING YOUR INFORMATION

This section contains information about the legal bases that we are relying on when handling your 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 32 below.

### Legitimate interests ("LI")

This means that the College is using your information when this is necessary for the College's legitimate interests except when your interests and fundamental rights override our legitimate interests. Specifically, the College has a legitimate interest in:

- providing educational services to your child and to other children;
- safeguarding and promoting the welfare of your child, other children and our employees;
- promoting the objects and interests of the College. This includes fundraising and using photographs of you at our College events in promotional material. It also includes making sure that we are able to enforce our rights against you, for example, so that we can contact you if unpaid College fees are due;
- keeping the College buildings safe;
- using your information in connection with legal disputes. For example, if you or your child bring a claim against the College;
- protecting the College's reputation;
- facilitating the efficient operation of the College; and
- ensuring that all relevant legal obligations of the College are complied with (for example in relation to inspections).



In addition your personal information may be processed for the legitimate interests of others. For example another school will have a legitimate interest in knowing if you have not paid College fees that are due to us.

#### Necessary for contract ("CT")

We will need to use your information in order to perform our obligations under our contract with you and for you to perform your obligations as well. For example, we need your name and contact details so that we can update you on your child's progress and so that we can contact you if there is a concern.

#### Legal obligation ("LO")

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

#### Vital interests ("VI")

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

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

The following are examples of when we use your information to perform tasks in the public interest:

- providing your child with an education;
- safeguarding and promoting your welfare, 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 are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation.

#### Substantial public interest ("SPI")

The College is also 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.

#### Social protection and social security laws

Also the College may use your 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.



### Legal claims ("LC")

We are allowed to use your information if this is necessary in relation to legal claims. For example, this allows us to share information with our legal advisors and insurers.

## HOW AND WHY DOES THE COLLEGE COLLECT AND USE PERSONAL INFORMATION?

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

1. The College's primary reason for using your personal information is to provide educational services to your child - **LI**, **CT**, **PI**, **SPI**.
2. We will have information about any family circumstances which might affect your child's welfare or happiness. This is to help us provide appropriate care and support to your child - **LI**, **CT**, **PI**, **SPI**.
3. We will need information about any court orders or criminal petitions which relate to you. This is so that we can safeguard the welfare and wellbeing of your child and the other pupils at the College - **LI**, **CT**, **PI**, **SPI**.
4. We use CCTV to make sure the College site is safe. Images captured of you via CCTV will be your personal information. CCTV is not used in private areas such as toilets - **LI**, **CT**, **PI**, **SPI**.
5. If there is a complaint or grievance made to the College which involves you then we will use your information in connection with that complaint or grievance - **LI**, **PI**, **SPI**.
6. The College may share information about you 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**, **LC**.
7. Where appropriate, the College will have information about your religious beliefs and practices. For example, if you do not eat certain foods - **LI**, **SPI**.
8. We may take photographs or videos of you at College events to use on social media and on the College website. This is to show prospective parents and 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 - **LI**.
9. We will send you information to keep you up to date with what is happening at the College. For example, by sending you information about events and activities taking place (including fundraising events) and the College newsletter - **LI**.
10. We will keep details of your address when your child leaves the College so we can send you The Cliftonian magazine, other information about the College that may be of interest and to find out how your child is progressing. - **LI**.
11. We may use information about you if we need this for historical research purposes or for statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the College - **LI**.



12. We may use your information when ensuring network and information security, for example, our anti-virus software might scan files containing information about you - **LI**.
13. We can keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the College - **LI**

#### Financial information

14. We will process financial information about you in relation to the payment of fees. In some cases we get information about you from third parties such as credit reference agencies or from your child's previous school(s) - **LI, CT**.
15. We will hold information about bankruptcy petitions and statutory demands, where relevant - **LI, CT**.
16. We may search the files of any licensed credit reference agency in order to verify your identity. This also allows us to assess your application for the award of a bursary or for credit in contemplation of an agreement for the deferment of fees. The credit reference agency will keep a record of that search and details about your application. This record will be seen by other organisations which make searches about you - **LI, CT**.
17. We may share your information with debt recovery suppliers if you do not pay any College fees owed to the College - **LI, CT**.
18. We may obtain information about you from publicly available sources, such as Companies House and Zoopla, to assess your ability to pay College fees and to assist us with our bursary application process - **LI, CT**.

Failure to supply information may result in a refusal of an award or credit.

#### Sharing personal information with third parties

19. In accordance with our legal obligations, we will share information with local authorities, the Independent Schools Inspectorate and the Department for Education, for example, where we have any safeguarding concerns or to comply with our legal obligations - **LI, LO, PI, SPI**.
20. On occasion, we may need to share your information with the police for the prevention and investigation of crime and the prosecution of offenders. We will only do this in specific circumstances to assist the police with their investigations - **LI, CT, LO, PI, SPI**.
21. We may need to share information about you with the Health and Safety Executive (a government organisation) if there is a health and safety issue at the College - **LI, LO, PI, SPI**.
22. In certain circumstances, we may also need to share information with our legal advisers for the purpose of obtaining legal advice - **LI, LO, PI, SPI, LG**.
23. Occasionally we may use consultants, experts and other advisors to assist the College in fulfilling its obligations and to help run the College properly (e.g. our accountants). We will share your information with them if this is relevant to their work - **LI, CT, PI, SPI**.
24. If your child is not of British nationality we have to make sure that your child has 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 you to UK Visas and Immigration to comply with our duties as a licensed sponsor of students - LI, CT, LO, PI, SPI.
25. The College is a charity which means that in exceptional circumstances we may need to share your information with the Charity Commission e.g. in the event of a serious incident - LI, LO, PI, SPI.
  26. We may share information about you with our insurance company, for example, where there is a serious incident at the College - LI, SPI, LC.
  27. If you have unpaid fees we may share information about this with other schools or educational establishments to which you intend to send your child - LI.
  28. If your child leaves us to attend another school we may provide that school with information about you. For example, details of family circumstances if there have been any safeguarding incidents - LI, LO.
  29. We may share information about you with others in your family, such as another parent or step-parent. For example, where this is part of our obligation to take care of your child, as part of our wider legal and regulatory obligations, or in connection with College fees - LI, PI, SPI.
  30. We may need to share information if there is an emergency, for example, if you are hurt whilst on College premises - LI, VI.
  31. We may send you information about the School before you accept a place for your child. For example, we may send you a copy of the school prospectus - LI.
  32. If your child has an Education and Health Care Plan (EHCP), we will share information with and obtain information from the local authority about you - LO, PI, SPI.

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

- a. IT consultants who might access information about you 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.

We obtain information about you from admissions forms and from your child's previous school. We may also get information from professionals such as doctors and from local authorities.

## CRIMINAL OFFENCE INFORMATION

We may only use information relating to criminal convictions and offences where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations or to exercise our rights.

Less commonly, we may use information relating to criminal convictions and offences where it is necessary in relation to legal claims, where it is necessary to protect our pupils and you are not capable of giving your consent, or where you have already made the information public.



## **MORE THAN ONE BASIS**

As you will see from this notice, in some cases we will rely on more than one basis above for a particular use of your 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 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 personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please contact the Head Master in writing if you would like to withdraw any consent given.

## **SENDING INFORMATION TO OTHER COUNTRIES**

We comply with the UK GDPR. 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:

1. store your information on cloud computer storage based overseas; or
2. we may carry your contact details when undertaking an overseas school trip on which your child is participating.

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)

If the country that we wish to send your information to is not on the list, or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland), it might not have the same level of protection as in the UK. We will conduct a risk assessment to determine whether there will be an adequate level of protection in place before we transfer the information. 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 INFORMATION?**

We keep your information for as long as we need to in order to educate and look after your child. We will keep some information after your child has left the College, for example, so that we can find out what happened if you make a complaint.





In exceptional circumstances we may keep your 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 INFORMATION?

From 25 May 2018 data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

- **Rectification:** if information the College holds about you is incorrect you can ask us to correct it.
- **Access:** you can also ask what information we hold about you 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 you, 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 you in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your information to you or to a third party in a format that can be read by computer. This applies where (a) the information has been provided by you; (b) the basis that we are relying on to process your information is consent or contract (please see "Our legal bases for using your information" above); and (c) the information is being processed by us on computer.
- **Restriction:** our use of information about you may be restricted 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 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 information" above; and
  - we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of you at a College event for historical reasons.

The Bursar or DPA can give you more information about your data protection rights.

## FURTHER INFORMATION AND GUIDANCE

The Bursar is the person responsible at our College for managing how we look after personal information and deciding how it is shared.



Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

This notice is to explain how we use your personal information. The Bursar or DPA can answer any questions which you may have.

This privacy notice does not, and is not intended to, give you any rights which you did not already have. For example, it does not give you any additional contractual rights.

Please speak to the Bursar or DPA if:

- you object to us using your information for marketing purposes e.g. to send you information about College events. We will stop using your information for marketing purposes if you tell us not to; or
- you would like us to update the information we hold about you; or
- you would prefer that certain information is kept confidential.

If you fail to provide certain information when requested, we may not be able to perform our obligations under the contract we have entered into with you. We may also be prevented from complying with our legal obligations (such as to ensure the welfare of your child and their classmates).

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