



Privacy Notice for Older 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).

Personal information is information that identifies you and relates to you. For example, information about how well you are doing at College and any information that we need to take care of you. Photographs and videos of you also count as your personal information.

Our primary reason for using your personal information is to provide you 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. We get information from you, your parents, your teachers and other pupils. Your old school also gives us information about you so that we can teach and care for you.
- Sometimes we get information from your doctors and other professionals where we need this to look after you.
- We may need to report some of your information to the government (e.g. the Department for Education). We will need to tell the local authority that you attend the College, if you leave the College or let them know if we have any concerns about your welfare.
- We will share your academic and (where fair) your behaviour records with your parents, and where your parents have authorised this, your education guardian so they can support your schooling.
- We may use photographs or videos of you 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 you have 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 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 you leave so we can send you the Cliftonian Magazine, and to find out how you are getting on. We may also pass your



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/>.

If you have any questions about how we use your personal information, please speak to your Housemaster/mistress. Alternatively, you can speak to your parents who will talk to us on your behalf.

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 your personal information 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 talk to your Housemaster/mistress.

WHAT IS "PERSONAL INFORMATION"?

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

This includes information such as your name, 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 religion or ethnic group for the purposes of providing effective pastoral care. CCTV, photos and video recordings of you are also personal 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 39 below.

Legitimate interests ("L")

This means that the College is using your 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 interests and fundamental rights override our legitimate interests. Specifically, the College has a legitimate interest in:

- Providing you with an education and making sure that you are behaving properly.
- Complying with our agreement with your parents for you to be at the College.
- Looking after you, your classmates and our staff (e.g. your teachers).
- Keeping the College buildings safe.
- Making sure that the College is well managed and that we protect the College's reputation.
- Telling people about the College and what we do here e.g. we may use photographs of you in our prospectus, on our website or in our social media.



- Ensuring that all relevant legal obligations of the College are complied with (for example in relation to inspections).
- Using your information in connection with legal disputes.
- Improving the College e.g. if we want to raise money to build new buildings or to make sure that we are providing you and your classmates with a good schooling experience.

In addition your personal information may be processed for the legitimate interests of others. For example, we may use information about you when investigating a complaint made by one of your fellow pupils.

Legal obligation ("LO")

The College might need to use your 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 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")

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

- providing you and others with an education;
- safeguarding and promoting your welfare and the welfare of your classmates;
- 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 ("SPI")

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 health to look after you. We may also use other types of special category personal data about you to provide you with an education, to look after you and your 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 information because we are an employer (e.g. we employ your teachers). Also the College will use your information to comply with social protection law (e.g. to look after you) and social security laws. Social protection law is concerned with preventing, managing, and overcoming situations that adversely affect people's wellbeing.

Vital interests ("I")

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).

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. 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 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 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 you with an education - LI, PI, SPI.
2. The College will also use your personal information to safeguard and promote your welfare and the welfare of others (for example, so that we can look after you if you are hurt) - LI, PI, SPI, ESP, MP.

Admissions forms give us lots of personal information about you such as your name, contact details, disabilities, any particular difficulties you have with work, hobbies and interests, medical information (such as information about an allergy) and family circumstances. We get information from you, your parents, your teachers and other pupils. Your old school also gives us information about how well you did and any difficulties you had so that we can teach and care for you.

Sometimes we get information from your doctors and other professionals where we need this to look after you.

3. We will use information about you during the admissions process e.g. when marking your entrance exams and learning more about you from your parents before you join the College. We may let your old school know if you have been offered a place at the College - LI, PI, SPI.
4. We need to tell the appropriate teachers if you are allergic to something or have a health issue - LI, PI, SPI.



5. We will need to tell your teachers if you have special educational needs or need extra help with some tasks - LI, PI, SPI.
6. We will need to share information about you (e.g. about your health and wellbeing) with the those responsible for your pastoral care, including College Health Centre staff, Counsellor and, unless your parents have asked us not to, the Doctors' Surgery that supports the College - LI, PI, SPI, ESP, MP.
7. If we have information that you suffer from an allergy we will use this information so that we can look after you - LI, PI, SPI, MP.
8. If we have information that you suffer 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 you do 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 attendance and if you have time away from the College we record the reason(s) why - LI, PI, SPI.
12. We will need to report some of your information to the government (e.g. the Department for Education). We will need to tell the local authority that you attend the College, if you leave the College or let them know if we have any concerns about your welfare - LI, LO, PI, SPI, ESP.
13. We are legally required to provide the Department for Education with certain information about you and your classmates. 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 you. But they are only allowed to do this for limited purposes and they must be very careful about how they use your information. More information can be found here - [How to access Department for Education \(DfE\) data extracts](#) - LO, SPI.
14. 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.
15. The College is a charity which means that we may need to share your information with the Charity Commission which checks how we are behaving as a charity - LI, LO, PI, SPI.
16. We will need information about any court orders or criminal matters which relate to you. This is so that we can safeguard your welfare and wellbeing and the other pupils at the College - LI, PI, SPI.
17. If you are from another country we have to make sure that you 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 you to UK Visas and Immigration who are part of the government - LI, LO, PI, SPI.
18. Depending on where you will go when you leave us we will provide your information to other schools, colleges and universities, UCAS or potential employers. For example, we will share information about your exam results and provide references - LI, PI, SPI.



19. We may pass on information to your next school which they need to look after you, for example, information about any concerns we have had about your welfare - **LI**, **LO**, **PI**, **SP**, **ESP**.
20. When you take public examinations (e.g. GCSEs) we will need to share information about you with examination boards. For example, if you require extra time in your exams - **LI**, **PI**, **SP**.
21. The Learning Records Service (which is part of the government) will give us your unique learning number. We may receive details about you (e.g. your qualifications) from the Learning Records Service - **LI**, **PI**, **SP**.
22. We may provide your information to third party work experience providers so that they can assess your suitability for a placement - **LI**, **PI**, **SP**.
23. The College is sometimes inspected to make sure that we are continuing to be a good school. We will have to make your information available to the inspectors to help them to carry out their job - **LI**, **LO**, **PI**, **SP**.
24. If someone makes a complaint about how the College has behaved we may need to use your information to deal with this appropriately. For example, if your parents complain that we have not looked after you properly - **LI**, **PI**, **SP**.
25. The College may share information about you with the local authority for the purpose of the preparation, implementation and / or review of your Statement of Special Educational Needs or Education Health and Care Plan - **LI**, **PI**, **LO**.
26. We may need to share information about you with the police or our legal advisers if something goes wrong or to help with an enquiry. For example, if one of your classmates is injured at College or if there is a burglary - **LI**, **LO**, **PI**, **SP**, **LC**.
27. 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 information with them if this is relevant to their work - **LI**, **PI**, **SP**.
28. If you have 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**, **SP**, **ESP**.
29. We may share some information with our insurance company to make sure that we have the insurance cover that we need - **LI**, **PI**, **SP**, **LC**.
30. We will share your academic and (where fair) your behaviour records with your parents and, where your parents have authorised this, your education guardian, so they can support your schooling - **LI**, **PI**, **SP**.
31. If you receive financial assistance towards school fees from a third party organisation, we may pass on information about your academic progress, including exam results, to the organisation - **LI**, **PI**, **SP**.
32. We will monitor your 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. In certain circumstances we will look at the content of your communications (e.g. emails). We monitor and look at your use of College owned devices to check that you and your classmates are not misbehaving, at risk of harm or for other good reasons. If you would like more information about this you can read the Electronic Device Acceptable Use Agreement or speak to your Housemaster/mistress - **LI**, **PI**, **SP**.
33. We may use photographs or videos of you 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 you have left the College - **LI**.

34. Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson - **LI**.

If you have concerns about us using photographs or videos of you please speak to the Head Master.

35. 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**.
36. We will keep details of your address when you leave so we can send you the Cliftonian Magazine and find out how you are getting on. If you do not do so directly, we may also pass your details onto the alumni organisation, the Old Cliftonian Society. Further information on the alumni association can be found here <http://oc-online.co.uk/> - **LI**.
37. The College must make sure that our computer network is working well and is secure. This may involve information about you, for example, our anti-virus software might scan files containing information about you - **LI**.
38. From time to time, we may use a third party to provide activities such as an external sports coach. We may share your information with them, for example, to tell them what sports you are good at - **LI, PI**.
39. 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**.

We will only share your 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 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.

If you have any questions about any of the above, please speak to your Housemaster/mistress.

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 information. In addition, we may move from one of the legal bases listed above to another as circumstances change. For example, if we become really worried about your wellbeing, 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 looking after you.

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 that you have given.

SENDING INFORMATION TO OTHER COUNTRIES

We comply with the UK GDPR. 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.

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

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 you. We will keep some information after you have 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).

WHAT DECISIONS CAN YOU MAKE ABOUT YOUR INFORMATION?

From 25 May 2018 you will be able to make various decisions about 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 in certain circumstances.
- **Restriction:** our use of information about you 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 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;
 - 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.

Your Housemaster/mistress can give you more information about your data protection rights.

FURTHER INFORMATION AND GUIDANCE

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

Please speak to the Head Master if:

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

The Bursar is in charge of the College's data protection compliance. You can ask your Housemaster/mistress to speak to the Bursar or speak to Bursar yourself. Alternatively, you can ask your parents to speak to us on your behalf if you prefer.

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.