



Clifton High School

co-educational nursery pre-school to sixth form

Privacy Notice	How We use Your Information Privacy Notice for Younger Pupils
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A shaded area denotes a regulation to which all schools must comply	

Clifton High School is committed to child protection and safeguarding children and young people and expects all staff, visitors and volunteers to share this commitment.

For the purposes of this Privacy Notice, younger pupils are classed as those current, past or prospective pupils who have not reached their 13th birthday before the beginning of an academic year i.e. 1st September. Older pupils are classed as those pupils who reach their 13th birthday in the current academic year. For example; a 12-year old child with a 13th birthday in May would be considered to be an 'older pupil' from the previous September when they are still 12 years of age. We are giving parents, carers and guardians (referred to in this policy as 'parents') this Notice because you are able to exercise your child's Data Protection rights on their behalf. During the academic year your child reaches their 13th birthday (including all holidays), they will be considered mature enough to exercise their own Data Protection rights.

References to the School are to Clifton High School, but include the activities of the Clifton High School Foundation, a separately registered charity.

Introduction

This Privacy Notice is intended to provide information about how the School will use (or 'process') the personal data of Younger Pupils (referred to in this policy as 'pupils').

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Parents are encouraged to read this Privacy Notice, to understand the School's obligations and to explain it to younger pupils in an age specific way. However, the School has a separate Data Protection Policy and Privacy Notices applicable to parents, its employees and other staff.

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 when former or prospective pupils visit the School, as part of its processes to safeguard the School community from Covid-19.

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 parents of pupils
- The Taking, Storing and Using Photographs or Video
- Any policies or notices applicable to staff concerning the handling of personal data
- CCTV policy
- Safeguarding, pastoral, or health and safety policies
- IT policies, including Use of ICT Agreements

Child Protection and Safeguarding

Child Protection and Safeguarding requirements always supersede Data Protection Laws. If information needs to be shared in the interests of child protection and safeguarding, this Notice can never be used as a reason not to do so.

Parents of younger pupils are reminded that the School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education (KCSIE) 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.

KCSIE also requires that, whenever a child leaves the School to join another school or college, their child protection file is promptly provided to the new organisation. The School will retain a copy in accordance with its retention policy for material related to safeguarding matters.

What is Personal Information?

Personal Information is information that the School holds about your child that identifies your child as an individual; this includes data such as their date of birth and address, as well as things like examination results, medical details and behaviour records. The School may also record your child's religion or ethnic group. CCTV, photos and video recordings of your child are also classed as Personal Information.

How and why does the School collect and use Personal Information

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.

Some uses of personal data will be made in accordance with the School's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

Set out below are examples of the different ways in which we use personal information and where this personal information comes from.

1. Our primary reason for using your child's personal information is to provide them with an education; for example, information about your child's progress and any information that we need to take care of your child.
2. The School will also use your child's personal information to safeguard and promote your child's welfare and the welfare of others; for example, to enable us to look after them if they are injured.
3. The Registration Form, completed by you at the start of the Admission process, gives the School lots of personal information about your child. We also get information from your child and your child's teachers. Your child's previous school also gives us information about your child to enable us to 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 will use this information during the Admissions process and will inform your child's previous school if they have been offered a place.
4. We need to tell all appropriate members of staff if your child has an allergy or any other health issue.
5. We will tell your child's teachers if he or she has special educational needs or requires extra help with some tasks.
6. We may need to share information about your child's health and wellbeing with the School Nurse or School Counsellor.

7. Where appropriate, the School will have information about your child's religious beliefs and practices.
8. We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms.
9. We record your child's attendance and if he or she has time away from the School we record the reasons why.
10. We need to report some of your child's information to the Government (e.g. the Department for Education). For example, we may need to tell the local authority that your child attends the School or let them know if we have any concerns about your child's welfare.
11. 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 School.
12. The School is a registered charity, which means that, in exceptional circumstances, we may need to share your child's information with the Charity Commission. For example, if you make a complaint or if another parent complains about an issue that involves your child.
13. When we are inspected by the Independent Schools Inspectorate, we may have to share your child's information with them to assist them with their Inspection.
14. If the School receives a complaint or grievance, which involves your child, we may 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 involving your child.
15. 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 and this might include information about your child. However, 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 - www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information
16. We will need information about any Court Orders or Criminal Petitions, which relate to your child. This is to enable the School to safeguard your child's welfare, wellbeing, and the other pupils at the School.
17. If your child is from another country, we need to make sure that they have the right to study in the UK. We might have to provide their information to UK Visas and Immigration.
18. Depending on where your child will go when they leave Clifton High School, we may need to provide their information to other schools and colleges. For example, we may share information about your child's examination results and also provide references. We may need to pass on other information that they need to look after your child.
19. If your child has a Safeguarding File, we are legally required to pass this file to their next school.
20. 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 examinations.
21. We may need to share information with the police or our legal advisers, if something goes wrong or to help with an inquiry; for example, if one of your child's classmates is injured at School or if there is a burglary.
22. Occasionally we may use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We might need to share your child's information

with them if this is relevant to their work. Where you ask us to do so, we will share your child's information with Visiting Music Teachers, for the purpose of facilitating music lessons.

23.If your child has misbehaved in a serious way and the police have become involved, we may need to use information about the action taken by the police.

24.We may share some information with our insurance company to make sure that we have the insurance cover that we need.

25.We may share your child's academic and, where reasonable, their behaviour records with you or their Education Guardian to enable continued support of their schooling.

26.We will monitor your child's use of email, the internet and mobile electronic devices e.g. iPads. This is to check that your child is not misbehaving when using this technology or putting themselves at risk of harm. Children in Nursery - Year 2 do not have an email address. All pupils from Nursery - Year 6 are always supervised when using a computer or tablet. For more information please see our E-Safety and Misconduct and Discipline Policy or speak to your child's Class Teacher or Form Tutor.

27. We may use photographs or videos of your child for the School's websites and social media sites or prospectus to show prospective pupils what we do here and to advertise the School. We may continue to use these photographs and videos after your child has left the School. If you have any concerns about the School using photographs or videos of your child, please speak to your child's Class Teacher or Form Tutor in the first instance.

28. We sometimes also use photographs and videos for teaching purpose; for example, to record a Drama lesson or to record a lesson delivered online. If you have any concerns about us using photographs or videos of your child, please speak to your child's Class Teacher or Form Tutor in the first instance.

29. We publish our Public Examination results, sports fixtures and other news on our websites and put articles and photographs in the local news, to tell people about what we have been doing.

30. We may keep details of your address when your child leaves the School to enable us to send you news from the School and to keep in touch with your child's progress, and to let you know about key events and fundraising activities. We may also pass your details on to the Development Office and Alumni; you have the option to opt out of this procedure. Further information on the Development Office and Alumni can be found at www.cliftonhigh.bristol.sch.uk/Welcome-OurCommunity

31.The School must make sure our computer network is working well and is secure and this might involve information about your child. For example, our anti-virus software may scan files containing information about your child.

32.The Learning Records Service, which is part of the Government, will give us your unique learning number. We may receive details about you from the Learning Records Service.

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

- IT consultants who might access information about your child when checking the security of our IT network
- We use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the School site

If you have any concerns about the above, please speak to your child's Class Teacher or Form Tutor in the first instance.

The following section contains information about the legal grounds we rely on when handling your child's information as described above.

Legitimate interests

This means that the School is using your child's information when this is necessary for the School's legitimate interests, except where the processing is unfair to your child. The School relies on legitimate interests for many of the ways in which it uses your child's information. Specifically, the School has a legitimate interest in

- For the purposes of pupil selection, confirming the identity of prospective pupils and their parents, and retaining a record if appropriate for the purposes of future applications or openings
- Providing your child, and other children, with an education, including musical education, physical training or spiritual development and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs
- Complying with our agreement with you for your child to be at the School
- Keeping the School buildings safe
- Ensuring the School is well managed and protecting its reputation
- Safeguarding and promoting your child's welfare and the welfare of other children
- Promoting the objects and interests of the School. This includes a) fundraising if we wish to raise money for a specific project b) using photographs or video/film of your child in 5 promotional materials such as our Websites, our Prospectus and School publications/newsletters such as, but not limited to, Event programmes
- Facilitating the efficient operation of the School
- Ensuring that all relevant legal obligations of the School are complied with; for example, in relation to Inspections
- Using your child's information in connection with legal disputes; for example, if you or your child brings a claim against the School, or in carrying out, or cooperating with any School or external complaints, disciplinary or investigation process
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School

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.

The School is relying on legitimate interests for all 32 purposes listed earlier.

The School 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.

Legal Obligation

Where the School needs to use your child's information in order to comply with a legal obligation; for example, to report a concern about wellbeing 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.

Legal obligation is relevant to the following purposes listed earlier: 10, 11, 12, 13, 14, 15, 17, 19, 21, 23, and 24

Vital Interests

In limited circumstances, we may use your child's information to protect his/her child's vital interests or the vital interests of others; for example, if your child is seriously hurt.

Performance of a task carried out in the Public Interest

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 child's welfare and the welfare of other children
- Facilitating the efficient operation of the School
- Ensuring that we comply with all of our legal obligations

The School is carrying out a public task in respect of all the 32 purposes listed earlier except numbers: 15, 28, 29, 30 and 31.

Substantial Public Interest

The School 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 above; for example, the School may use special categories of information about your child to provide them with an education, to look after your child and their classmates or when the School is inspected. The School is carrying out a public task in respect of all the 32 purposes listed earlier except numbers 28, 29, 30 and 31.

Employment, Social Protection Law and Social Security Law

There will be times, in our role as an employer, when the School needs to use your child's information. In addition, the School may use your child's information to comply with Social 6 Protection Law and Social Security Laws. The School is relying on the following grounds listed earlier for this purpose: 2, 6, 10, 19 and 23.

Legal Claims

We are allowed to use your information if this is necessary in relation to the establishment, exercise or defence of legal claims; this allows the School to share information with our legal advisors and insurers and is relevant to purposes listed earlier 21 and 24.

Medical Purposes

This includes medical treatment and the management of healthcare services. This applies to purposes listed earlier 2 and 6.

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.

Multiple Legal Grounds

In some cases, we will rely on more than one of the grounds above for a particular use of your child's information. For example, we may rely on legitimate interests and public interest grounds when using your child's information for safeguarding purposes of your child and of others. This may vary depending on circumstances. For example; if we have concerns about a pupil's welfare we may be legally obliged to inform the Local Authority or we may simply inform them, relying on legitimate or public interests.

Consent

We may ask for your consent to use your child's information in certain ways. 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 speak to your child's Class Teacher or Form Tutor, in the first instance, if you would like to withdraw any consent given.

Sending Information to other Countries

We may send your child's 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 child's information on cloud computer storage based overseas
- Communicate with you about your child by email when you are overseas; for example, when you are on holiday

We will provide you with details about the safeguards, which we have in place outside of this Privacy Notice. If you have any questions about the safeguards that are in place, please contact the Data Compliance Officer via the School Office.

For how long do we keep your child's information?

The School keeps your child's information for as long as we need to in order to educate and look after them. We will keep certain information after your child has left the School; for example, to enable us to investigate if you make a complaint.

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.

We can keep information about your child indefinitely if we need this for historical, research or statistical purposes; for example, if we consider the information might be useful to someone wishing to write a book about the School.

For more information, please see the Data Retention and Management Policy, which can be found on the School website.

What decisions can you make about your child's information?

Data Protection Laws gives your child a number of rights regarding their information, which parents may exercise on their behalf until the age when they are able to understand it, which the School assumes is from when they become Older Pupils. Some of your child's rights are as follows

- *Rectification*: If information is incorrect, you can ask us to correct it
- *Access*: You may 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 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 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 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
- *Objection*: You may object to us using your child's information where
 - o We are using it for direct marketing purposes; for example to send your child a School magazine
 - o The legal ground 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 grounds for using your information' earlier;
 - o 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 Tutor can give you more information about your Data Protection rights.

Parents of younger pupils should be aware that certain rights (including the right of access) are limited to your child's own personal data, and certain data is exempt. This will include information which identifies other individuals.

You may have heard of the "right to be forgotten" – see *Deletion* above. The School will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your child's personal data: for example, a legal requirement, or where it falls within a proportionate legitimate interest identified in this Privacy Notice. Generally, if the School still considers the processing of the personal data to be reasonably necessary, it is entitled to continue. All such requests will be considered on their own merits.

This Privacy 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.

Further Information and Guidance

Please see your child's Class Teacher or Form Tutor if you have further questions and if

- You object to us using your child's information for marketing purposes, we will stop using your child's information for marketing purposes if you tell us not to
- You would like us to update the information we hold about your child
- You would prefer that certain information is kept confidential

The School takes its obligations towards your child very seriously and has put in place extra safeguards to ensure that their personal information is kept safely and securely.

Please contact The Data Compliance Officer, via the School Office, if you have any questions regarding the contents of this Privacy Notice.

If you consider that, we have not acted properly when using your personal information you can contact the Information Commissioner's Office: www.ico.org.uk. Telephone 01625 5457453.