



Customer Privacy Notice

How We Use Your Information

1. WHAT THIS PRIVACY NOTICE IS FOR

This Notice is intended to provide information about how and why the College uses personal information about you. This Notice applies equally to current, past or prospective parents and guardians, or donors.

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

This Privacy Notice applies alongside any other information the College may provide about a particular use of personal data, for example when collecting data via an online or paper form. This Privacy Notice also applies in addition to the College's other relevant terms and conditions and policies including:

- any contract between the College and you;
- the College's Images Policy;
- the College's CCTV Policy;
- the College's Data Retention Policy;
- the College's Safeguarding and Child Protection Policy and Health and Safety Policies, including as to how concerns or incidents are recorded; and
- the College's IT policies, including its Pupil IT agreement.

2. 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. We may also hold information such as your religion or ethnic group. CCTV, photos and digital recordings of you are also personal information.

3. RESPONSIBILITY FOR DATA PROTECTION

The College and the College's commercial services are registered with the Information Commissioner's Office (ICO) as Data Controllers and are responsible for what personal data is collected, how it is used and for its protection. The College's registration number with the ICO is Z5846821.

The College has appointed the Head of Data as its Data Protection Officer who will deal with all your requests and enquiries concerning the College's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this Notice and Data Protection Law. Alumni should direct any requests regarding their personal data held by the Old Cliftonian Society to the College Data Protection Officer.



4. WHY THE COLLEGE NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to staff, pupils, parents and guardians and users of the college facilities, the College needs to process a wide range of personal data about individuals as part of its daily operation.

The College will need to carry out some of this activity in order to fulfil its legal rights, duties or obligations – including those under contract with its staff, or parents and guardians of its pupils. Other uses of personal data will be made in accordance with the College’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.

The College expects that the following uses will fall within that category of its “legitimate interests”:

- We obtain information about you from our admissions Registration Form and Acceptance Form, from your child’s previous College and we may also obtain information from professionals such as doctors and from local authorities for the purposes of pupil selection and to confirm the identity of prospective pupils and their parents.
- To provide our commercial services to the wider community.
- To provide education services, including musical education, physical training or spiritual development, career services and co-curricular activities to pupils, and monitoring pupils’ progress and educational needs;
- Maintaining relationships with alumni through the alumni organisation, the Old Cliftonian Society and the College community, including regular updates and fundraising activity. This may include information for Development purposes such as wealth screening.
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed by law such as tax, diversity or gender pay gap analysis;
- To enable relevant authorities to monitor the College’s performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the College;
- To safeguard pupils’ welfare and provide appropriate pastoral care;
- To monitor, as appropriate, use of the College’s IT and communications systems in accordance with the College’s Student Online Safety Policy ;
- To make use of photographic images of pupils in College publications, on the College website and, where appropriate, on the College social media channels in accordance with the College’s Images Policy. The context would be to promote the College to prospective parents, pupils and donors. These images may still be used after your child has left the College;
- For security purposes, including CCTV in accordance with the College’s CCTV Policy;
- To carry out or cooperate with any College or external complaints, disciplinary or investigation process; and



Where otherwise necessary for the College's purposes, including to obtain appropriate professional advice and insurance for the College.

Information about you may also be used for historical research or for statistical purposes.

In addition, the College will on occasion need to process special category personal data concerning health, ethnicity, religion, sexual life or criminal records information such as when carrying out DBS checks in accordance with rights or duties imposed on it by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons will include:

- To safeguard pupils' welfare and provide appropriate pastoral and where necessary medical care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: For example, for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of College trips who need to be made aware of dietary or medical needs;
- To provide educational services in the context of any learning development for a pupil;
- As part of any College or external complaints, disciplinary or investigation process that involves such data, for example if there are learning development, health or safeguarding elements; or
- For legal and regulatory purposes. For example, child protection, diversity monitoring and health and safety and to comply with its legal obligations and duties of care.

5. TYPES OF PERSONAL DATA PROCESSED BY THE COLLEGE

This will include, for example:

- Names, addresses, telephone numbers, e-mail addresses and other contact details;
- Vehicle details about those who use our car parking facilities;
- Bank details and other financial information; for example, about parents who pay fees to the College;
- To verify parents' identity and so that we can assess any application by a parent for the award of a bursary or for credit in contemplation of an agreement for the deferment of fees, we may search the files of any licensed credit reference agency who 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. Failure to supply information may result in a refusal of an award or credit;
- Past, present and prospective pupils' academic, disciplinary, admissions and attendance records, including information about any special needs, and examination scripts and marks;
- Where appropriate, information about individual's health and welfare, and contact details for next of kin;
- References given or received by the College about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- Correspondence with and concerning pupils and parents past and present; and
- Images of pupils and occasionally other individuals engaging in College activities, and images captured by the College's CCTV system in accordance with the College's Images and CCTV Policies.



6. HOW THE COLLEGE COLLECTS DATA

Generally, the College receives personal data from the individual directly including, in the case of pupils, from their parents. This may be via a form, or simply in the ordinary course of interaction or communication such as an e-mail or written assessments.

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

7. WHO HAS ACCESS TO PERSONAL DATA AND WHO THE COLLEGE SHARES IT WITH

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

- Professional advisers, for example lawyers, insurers, PR advisors, contractors and accountants;
- Government authorities, for example HMRC, DfE, police or the local authority; and
- Appropriate regulatory bodies, for example the Independent Colleges Inspectorate, the Charity Commission or the Information Commissioner.

The College will also share data with other areas of the Clifton College Education Group.

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

- Medical records held and accessed only by the College Health Centre and appropriate medical staff under their supervision, or otherwise in accordance with express consent; and
- Pastoral or safeguarding files.

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

Parents and Guardians are reminded that the College is, under duties imposed by law and statutory guidance, including Keeping Children Safe in Education, to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on safeguarding files, and, in some cases, referrals to relevant authorities such as the LADO or police. For further information about this, please view the College’s Safeguarding and Child Protection Policy available on the College’s website.

Finally, in accordance with Data Protection Law, some of the College’s processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the College’s specific directions. The College may share data outside the UK or European Economic Area (EEA) for medical reasons, such as dietary intolerances for pupils undertaking trips overseas.



8. USE OF ARTIFICIAL INTELLIGENCE

In order to enhance the college's operations, the college uses Closed Generative AI for reporting and analysis purposes and to assist staff with day-to-day tasks. Any personal data processed by AI systems will be handled in accordance with UK GDPR legislation and the principles outlined in this privacy notice. The college will ensure that appropriate safeguards are in place to protect your personal information, including limiting access to personal data, using anonymised data whenever possible, and regularly auditing AI systems for compliance. When personal data is used with AI, it is processed on the basis of the college's legitimate interests in providing an efficient and effective education and to look after your wellbeing, unless another lawful basis applies. The college will continue to ensure the security of your personal data by taking technical and organisational steps, such as establishing policies for technology use, device usage, and access to the college's systems. All staff and governors are made aware of their duties under Data Protection and receive relevant training. Should you have any questions or concerns regarding the use of AI, please contact the Data Protection Officer.

9. HOW LONG WE KEEP PERSONAL DATA

The College 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 pupil personnel files is until the pupil reaches 25 years of age. However, incident reports and safeguarding files will need to be kept much longer in accordance with specific legal requirements.

If you have any specific queries about how our retention policy is applied, wish to obtain a copy of the College's Document Retention Policy, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Data Protection Officer at DPA@cliftoncollege.com. However, please bear in mind that the College will often have lawful and necessary reasons to hold on to some personal data even following such request.

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

10. KEEPING IN TOUCH AND SUPPORTING THE COLLEGE.

The College and its alumni organisation will use contact details of parents, alumni and other members of the College community to keep them updated about the activities of the College, or alumni and parent events of interest, including by sending updates and publications, by email and by post. Unless the relevant individual objects, the College will also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the College community, such as the Old Clifton Society;
- Should you wish to limit or object to any such use, or would like further information about them, please contact the Data Protection Officer. You always have the right to withdraw consent, where given, or otherwise object to regular updates or fundraising. However, the



College is nonetheless likely to retain some of your details, not least to ensure that no more communications are sent to that particular address, email or telephone number.

11. YOUR RIGHTS

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the College, and in some cases ask for it to be erased or amended or have it transferred to others, or for the College to stop processing it – but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request to the Data Protection Officer.

The College will endeavour to respond to any such requests as soon as reasonably practicable and in any event within statutory time-limits which is one month in the case of requests for access to information.

The College will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the College may ask you to reconsider.

Requests that cannot be fulfilled

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals, this may include your own children, in certain limited situations, please see further below, or information which is subject to legal privilege, for example legal advice given to or sought by the College, or documents prepared in connection with legal action.

The College is also not required to disclose any pupil examination scripts or other information consisting solely of pupil test answers, provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the College itself for the purposes of the education of any individual.

You may have heard of the “right to be forgotten”. However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your or your child’s personal data: For example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

Pupil requests

Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the College, they have sufficient maturity to understand the request they are making, (see Whose rights? Below). A pupil of any age may ask a parent or guardian to make a subject access request on his/her behalf.



Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, the law still considers the information in question to be the child's; for older pupils, the parent making the request may need to evidence their child's authority for the specific request.

Pupils aged 12 and above are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home.

Parental requests

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about pupils without their consent. The College may consider there are lawful grounds for sharing with or without reference to that pupil.

Parents will in general receive educational and pastoral updates about their children. Where parents are separated, the College will, in most cases, aim to provide the same information to each person with parental responsibility, but may need to factor in all the circumstances including the wishes of the child.

Consent

Where the College is relying on consent to process personal data, any person may withdraw this consent at any time. Examples where we do rely on consent are certain types of uses of images and certain types of fundraising activity. Please be aware however that the College may not be relying on consent but have other lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice or may otherwise exist under some form of contract or agreement with the individual, for example the parent contract.

Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates. However, the College will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils; for example, under the parent contract, or via a form. Parents and pupils should be aware that this is not necessarily the same as the College relying on strict consent, (see section on Consent above).

Where consent is required, it may in some cases be necessary or appropriate, given the nature of the processing in question, and the pupil's age and understanding, to seek the pupil's consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

In general, the College will assume that pupil's consent is not required for ordinary disclosure of their personal data to their parents, for example, for the purposes of keeping parents informed



about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare. That is unless, in the College's opinion, there is good reason to do otherwise.

However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the College may be under an obligation to maintain confidentiality unless, in the College's opinion, there is a good reason to do otherwise; for example where the College believes disclosure will be in the best interests of the pupil or other pupils, or if required by law.

Data accuracy and security

The College will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the Data Protection Officer of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected and has the right to halt the processing of their personal data whilst any errors or omissions are corrected, subject to certain exemptions and limitations under Data Protection Law. Please see above for details of why the College may need to process your data and of who you may contact if you disagree.

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

This policy

The College will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

Queries and complaints

Any comments or queries on this policy should be directed to the Data Protection Officer using the following contact details DPA@cliftoncollege.com.

If an individual believes that the College has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the College's complaints procedure detailed in the Procedure on the handling of Parental Complaints policy located on the College's website. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO) at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, Tel: 0303 123 1113 or at: <https://ico.org.uk/concerns/>, although the ICO recommends that steps are taken to resolve the matter with the College before involving the regulator.