



# Privacy Notice for Older Pupils

## How We Use Your Information

### 1. WHAT IS THIS PRIVACY NOTICE FOR

This Notice is to help you understand how and why the College will 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.

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 is about you.

This includes information such as your name, date of birth and address as well as things like exam results, medical details, academic and behaviour records. The College may also record your religion or ethnic group. CCTV, photos and digital recordings of you are also personal information.

### 3. RESPONSIBILITY FOR DATA PROTECTION

The College is registered with the Information Commissioner's Office (ICO) as a Data Controller and is 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 support your Housemaster/Housemistress or parents in dealing with all your requests and enquiries concerning the College's uses of your personal data,(see section on Your Rights below), and try to ensure that all personal data is processed in compliance with this Notice and Data Protection Law.



#### **4. WHY THE COLLEGE NEEDS TO PROCESS PERSONAL DATA**

In order to carry out its normal duties to pupils, staff and parents and guardians, the College needs to process a wide range of personal data about you as part of its daily operation to provide you with an education and to look after your wellbeing.

The College will need to carry out some of this activity to fulfil what it is required to do by law, for example, to tell the local authority that you attend this College.

Other uses of personal data will be made in line with the College's legitimate interests or other people's legitimate interests so long as these interests do not harm you and that we are not using special or sensitive types of data which we will ask for your consent to use (see Consent section below). Here are the uses which the College expects to come under its "legitimate interests":

- So that we can properly manage the number of pupils we can admit to the College and can teach and care for you we obtain information about you from our Admissions forms such as the Registration and Acceptance forms. We get information from you, your parents and your teachers. Your previous school also gives us information about you.
- Sometimes we get information from your doctors and other professionals such as staff who work for the local authority where we need this to look after you.
- To provide education services, including music lessons, physical training, including sports, personal development, careers advice and co-curricular activities. These activities also involve monitoring your progress and educational needs.
- Maintaining contact with you about the College's activities once you leave the College through the alumni organisation. This will include regular updates and fundraising but will be subject to your consent, (see Consent section).

#### **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;
- Academic, disciplinary, admissions and attendance records, including information about any special needs and examination scripts and marks;
- References given or received by the College about you, and relevant information provided by your previous Colleges and/or other persons who have worked with you;
- Where appropriate, information about your health and welfare, and contact details for next of kin; for example, if you are allergic to something or might need extra help with some tasks;
- Correspondence with and concerning you;
- Images of you and occasionally other pupils engaging in College activities, and images captured by the College's CCTV system in accordance with the College's Images and CCTV Policies.
- To monitor, as appropriate, use of the College's IT and communications systems in accordance with the College's Pupil IT agreement.



## 6. HOW THE COLLEGE COLLECTS DATA

Generally, the College receives personal data directly from you or from your parents. This may be through a form, or simply in the ordinary course of day-to-day life at the College or through communication by e-mail or written assessments.

However, in some cases personal data will be supplied by other people. For example, from another College or other professionals or authorities who have been working with you; 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 needs to share your personal information with other people outside the College, such as:

- Professional advisors; for example lawyers, insurers, PR advisers, contractors and accountants;
- Government authorities; for example, the Department for Education, police or local authority;
- Appropriate regulatory bodies; for example, the Independent Colleges Inspectorate, the Charity Commission or the Information Commissioner; and
- Travel companies organising College trips (see processing activity below).

The majority of the time, personal data collected by the College will stay within the College, and will be processed by appropriate individuals on a “need to know” basis, that is they will only have access to your information if they have a genuine reason in relation to their work at the College.

There are particularly strict rules regarding access to:

- Medical records are held and accessed only by the College medical team and appropriate medical staff under their supervision, or otherwise with your express consent; and
- Pastoral or safeguarding files.

However, a certain amount of any Special Educational Needs pupil’s relevant information will need to be provided to staff more widely to allow them to provide the necessary care and education that pupil requires.

Finally, in accordance with Data Protection Law, some of the College’s processing activity is carried out on its behalf by other parties such as IT systems, web developers or cloud storage providers.

This is always done with written guarantees that personal data will be kept securely and only in accordance with the College’s specific directions.

## 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, ordinary pupil records will be kept up until you reach 25 years of age. However, incident reports and safeguarding files will need to be kept much longer.

If you have any specific queries about how our information 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](mailto: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 after you leave the College, we will need to keep a record of the fact in order to fulfil your wishes, this is called a "suppression record".

## **9. YOUR RIGHTS**

### **Right of access, etc**

You have various rights under Data Protection Law to access and understand personal data about you 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 conditions.

Anyone 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 in writing to the Data Protection Officer.

The College will try to respond to any such written requests as soon as reasonably practicable and whatever happens within statutory time limits which is one month for requests for access to information.

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



### **Requests that cannot be fulfilled**

Please 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 includes information which identifies other people or information which involves legal advice being given to or sought by the College.

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 your education.

The “right to be forgotten” – we will sometimes have important reasons to refuse specific requests to amend, delete or stop processing your personal data. For example, a legal requirement or where it falls within a legitimate interest as identified in this Notice.

### **Information requests by you:**

You can make subject access requests for your own personal data, provided that, in the reasonable opinion of the College, you are mature enough to understand the request you are making, (see Whose rights? Below). Or you can ask your parents or guardian to make a subject access request on your behalf.

If your parents make a subject access request they may need to show that they have your authority to make the request as your personal data is considered to be yours to access.

### **Parental requests**

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 you without your consent. The College may consider there are lawful grounds for sharing with or without reference to you. Parents will in general receive educational and pastoral updates about you. 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 your wishes.

### **Consent**

Where the College is relying on consent as a means to process personal data, anyone may withdraw this consent at any time. Examples where we do rely on consent are certain types of uses of images, health information, ethnicity details, your religion, sexual life or criminal records 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 mentioned in this Privacy Notice, or may exist under some form of agreement with you.

### **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 you, for example under the parent contract or via a form expressing your parents' consent. You 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 your age and understanding, to seek your consent and not your parents.

In general, the College will assume that your consent is not required for ordinary disclosure of personal data to your parents, for example, for the purposes of keeping them informed about your activities at College, academic progress and behaviour, and in the interests of your welfare. That is unless, in the College's opinion, there is good reason to do otherwise.

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

### **Data accuracy and security**

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

You have the right to request that any out-of-date, irrelevant or inaccurate information about you is erased or corrected and you have the right to halt the processing of your 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 you, 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. If you believe that the College has not complied with this policy or not acted in accordance with Data Protection Law you should use the College's Student Complaints policy located on the

College's website and should also notify the Deputy Head. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO) 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 (ICO).