

Privacy Notice for Parents, Carers and Guardians

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.

If you have any questions about this notice please contact the Bursar (contact details are provided at the end).

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. CCTV, photos and video recordings of you are also personal information.

How and why does St Christopher's 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 School's primary reason for using your personal information is to provide educational services to your child.

- 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 may have information about any family circumstances which might affect your child's welfare or happiness.
- We may need information about any court orders which relate to you. This is so that we can safeguard the welfare and well-being of your child and the other pupils at the School.
- We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as toilets.
- We may take photographs or videos of you at school events to use on social media and on the School website. This is to show prospective parents and 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.
- We may send you information to keep you up to date with what is happening at the School. For example, by sending you information about events and activities taking place (including fundraising events) and the School newsletter. Please see below under "Keeping in touch and supporting the School" for more information.
- We may use information about you if we need this for historical research purposes or for statistical purposes.

Financial information

- 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).

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- We may hold information about bankruptcy petitions and statutory demands.
- 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.
 - Failure to supply information may result in a refusal of an award or credit.
- We may obtain information about you from publicly available sources such as Companies House and Zoopla to assess your ability to pay School fees.

Sharing personal information with third parties

- In accordance with our legal obligations, we may share information with local authorities, inspectorates and the Department for Education, for example, where we have any safeguarding concerns.
- On occasion, we may need to share information with the police.
- We may also need to share information with our legal advisers for the purpose of obtaining legal advice.
- 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 information with them if this is relevant to their work.
- If your child is not of British nationality we have to make sure that your child has the right to study in the UK. We might have to provide information about you to UK Visas and Immigration to comply with our duty to Brighton College as a Tier 4 sponsor.
- We may share some information with our insurance company, for example, where there is a serious incident at the School.
- Some of the School's processing activity is carried out on our 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.
- If you have unpaid fees while your child is at the School we may share information about this with other schools or educational establishments to which you intend to send your child.
- If your child leaves us to attend another school we may need to provide that school with information about you. For example, details of family circumstances for safeguarding reasons.
- 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 School fees.
- We may need to share information if there is an emergency, for example, if you are hurt whilst on School premises.

Keeping in touch and supporting the School

The School is more than just a school – it is a community. The School and Parents' Association offers a thriving programme of activity and social events which you can participate in. We will use your contact details to keep you updated about the activities of the School and events of interest, including by sending updates and newsletters, by email and by post.

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You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. Please be aware that the School may need nonetheless to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

Our legal grounds for using your information

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

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Legitimate interests

The School relies on legitimate interests for most of the ways in which it uses your information. This means that the School uses your personal data in accordance with the legitimate interests of the School, or others, so long as these are not outweighed by the impact on you and does not involve special or sensitive types of data (as to which, see below).

Specifically, the School has a legitimate interest in:

- Providing educational services to your child.
- Safeguarding and promoting the welfare of your child (and other children).
- Promoting the objects and interests of the School. This includes fundraising and using photographs of you at our school 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 school fees are due.
- Facilitating the efficient operation of the School.
- Ensuring that all relevant legal obligations of the School are complied with.

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 School fees that are due to us.

Necessary for a contract

We will need to use your information in order to perform our obligations under our contract with you. 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

The School might need 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

For example, to prevent someone from being seriously harmed or killed.

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

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 School.
- Ensuring that we comply with all of our legal obligations.

The School 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

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orientation. Our legal grounds for processing information falling into these categories are listed below.

Substantial public interest

The processing is necessary for reasons of substantial public interest.

Vital interests

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

Social protection and social security laws

The School 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

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

If you have any questions or concerns about the School's legal grounds for processing your information, please speak to the Bursar.

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

In many cases we rely on more than one legal basis for a particular use of your information. For example we will rely on contract, legitimate interests and public interest bases when using your information to provide your child with an education.

The basis that we will rely on for a particular purpose may vary depending on the circumstances. For example, if we decide to tell the local authority something about a parent for safeguarding reasons, sometimes this will be because we have a legal obligation to do so but on other occasions we may tell the local authority because we are worried about the child even if we don't have a legal obligation to report something (in which case we would be relying on legitimate interests and public interests).

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

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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 speak to the Bursar if you would like to withdraw any consent given.

Sending information to other countries

We may send your information to other countries where:

- we store information on computer servers based overseas; or
- we communicate with you or your child when you are overseas (for example, during the summer holidays if you live in a different country).

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

If the country that we are sending 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) then it might not have the same level of protection for personal information as there is the UK.

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 Bursar.

How long do we keep your information for?

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 School, 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.

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 School.

In all cases, the School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate reason.

What decisions can you make about your information?

From 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 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.

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- 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; 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; or
 - we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of you at a School event for historical reasons.

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

Further information and guidance

This notice is to explain how we use your personal information. The Bursar is the person responsible at the School for managing how we look after personal information and deciding how it is shared.

Please speak to the Bursar if:

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

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.

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.

How to get in touch

- Call us on: 01273 735404
- Email: bursar@stchristophershove.org.uk
- Write to: The Bursar, St Christopher's School, 33 New Church Road, Hove, East Sussex, BN3 4AD