

Privacy Notice for Pupils

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.

We are giving you this notice because you are mature enough to make decisions about your personal information.

If you have any questions about this notice you can talk to any of the following: your tutor, Housemaster, the Deputy Head (Seniors) or the Bursar.

What is personal information?

Personal information is information that the School 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 and behaviour records. CCTV, photos and video recordings of you are also personal information.

How and why does St Christopher's School 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 you with an education and keep you safe.

- The admissions forms which your parents complete give us lots of personal information about you. We get information from you, your parents, your teachers and other pupils. Your old school also gives us information about you so 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.
- The staff who look after you need to know your medical information (such as allergies), and whether you require additional support with certain activities. This is to safeguard your welfare and provide appropriate pastoral (and where necessary, medical) care, including in the event of an emergency. We may need to share information about your health and well-being with the First Aiders, Counsellor or members of the School Health Centre team.
- Where there are safeguarding concerns we will share your personal information with social services, the police and other outside organisations.
- When the Independent Schools Inspectorate visit the school, we may share your personal details with them.
- As part of our pre-testing, CE and Scholarship examination process, we send your information to senior schools.
- CCTV is used around the school to ensure your safety. CCTV is not used in private areas such as changing rooms.
- We keep biometric information to enable you to take out books from the library.
- We share your name and gender with the companies that take our official photographs, so they can identify you and post you the correct image.

Privacy Notice for Pupils

- When you leave, we ask for your contact details. These enable us to keep in touch and update you with news from the School. Please see below under “Keeping in touch and supporting the School” for more information.
- To keep you informed about activities and sports fixtures, we share your name with the company that manages our online calendar.
- We may need to report some of your information to the government. For example, we may need to tell the local authority that you attend the School or let them know if we have any concerns about your welfare.
- We may need information about any court orders which relate to you. This is so that we can safeguard your welfare and well-being and the other pupils at the School.
- If you are from another country we have to make sure that you have the right to study in the UK. We might have to provide information to UK Visas and Immigration.
- Depending on where you will go when you leave us we may need to provide your information to other independent or State schools. For example, we may share information about your exam results and provide references. We may need to pass on information which they need to look after you.
- 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 classmates is injured at School or if there is a burglary.
- 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 you have misbehaved in a serious way and the police have become involved, we may need to use information about the action taken by the police.
- We may share some information with our insurance company to make sure that we have the insurance cover that we need.
- We may share your academic and (where fair) your behaviour records with your parents or guardian(s) so they can support your schooling.
- 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 will monitor your use of email, the internet and mobile electronic devices e.g. Chromebooks. This is to check that you are not misbehaving when using this technology or putting yourself at risk of harm.
- We may use photographs or videos of you for the School’s website 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 you have left the School.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- We publish our 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.

If you have concerns about any of the above please speak to your tutor, Housemaster/mistress, the Deputy Head (Seniors) or the Bursar.

Privacy Notice for Pupils

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 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.

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.

Privacy Notice for Pupils

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 the use does not involve special or sensitive types of data (as to which, see below).

The core purpose of the School is to provide you with an education whilst safeguarding and promoting your welfare and the welfare of other pupils.

Specifically, the School has a legitimate interest for the following uses:

- For the purposes of pupil selection and to confirm identity.
- To provide education services, 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 your parents for you to be at the School.
- Maintaining relationships with pupils and former pupils, including direct marketing or fundraising activity.
- Improving the School 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.
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate.
- Ensuring that all relevant legal obligations of the School are complied with (for example in relation to inspections).
- 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.
- To enable pupils to take part in national or other assessments, and to publish the results of examinations or other achievements of pupils.
- To safeguard and promote pupils' welfare and security and provide appropriate pastoral care.
- To monitor (as appropriate) use of the school's IT and communications systems.
- To make use of photographic images of pupils in School publications, on the School website and (where appropriate) on the School's social media channels, to let know about the School and what we do here.
- Using your information in connection with legal disputes.
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance.
- Making sure that the School is well managed and that we protect the School's reputation.

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

Where the School needs to use your information in order to comply with a legal obligation, for example to report a concern about your well-being 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.

Privacy Notice for Pupils

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)

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

The School may also process 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 orientation. The reasons why the School may need to process this information might 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 where it is in the individual's interests to do so: for example for medical advice, social services, insurance purposes or to organisers of school trips.
- To provide educational services in the context of any special educational needs of a pupil.
- To run any of its systems that operate on biometric data, such as for the Library and other forms of pupil identification.
- 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.

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

Privacy Notice for Pupils

Substantial public interest

The School 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 School 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 School is inspected.

Employment and social protection and social security law

There will be times when the School needs to use your information because we are an employer (e.g. we employ your teachers). Also the School will use your information to comply with social protection law (e.g. to look after you) and social security laws.

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.

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.

Medical purposes

This includes medical treatment and the management of healthcare services.

If you have any questions or concerns about the School's legal grounds for processing your information, please speak to your tutor, Housemaster, the Deputy Head (Seniors) or the Bursar.

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

In many cases we will rely on more than one basis for a particular use of your information. For example we will rely on legitimate interests and public interest bases when using your information to look after you and your classmates and when providing you 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 pupil because we are worried about their welfare, 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 pupil 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

Privacy Notice for Pupils

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 your tutor if you would like to withdraw any consent that you have 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 parents 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 you. We will keep some information after you have 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.

Privacy Notice for Pupils

- 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; or
 - 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.

Further information and guidance

This notice is to explain how we use your personal information. The Bursar is in charge of the School's data protection compliance. You can ask your tutor to speak to the Bursar or speak to the Bursar yourself. Alternatively, you can ask your parents to speak to us on your behalf if you prefer.

Please let your tutor know 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