

Privacy Notice for Younger Children

Introduction

This notice is to help parents of younger children understand **how** and **why** we collect your child's personal information and **what** we do with that information. It also explains the decisions that you can make about your child's information.

We are giving you this notice because you are able to exercise your child's data protection rights on their behalf. When your child is older they will be considered mature enough to exercise their own data protection rights. The School has produced a separate privacy notice for older pupils, which can be viewed here on the School website.

We encourage you to explain the effect of this notice to your child, particularly as the data protection rights in your child's information belong to them, even though you exercise them until they are older. If you or your child have any questions please contact the Bursar (contact details are provided at the end).

What is personal information?

Personal information is information that the School holds about your child and which identifies your child.

This includes information such as their date of birth and address as well as things like exam results, medical details and behaviour records. CCTV, photos and video recordings of your child 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 child's personal information is to provide them with an education and keep them safe.

- The admissions forms give us lots of personal information about your child. We get information from you, your child's teachers and other pupils. Your child's old school also gives us information about your child so we can teach and care for them.
- Sometimes we get information from your child's doctors and other professionals where we need this to look after your child.
- The staff who look after your child need to know their medical information (such as allergies), and whether they require additional support with certain activities. This is to safeguard their 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 child's health and well-being with First Aiders, Counsellor or members of the School Health Centre team.
- Where there are safeguarding concerns we will share your child's personal information with social services, the police and other outside organisations.
- When the Independent Schools Inspectorate visit the school, we may share your child's personal details with them.
- CCTV is used around the school to ensure your child's safety. CCTV is not used in private areas such as changing rooms.
- We keep biometric information to enable pupils to take out books from the library.

Privacy Notice for Younger Children

- We share your child's name and gender with the companies that take our official photographs, so they can identify your child and post you the correct image.
- When your child leaves, 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 child's name with the company that manages our email contact.
- We may need to report some of your child's information to the government. 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.
- We may need information about any court orders which relate to your child. This is so that we can safeguard your child's welfare and well-being and the other pupils at the School.
- If your child is from another country we have to make sure that they have the right to study in the UK. We might have to provide information to UK Visas and Immigration.
- Depending on where your child will go when they leave us we may need to provide your child's information to other schools, colleges and universities or potential employers. For example, we may share information about your child's exam results and provide references. We may need to pass on information which they need to look after your child.
- 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 a pupil 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 child's information with them if this is relevant to their work.
- 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.
- 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 child's academic and (where fair) behaviour records with you so you can support their schooling.
- 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 will monitor your child's use of email, the internet and mobile electronic devices e.g. Chromebooks. This is to check that your child is not misbehaving when using this technology or putting themselves at risk of harm.
- We may use photographs or videos of your child 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 your child has left the School.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- We publish our public 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.

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 your child can participate in. We will use your child's contact

Privacy Notice for Younger Children

details to keep them 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 child's 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 child's information.

Privacy Notice for Younger Children

Legitimate interests

The School relies on legitimate interests for most of the ways in which it uses your child's information. This means that the School uses your child's personal data in accordance with the legitimate interests of the School or others, so long as these are not outweighed by the impact on your child 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 your child with an education whilst safeguarding and promoting your child's 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, career services, 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.
- 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 your child and their 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; 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 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 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 parent or pupil.

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 your child's well-being to Children's Services. We may also have to disclose your child's information to third parties such as the courts, the local authority or the

Privacy Notice for Younger Children

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) ("PI")

This applies where what we are doing is for the benefit of people generally. The following are examples of where this applies:

- Providing your child and others 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 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 security 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 Younger Children

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 child's health to look after him / her. We may also use other types of special category personal data about your child to provide them with an education, to look after your child and their 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 child's information because we are an employer. Also the School will use your child's information to comply with social protection law (e.g. to look after your child) and social security laws.

Vital interests

In limited circumstances we may use your child's information to protect your child's vital interests or the vital interests of someone else (e.g. if your child or they are seriously hurt).

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. This applies whenever sharing special category data is necessary in relation to legal claims.

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 child's information, please speak to 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 child's information. For example, we will rely on legitimate interests and public interest grounds when using your child's information to look after your child and his / her classmates and when providing 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 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).

Privacy Notice for Younger Children

Consent

We may ask for your consent to use your child's information in certain ways as an alternative to relying on any of the grounds 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 on legitimate interests. 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 form teacher if you would like to withdraw any consent given.

Sending information to other countries

We may send your child's 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 child's 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 child's information for?

We keep your child's information for as long as we need to in order to educate and look after them. 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 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 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 child's information?

From May 2018 data protection legislation creates a number of rights regarding your child's information. Some of these are new rights whilst others build on existing rights. Your child's rights are as follows:

- Rectification: if information is incorrect you can ask us to correct it.

Privacy Notice for Younger Children

- Access: you can 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 your child, 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 your child 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 child's 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;
 - 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.

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

Further information and guidance

This notice is to explain how we use your child's personal information. The Bursar is in charge of the School's data protection compliance. Please speak to the Bursar if:

- You object to us using your child's information for marketing purposes e.g. to send your child information about School events. 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 will update this Privacy Notice from time to time. Any substantial changes that affect your child's 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 child's 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