

**DATED 29TH JANUARY 2021**

**CROSFIELDS SCHOOL TRUST LIMITED**

**("CROSFIELDS")**



**CROSFIELDS**  
**SCHOOL**

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**DATA PROTECTION PRIVACY NOTICE  
FOR PARENTS/ GUARDIANS**

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## **Updates**

This Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our information practices or relevant laws. We will post a notice on our website to notify you of any substantive changes to the way we collect and use information. We have indicated at the top of the Privacy Notice when it was last updated.

### **1. What is the purpose of this document?**

Crosfields is committed to protecting the privacy and security of your personal information.

This notice describes what personal data (information) we hold about parents and guardians, you, how we collect it, and how we use and may share information about you while your children are attending Crosfields and afterwards, in accordance with the Data Protection Act (2018). We are required by law to notify you of the information contained within this notice.

Please ensure that you read this notice (sometimes referred to as a '*privacy notice*') and any other similar notice we may provide to you from time to time when we collect or process personal information about you in order that you are aware of how and why we are using your personal information.

This notice applies to **current, past and prospective parents, guardians**, carers or fee payers ("guardians") regardless of whether it is in paper or electronic format. This **Privacy Notice** also applies in addition to the School's other relevant terms and conditions and policies.

### **2. Who collects the information**

Crosfields is a '*data controller*' and gathers and uses certain information about you. As a data controller, we are also responsible for deciding how we hold and use personal data about you. This information is also used by our affiliated entities and group companies, namely Crosfields School Trust Ltd and Crosfields School Enterprises Ltd, (our 'Group Companies') and so, in this notice, references to 'we' or 'us' mean Crosfields and the Group Companies.

### **3. Data protection principles**

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy and which confirm that all personal information we hold about you must be:-

- Used lawfully, fairly and in a transparent way;

- Collected only for valid purposes that we have clearly explained to you and not used in any way which is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only for as long as is necessary for the purposes we have told you about; and
- Kept securely.

#### **4. The kind of information we hold about you**

Personal data or personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed.

There are "*special categories*" of more sensitive personal data which requires a higher level of protection.

Personal data that we may collect, use, store and share (when appropriate) about parents includes, but is not restricted to:-

- personal details such as home address, contact details, identification documents, immigration status
- bank details
- images of parents engaging in School activities alongside pupils, staff and other individuals
- CCTV images for security purposes

We may also collect, store and use the following "*special categories*" of more sensitive personal information:-

- Information about your race or ethnicity, religious beliefs,
- Information about your health, including any medical condition, (only in very limited circumstances, where this may be relevant to the support and care we provide to your child(ren) and you will be notified of this separately) NOTE: We may collect information with regard to health, travel and contact with COVID-19 to keep staff and pupils safe in school.

## **5. How we collect the information**

We collect personal information about you from you, from your child(ren) and we may also receive information about from the pupil's previous school, local authority and/or the police.

We may sometimes collect additional information from third parties credit reference agencies or other background check agencies, the Home Office, your doctors or other medical professionals, automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV, remote access systems, email and instant messaging systems, intranet, telephones and voicemail.

## **6. How we will use information about you**

We will only use your personal information where the law allows us to. Most commonly, we will use your personal information in the following circumstances:-

- Where we need to in order to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights to not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:-

- Where we need to protect your interests (or someone else's interests) – this would include track and trace in respect of COVID-19;
- Where it is needed in the public interest or for official purposes.

We need all the categories of information in the list outlined within section 4 above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information for other permitted reasons, outlined in the list above. The situations in which we will process your personal information are listed below. We have indicated by letters (see key above) the purpose or purposes for which we are processing or will process your personal information:-

We use this data to:

- administer admissions to the School
- communicate with parents
- support applications for Tier 4 Student Visas.

- carry out financial transactions, including Bursary applications and fraud or anti-money laundering checks
- other reasonable purposes relating to the operation of the School
- ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

#### **7. Do we need your consent?**

We do not need your consent if we use your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights under law. However, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

#### **8. How we may share the information**

We may also need to share some of the above categories of personal information with other parties, such as external contractors and our professional advisers and with potential purchasers of some or all of our business or on a re-structuring. Usually, information will be anonymised but this may not always be possible. We may also be required to share some personal information with the local authority and the Department of Education as well as with our regulators and/or as required to comply with the law.

The following activities are carried out by external contractors/advisers: Bursary applications, debt administration of school fees and IT services.

We will not normally share personal data of the Parents, Guardians, Carers or Fee Payers with anyone else, but may do so where:

- There is an issue with a pupil or parent/carer that puts the safety of a pupil or our staff at risk
- We need to undertake financial transactions
- We need to liaise with other agencies
- to compile statistical information (normally provided on an anonymous basis)

- to safeguard pupils' welfare and provide appropriate pastoral (and where relevant, medical and dental) care for pupils
- where specifically requested by pupils and/or their parents or guardians
- where necessary in connection with learning and extra-curricular activities undertaken by pupils e.g. **educational visits**, peripatetic teachers, residential trip providers, extra-curricular providers
- Our suppliers or contractors need data to enable us to provide services to parents- for example, IT support

We will also share personal data with law enforcement and government bodies where we are legally required to do so, including for:

- The prevention or detection of crime and/or fraud
- The apprehension or prosecution of offenders
- In connection with legal proceedings
- Where the disclosure is required to satisfy our safeguarding obligations
- Research and statistical purposes, as long as personal data is sufficiently anonymised, or consent has been provided

We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our pupils or staff.

All third-party service providers and other entities with whom we share data are required to take appropriate security measures to protect your personal information in line with our policies and is bound by confidentiality obligations. We do not allow our third-party service providers to use your personal data for their own purposes unless the law permits them to. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **9. Where information may be held**

Information may be held in physical form or electronically at school, and premises of our Group Companies, and third party agencies, service providers, representatives and agents as described above.

## **10. How long we keep your information**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects

of your personal information are available in our retention policy which is available from the Bursar. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## **11. Your rights to correct and access your information and to ask for it to be erased**

### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Privacy Officer [privacy@crofields.com](mailto:privacy@crofields.com).

### **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **12. Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way, altered or disclosed. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## **13. How to complain**

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance. To make a complaint, please contact the Privacy Officer [privacy@crofields.com](mailto:privacy@crofields.com).

If not, contact the Information Commissioner at [ico.org.uk/make-a-complaint/](https://ico.org.uk/make-a-complaint/) or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.



#### **14. Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

**If you have any questions about this privacy notice, please contact The Privacy Officer on [privacy@crossfields.com](mailto:privacy@crossfields.com).**

Please note we are still waiting on clarity around data protection post BREXIT and will continue to operate in accordance with the principles laid down prior to 31 December 2020 until such time as further guidance is provided by HM Government.