



PRIVACY NOTICE FOR ROSARIANS (ALUMNI) AND FRIENDS OF CLIFTON HIGH SCHOOL

Notice applies to Alumni	
Date notice reviewed:	05.06.2025
Date of next review	17.05.2026
Version:	06.25 v1
Author:	Finance Director
Owner	Finance Director

Version	Date	Section	Material change	Approval
09.24 v1	09.09.2024	1	Section updated.	Mr Michael Stewart
06.25 v1	05.06.2025	7.1	Examples of types of personal data collected updated.	Mr Michael Stewart
		8.1	Examples of legitimate interests updated.	
		9.3	New section added re. sharing special category personal data.	
		10 & 11	Sections updated.	

Clifton High School is committed to child protection and safeguarding children and young people and expects all staff, visitors and volunteers to share this commitment.

1. Who are we?

We are Clifton High School (the **School**), a company registered in England and Wales with company number 00011701 and charity number 311736. Our trading activities are operated through Clifton High School Trading Limited, a company registered in England and Wales with company number 15391308 and our community relationship, fundraising and alumni activities are operated by The Clifton High School Foundation (the **Foundation**), registered with charity number 1201516. The registered office for each entity is Clifton High School, College Road, Bristol BS8 3JD.

School Office 0117 973 0201
schooloffice@cliftonhigh.co.uk

College Road, Bristol, BS8 3JD
cliftonhigh.co.uk

Admissions 0117 933 9087
admissions@cliftonhigh.co.uk

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This Privacy Notice applies to the activities of the School, Clifton High School Trading Limited and the Foundation. References in this Notice to the School (or 'we') are references to the School and, where the context requires, to Clifton High School Trading Limited and/or the Foundation.

2. Who does this Privacy Notice apply to?

This Privacy Notice applies to former pupils, former members of staff and former governors ("Alumni") and also to parents and grandparents of former pupils, grandparents of current pupils and other friends of Clifton High School (referred to in this policy as 'Alumni and Friends' or 'you').

3. Child Protection and Safeguarding

Child protection and safeguarding requirements always supersede data protection legislation. If information needs to be shared in the interests of child protection and safeguarding, this Privacy Notice can never be used as a reason not to do so. Copies of the School's Child Protection and Safeguarding policies can be found on the School website.

4. About this Privacy Notice

The School collects, uses and holds ("processes") your personal data and is the data controller of your personal data. This Privacy Notice is intended to provide information about how and why we collect personal data about you and what we do with it. It also explains what your rights are in relation to your personal data.

Personal data is information that identifies you as an individual and relates to you. This includes your contact details, next of kin and financial information.

This Privacy Notice applies alongside any other information the School may provide to you about a particular use of personal data, and applies in addition to the School's other relevant terms and conditions and policies, including:

- the School Terms and Conditions;
- the Data Protection Policy and the Data Retention and Disposal Policy;
- the Child Protection and Safeguarding policies;
- the CCTV policy; and
- the School's IT policies including the Acceptable Use of ICT Policy and Online Filtering and Monitoring policy.

5. Responsibility for data protection

The School has appointed the Finance Director as the Data Protection Lead, whose role is to monitor that all personal data is processed in compliance with this Privacy Notice and the principles of the applicable data protection legislation.



Any questions about the operation of this Privacy Notice or any concerns that the Privacy Notice has not been followed should be referred in the first instance to the Data Protection Lead (finance@cliftonhigh.co.uk/0117 973 0201/Extension 227).

6. How we collect your information

The School will usually receive personal data relating to you either from you directly or from your parents/your child or grandchild (as appropriate), for example in a completed form, an email or in the course of an interaction or communication. However, in some cases your personal data will be supplied by third parties, for example by another alumni, or from publicly available sources as part of exercises to improve the quality of the data we hold or to contact those with whom the School has lost touch. The School will also collect information by way of its systems and processes, for example on the School's CCTV system, when you come on site, and other IT systems, including our online filtering and monitoring systems, should you make use of the School's guest Wi-Fi provision.

7. The types of personal data we collect and process

7.1 Personal data

The personal data that the School may collect and process includes:

- contact and communications information, such as your name, address, telephone number, e-mail address, other contact details;
- the year you joined and left the School and your roles and responsibilities while at the School;
- records of communications and interactions with you;
- bank details and other financial information (e.g. about Alumni and Friends who make donations or pay to attend ticketed events, and any anti-money laundering information we are required to collect by law);
- images of Alumni and Friends engaging in School events, and images captured by the School's CCTV system (in accordance with the School's CCTV Policy).

7.2 Special category personal data

The School may on occasion also need to collect and process special category personal data concerning dietary requirements for example, in accordance with rights or duties imposed on us by law, or from time to time by explicit consent where required. Examples of the reasons why we collect special category personal data are set out in section 9 below.

8. The legal justification for processing your personal data

The School needs to process your personal data as part of our daily operations, but we will only process your personal data where it is lawful for us to do so. There are a number of grounds on which we are lawfully allowed to process your data, and they are the following:



8.1 Legitimate interests

The School will process your personal data where it is necessary for the School's (or sometimes a third party's) legitimate interests. This is the most common ground on which we process personal data. When we process data because it is necessary for the School's legitimate interests, it must not involve special or sensitive types of data (unless you give consent), and we must balance our legitimate interests with your privacy, interests, rights and freedoms.

The School expects that the following uses will fall within the "legitimate interests" category:

- maintaining relationships with Alumni and Friends, including organising social events, fundraising and direct marketing;
- for the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests;
- to promote the School to prospective parents and pupils;
- to make use of photographic images of you in School publications, on the School's website and on the School's social media channels;
- for the purposes of planning and forecasting, research and statistical analysis, including that imposed or provided for by law;
- to monitor (as appropriate) use of the School's IT and communications systems;
- for security purposes, including CCTV in accordance with the School's CCTV policy;
- to carry out or cooperate with any School or external complaints, disciplinary or investigation process; and
- where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the school.

8.2 Consent

We may ask for your consent to process your personal data as an alternative to relying on legitimate interests or one of the bases below. For example, we may ask for your consent before taking or using photographs and videos of you if the photograph or video is more intrusive than would usually be expected and we cannot rely on legitimate interests for that use.

If we ask for your consent to use your personal data you can withdraw this consent at any time.

8.3 Performance of a contract

The School will process your personal data in order to fulfil our legal rights, duties and/or obligations under our any contracts we have with you.

8.4 Legal obligation

The School may process your personal data to comply with our legal obligations, for example, in order to comply with child protection and safeguarding legislation, Keeping Children Safe in Education and the School's Child Protection and Safeguarding policies.

8.5 We have a vital interest

The School will process your personal data if it is necessary to protect your life. For example, information you have provided to us relating to any medical conditions you have.

8.6 Public interest

The following are examples of when we use your information to perform tasks in the public interest:

- the preservation and creation of materials for permanent deposit in the School's archive;
- safeguarding and promoting the welfare of pupils at the School;
- facilitating the efficient operation of the School;
- prevention and detection of crime; and
- ensuring that the School complies with all of its legal obligations.

9. Special category personal data

9.1 Additional conditions required for processing

We will process special category personal data in a lawful, fair and transparent way and will process it under one of the grounds set out in section 8 of this Privacy Notice. In addition, we will only process special category personal data if one of the following conditions applies:

- you have given us your explicit consent to do so, but only in circumstances where seeking consent is appropriate; or
- you have already made the data publicly available; or
- it is necessary:
 - for the purposes of carrying out obligations under social protection law;
 - to protect your vital interests (if you are not legally able to give consent);
 - for the establishment, exercise or defence of legal claims, such as where any person has brought a claim or serious complaint against us or you.
 - to comply with public health requirements;
 - in connection with some function in the substantial public interest; or
 - for archiving, which is in the public interest or is for historical research purposes.

9.2 Reasons for processing special category personal data

The reasons for collecting special category personal data include:



- to safeguard your welfare: for example to ensure best practice in fundraising activities is maintained and for caterers or organisers of events who need to be made aware of dietary or medical needs;
- to take appropriate action in the event of an incident, accident or emergency;
- to comply with public health requirements;
- to comply with our legal obligations, duties of care regulatory requirements; and
- to allow the School to make insurance claims.

9.3 Access to and sharing special category data

The School is under statutory duties to record and report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness. For example, the School may be required to share special category personal data relating to safeguarding concerns with the Local Authority Designated Officer, Children's Services, CAMHS and/or the police.

The School is also required to share a pupil's child protection file, along with any other information which the School's Designated Safeguarding Lead considers material to the ongoing care needs of the pupil, if a pupil leaves the School to join another school or college. This could include special category personal data relating to you.

10. Who does the School share personal data with?

Personal data collected by the School will usually remain within the School and will be processed by appropriate members of staff in accordance with access protocols (i.e. on a 'need to know' basis). However, the School will share personal data with the Foundation and vice versa, where required. There are also some functions which are outsourced by the School, including certain IT, cloud storage, records management and monitoring activities, and community management functions. In accordance with data protection law this type of third-party data processing is subject to contractual assurances by the third party that personal data will be kept securely and processed and used in accordance with the law.

In addition, from time to time, the School will need to share personal data relating to Alumni and Friends with third parties, such as:

- data cleansing service providers;
- JustGiving and HMRC, in relation to Gift Aid;
- other schools when you/your child leaves the School;
- Local Authority Designated Officer and/or the Police, if legally required to do so.



11. The Clifton High School Foundation (the “Foundation”)

The School may share some of your personal data (including your contact details) with the Foundation, so that the Foundation can keep you updated about School activities or events of interest, and its marketing and fundraising activities.

The Foundation may contact you by post and/or email for marketing purposes or in order to promote and raise funds for the Foundation and, where appropriate, other worthy causes. However, you have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. Should you wish to limit or object to any such use, or would like further information, please contact the Director of Development by email development@cliftonhigh.co.uk, alternatively you can visit www.cliftonhighfoundation.co.uk or telephone 0117 933 9081 to update your preferences.

If you withdraw consent or object to direct marketing or fundraising, the Foundation will retain some of your details to ensure that no more communications are sent to that particular address, email address or telephone number.

12. How long your information is kept for

The School will retain personal data securely, and will retain it for as long as it is needed for the purposes set out in this Privacy Notice or for as long as the law requires us to. The specific periods of time are set out in the School’s Data Retention policy.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Data Protection Lead using the contact details set out above. However, please bear in mind that the School will often have lawful and necessary reasons to retain some personal data following such request.

A limited and reasonable amount of information will be kept for archiving purposes in the public interest, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of that fact in order to fulfil your wishes (called a "suppression record").

13. Rights

13.1 Your rights

You have the following rights:

- Right to be informed about the collection and use of your personal data



- Right to obtain access to and copies of the personal data that we hold about you ("subject access request")

You have the right to obtain access to and copies of the personal data that we hold about you. The School will be able to respond more quickly to smaller, targeted requests for personal data made during term time. If the request is excessive or similar to previous requests, the School may ask you to reconsider or require a reasonable fee for the administrative costs of complying with the request, or in certain cases refuse the request (if permitted under data protection law).
- Right to require us to correct personal data we hold if it is incorrect

The School will endeavour to ensure that all personal data held is as up to date and accurate as possible, but you have the right to request that any out-of-date, irrelevant or inaccurate information about you is erased or corrected, and you should let the School know if you believe that data is inaccurate or not up to date. The School will not (subject to data protection law) necessarily delete or amend views, opinions, notes or records purely on the request of an individual who disputes the account, although we may keep a record of all parties' viewpoints.
- Right to require us (in certain circumstances) to erase your personal data

A request for a "right to be forgotten" will be considered on its own merits. Such a request may be refused if processing is necessary for one of a number of specific reasons, for example, to comply with a legal obligation or where it falls within a proportionate legitimate interest identified in this Privacy Notice. Generally, if the School still considers the processing of the personal data to be reasonably necessary, it is entitled to continue.
- Right to restrict our data processing activities
- Right to obtain and reuse the personal data that we hold for you
- Right to object to any of our particular processing activities

You may object where you feel the processing activity has a disproportionate impact on your rights.



You can find out more about your rights under applicable data protection legislation from the Information Commissioner's Office website available at www.ico.org.uk.

13.2 Limits to your rights

The rights set out in section 13.1 are not absolute, and the availability of the rights will depend on the lawful grounds on which we are processing your personal data (as set out in section 8).

In addition, the rights listed in 13.1 are limited to your own personal data, and certain data is exempt. This will include information which identifies other individuals (which may include your children), or information which is subject to legal privilege (for example legal advice given to or sought by the School, or documents prepared in connection with legal action, or where a duty of confidence is owed by a legal adviser).

13.3 Responding to the exercise of your rights

The School will endeavour to respond to any requests as soon as is reasonably practicable and in any event within statutory time-limits, which is generally one month, but fulfilling more complex or multiple requests, for example those involving third party information, may take one to two months longer.

14. Security

The School will take appropriate technical and organisational steps to ensure the security of personal data, including policies around the use of technology and devices, and access to school systems.

All staff are made aware of this policy and their duties under data protection legislation and receive relevant training.

15. Queries and complaints

Any comments or queries about this Privacy Notice should be directed to the Finance Director using the following contact details: finance@cliftonhigh.co.uk / 0117 973 0201 / Extension 227.

If you believe that the School has not complied with this Privacy Notice or acted otherwise than in accordance with data protection law, you should notify the Finance Director. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to attempt to resolve the matter with the School before involving the regulator.

Version history

Version	Date	Section	Material change	Approval
05.23 v1	17.05.2023	All	Notice updated and sections re-drafted.	Mr Michael Stewart
09.24 v1	09.09.2024	1	Section updated.	Mr Michael Stewart
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