Pembroke Education

Distinctive Schools, Shared Purpose

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

Notice applies to Alumni	
Date notice reviewed:	01.09.2026
Date of next review	01.06.2028
Version:	11.26 v1
Author:	Group Finance Director
Owner	Group Finance Director

Version	Date	Section	Material change	Approval
09.26 v2	01.09.2026	All	Privacy notice references updated on formation of Pembroke Education.	Mr Michael Stewart
11.26 v1	23.11.2026	9.4 and 10.3	Updated to reflect new statutory information sharing duty.	Mr Michael Stewart

Pembroke Education 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 Pembroke Education, a charitable company registered in England and Wales with company number 00011701 and charity number 311736.

Pembroke Education incorporates Clifton High School, The Downs Preparatory School and Downs School Enterprises Limited (company number 10801425), through which we operate Bertie's Nursery School, together with Pembroke Education Trading Limited (company number 15391308) and the community relationship, fundraising and alumni activities of The Clifton High School Foundation (the **Foundation**) (charity number 1201516), and the Charltonians, an unincorporated organisation. The registered office for all our entities is College Road, Bristol BS8 3JD.

Each entity is responsible for handling personal data in accordance with data protection law and is registered with the Information Commissioner's Office (ICO) where required. Pembroke Education is registered with the ICO under number Z7520007. Pembroke Education Trading Limited, The Downs School Enterprises Limited and The Foundation are also registered as Data Controllers with the ICO under registration numbers ZB770850, ZA323880 and ZA301767 respectively.

In this privacy notice we refer to Pembroke Education as 'We' where the syntax requires it. For ease of reference, this Policy may also refer to 'each School', 'Schools' or 'School' interchangeably as the context requires.

2. Who does this Privacy Notice apply to?

This Privacy Notice applies to former pupils, former members of staff and former governors of Clifton High School ("**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

Pembroke Education 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.

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

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

5. What is personal data?

Personal data is information that Pembroke Education holds about you that identifies you as an individual and includes your name, data of birth, address and contact details.

6. Responsibility for data protection

Pembroke Education has appointed the Group 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). Information relating to our complaint's procedure is set out in section 16 below.

7. How we collect your information

We 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. Pembroke Education 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.

8. The types of personal data we collect and process

8.1 Personal data

The personal data that we 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;
- your last individual school photo;
- 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).

8.2 Special category personal data

Special category personal data is personal data that needs more protection because it is sensitive. We may on occasion need to collect and process your special category personal data, for example your dietary requirements and allergies. Examples of the reasons why we collect special category personal data are set out in section 10 below.

9. The legal justification for processing your personal data

We need 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:

9.1 Legitimate interests

We will process your personal data where it is necessary for Pembroke Education'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 our 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.

Examples of purposes for processing personal data which are justified under legitimate interests, as recognised by law or determined by us, are set out below:

- maintaining relationships with Alumni and Friends, including organising social events, fundraising and direct marketing;
- for the purposes of donor and potential donor due diligence (wealth screening);
- to promote the School to prospective parents and pupils;
- to make use of photographic images and video content of you for identification purposes and 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) your use of IT and communications systems;
- for security purposes, including CCTV in accordance with CCTV policies;
- to carry out or cooperate with any internal or external complaints, disciplinary or investigation process; and
- where otherwise reasonably necessary for Pembroke Education's purposes, including to obtain appropriate professional advice and insurance.

9.2 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.

9.3 Performance of a contract

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

9.4 Legal obligation

We will process your personal data to comply with our legal obligations, including those relating to employment, child protection and safeguarding, charity law, taxation and accounting requirements. This includes compliance with statutory guidance such as *Keeping Children Safe in Education* and *Information Sharing Duty: Statutory Guidance for Safeguarding Organisations and Practitioners* and with our Child Protection and Safeguarding Policies

9.5 Vital interest

We 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.

9.6 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;
- facilitating the efficient operation of the School;
- prevention and detection of crime; and
- ensuring that Pembroke Education complies with all of its legal obligations.

10. Special category personal data

10.1 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;
- it is necessary to protect your or another person's vital interests;
- you have already made the data publicly available;
- it is necessary in connection with a substantial public interest, including:
    - the safeguarding of children or vulnerable people;
    - to prevent or detect unlawful acts;
    - to protect the public, pupils or parents from improper conduct, malpractice, incompetence or unfitness in a role, or failures in services provided by Pembroke Education (or to establish the truth of any such allegations);
    - to co-operate with a relevant professional or regulatory body;
- it is necessary to comply with public health requirements;

- it is necessary 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; or
- it is necessary for archiving, which is in the public interest or is for historical research purposes.

10.2 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;
- for legal and regulatory purposes (for example child protection and health and safety) and to comply with our legal obligations and duties of care;
- to take appropriate action in the event of an incident, accident or emergency; and
- to allow Pembroke Education to make insurance claims.

10.3 Sharing special category data

Pembroke Education 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, we may be required to share special category personal data relating to safeguarding concerns with the Local Authority Designated Officer, and/or the police.

The School is also subject to a specific statutory duty to share information with certain organisations where it is relevant to safeguarding and promoting a child's welfare. This information may be about the child or another named individual connected to a child, such as another child or an adult. There is no threshold of risk or harm that needs to be met to trigger this duty and the only exception to it is in rare circumstances where sharing information would be more detrimental to the child than not sharing it. Where the duty applies, confidential information can be shared without consent.

In addition to the above, we may be required to share special category personal data with, for example, its insurers, its lawyers, the ISI, the DfE, the TRA and/or the Home Office.

11. Who do we share personal data with?

Personal data collected by Pembroke Education will usually remain within the organisation and will be processed by appropriate members of staff in accordance with access protocols (i.e. on a 'need to know' basis). However, we may share personal data with the Foundation and vice versa, where required. There are also some functions which are outsourced, 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;
- wealth screening service provider(s);
- 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.

12. The Clifton High School Foundation

The School will share some of your personal data (including your contact details and your last individual school photo) with the Foundation, so that the Foundation can identify you and 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. The Foundation may also collect information from publicly available sources about your background, occupation and activities and analyse it alongside the personal data we already hold about you in order to understand our alumni and who our potential donors might be. This process is often known as wealth screening and allows us to engage with our alumni community more effectively.

You have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising, including wealth screening. 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.

13. How long is your information kept for?

Pembroke Education 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 Data Retention and Disposal 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, 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").

14. Rights

14.1 Your rights

You have the following rights:

- **To be informed about the collection and use of your personal data.**
- **To obtain access and copies of the personal data that we hold** (subject access request)
  You have the right to obtain access to and copies of the personal data that we hold about you. We will be able to respond more quickly to smaller, targeted requests for
- **To require us to correct personal data we hold if it is incorrect.**
  We 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 us know if you believe that data is inaccurate or not up to date.

  We 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.
- **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.
- **To restrict our data processing activities (in certain circumstances).**
- **To obtain personal data that we hold for you for the purpose of transmitting it to another data controller.**
- **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**.**
- **To complain to us about a data protection issue.**
- **To object to direct marketing.**
- **To withdraw one's consent where we are relying on it for processing your personal data.**

Pembroke Education 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.

16. Complaints

If you believe that Pembroke Education has not complied with this Privacy Notice or has acted otherwise than in accordance with data protection law, you should email the Clerk to the Governors at ncridland@cliftonhigh.co.uk with details of your complaint. The School will acknowledge your complaint within 30 days of receipt and will investigate and inform you of the outcome of your complaint without undue delay (keeping you informed of progress as necessary).

If you are not satisfied with the outcome of your complaint, or if you feel the School has not handled it appropriately, you have the right to complain to the Information Commissioner's Office (ICO).

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Version history

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