



Holiday Camp Privacy Notice

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Responsible person: Operations and Compliance Director

References: Data Protection Policy and Compliance Procedures for Staff (L19)
Information and Records Retention Policy and Procedures (L43)

Policy Number: [L5X]

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.

If you have any questions about this notice please contact Carol Robinson, the School's Operations and Compliance Director on 01372 384422.

What is personal information?

Personal information is information that identifies you as an individual and relates to you.

This includes your contact details, next of kin and financial information. We will also hold information such as your religion or ethnic group. CCTV, photos and video recordings of you are also personal information.

Our legal bases for using your information

This section contains information about the legal bases that we are relying on when handling your information.

The two tables below contain a general description of the different legal bases but we have also used a colour code system so that you can see which bases we are relying on for each of the purposes described at paragraphs 1 to 24 below.

Legitimate interests ("L")

This means that the School is using your information when this is necessary for the School's legitimate interests except when your interests and fundamental rights override our legitimate interests.

Specifically, the School has a legitimate interest in:

- providing the Holiday Camp to your child and to other children;
- safeguarding and promoting the welfare of your child, other children and our employees;
- promoting the objects and interests of the School. This includes fundraising and using photographs of you at our Holiday Camp events in promotional material. It also includes making sure that we are able to enforce our rights against you, for example, so that we can contact you if unpaid fees are due;
- keeping the school buildings safe;
- using your information in connection with legal disputes. For example, if you or your child bring a claim against the School or the Holiday Camp;
- protecting the School's and the Holiday Camp's reputation;
- facilitating the efficient operation of the School; and
- ensuring that all relevant legal obligations of the School and Holiday Camp are complied with (for example in relation to inspections).

In addition your personal information may be processed for the legitimate interests of others.

Necessary for contract ("CT")

We will need to use your information in order to perform our obligations under our contract with you (in the case of the Holiday Camp the Booking Form and Terms and Conditions) and for you to perform your obligations as well. For example, we need your name and contact details so that we can contact you if there is a concern.

Legal obligation ("LO")

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

Vital interests ("VI")

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

Performance of a task carried out in the public interest (or carrying out public tasks) ("PI")

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

- safeguarding and promoting your welfare, your child's welfare and the welfare of other children;
- facilitating the efficient operation of the School and Holiday Camp; and
- ensuring that we comply with all of our legal obligations.

The School must also comply with an additional condition where it processes 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.

Substantial public interest ("SPI")

The School is also 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.

Social protection and social security laws

Also the School may use your information to comply with social protection law (e.g. to look after your child) and social security laws. Social protection law is concerned with preventing, managing and overcoming situations that adversely affect people's wellbeing.

Vital interests ("VI")

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

Legal claims ("LC")

We are allowed to use your information if this is necessary in relation to legal claims. For example, this allows us to share information with our legal advisors and insurers.

How and why does the 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 letters highlighted in different colours below refer to the legal bases we are relying on. Please see the section above for an explanation.

1. The School's primary reason for using your personal information is to provide the Holiday Camp to your child - **LI**, **CT**, **PI**, **SP**.
2. We use CCTV to make sure the School site is safe. Images captured of you via CCTV will be your personal information. CCTV is not used in private areas such as toilets - **LI**, **CT**, **PI**, **SP**.

3. If there is a complaint or grievance made to the School which involves you then we will use your information in connection with that complaint or grievance - LI, PI, SPI.
4. We may take photographs or videos of you at School events to use on social media and on the School and Holiday Camp website. This is to show other families what we do here and to advertise the Holiday Camp. - LI.
5. We may send you information to keep you up to date with the Holiday Camp. For example, by sending you information about events and activities taking place (including fundraising events) - LI.
6. We may use your information when ensuring network and information security, for example, our anti-virus software might scan files containing information about you - LI.

Financial information

7. We will process financial information about you in relation to the payment of the cost of the Holiday Camp. - LI, CT.
8. We may search the files of any licensed credit reference agency in order to verify your identity. - LI, CT.

Sharing personal information with third parties

9. In accordance with our legal obligations, we may share information with local authorities, Ofsted, the Independent Schools Inspectorate and the Department for Education, for example, where we have any safeguarding concerns or to comply with our legal obligations - LI, LO, PI, SPI.
10. On occasion, we may need to share information with the police for the prevention and investigation of crime and the prosecution of offenders. We will only do this in specific circumstances to assist the police with their investigations - LI, CT, LO, PI, SPI.
11. We may need to share information about you with the Health and Safety Executive (a government organisation) if there is a health and safety issue at the School - LI, LO, PI, SPI.
12. In certain circumstances, we may also need to share information with our legal advisers for the purpose of obtaining legal advice - LI, LO, PI, SPI, LC.
13. Occasionally we may use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly (e.g. our accountants). We might need to share your information with them if this is relevant to their work - LI, CT, PI, SPI.
14. The School is a charity which means that in exceptional circumstances we may need to share your information with the Charity Commission e.g. in the event of a serious incident - LI, LO, PI, SPI.
15. We may share some information with our insurance company, for example, where there is a serious incident at the School - LI, SPI, LC.
16. We may share information about you with others in your family, such as another parent or step-parent. For example, where this is part of our obligation to take care of your child, as part of our wider legal and regulatory obligations - LI, PI, SPI.
17. We may need to share information if there is an emergency, for example, if you are hurt whilst on school premises - LI, VI.

We sometimes use contractors to handle personal information on our behalf. The following are examples:

- IT consultants who might access information about you when checking the security of our IT network; and

- we use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the School site.

We obtain information about you from the Holiday Camp Booking Form.

More than one basis

As you will see from this notice, in some cases we will rely on more than one basis above for a particular use of your information. In addition, we may move from one of the legal bases listed above to another as circumstances change. For example, as a safeguarding matter becomes more serious, we may start to rely on legal obligation to share personal information with the local authority in addition to the other legal bases which are noted for safeguarding purposes.

Consent

We will 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 will ask for your consent before using photographs and videos. You can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please speak to Carol Robinson, the School's Operations and Compliance Director, if you would like to withdraw any consent given.

Sending information to other countries

In certain circumstances, we may send your information to other countries which do not have the same level of protection for personal information as there is in the UK. For example, we may store your information on cloud computer storage based overseas based overseas.

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en

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 Operations and Compliance Director.

For how long do we keep your information?

We keep your information for as long as we need to look after your child. We will keep some information after your child has ceased attending the Holiday Camp, 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.

Please ask for our Information and Records Retention Policy for further information about what type of information we hold and the retention period.

What decisions can you make about your information?

Data protection legislation gives you a number of rights regarding your information. Your rights are as follows:

- **Rectification:** if information the School holds about you 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.

- **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. This applies where (a) the information has been provided by you; (b) the basis that we are relying on to process your information is consent or contract (please see "Our legal bases for using your information" above); and (c) the information is being processed by us on computer.
- **Restriction:** our use of information about you may be restricted 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 (e.g. to send you the School magazine);
 - the legal basis on which we are relying is either legitimate interest or performance of a task carried out in the public interest. Please see the section "Our legal bases for using your information" above; and
 - we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of you at a school event for historical reasons.

The School's Operations and Compliance Director can give you more information about your data protection rights.

Further information and guidance

The Operations and Compliance Director is the person responsible at St John's School for managing how we look after personal information and deciding how it is shared. Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly. This notice is to explain how we use your personal information. The Operations and Compliance Director can answer any questions which you may have.

This privacy notice does not, and is not intended to, give you any rights which you did not already have. For example, it does not give you any additional contractual rights.

Please speak to the Operations and Compliance Director if:

- you object to us using your information for marketing purposes e.g. to send you information about the School and Holiday Camp events. We will stop using your information for marketing purposes if you tell us not to; or you would like us to update the information we hold about you; or
- you would prefer that certain information is kept confidential.

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.