



ST LAWRENCE
COLLEGE

How We Use Your Child's Information Holiday Camp Privacy Notice for Campers & Parents - Full

St Lawrence College

May 2018

Introduction

This notice relates to campers and their parents/guardians to help understand **how** and **why** we collect your personal information relating to you/your child and **what** we do with that information. It also explains the decisions that you can make about this information.

We are giving you this notice for your own personal data protection but also because you are able to exercise your child's data protection rights on their behalf. When your child is older (usually when they reach the age of 12) they will be considered mature enough to exercise their own data protection rights, so please let them read this policy.

If you have any questions about this notice please talk to the Bursar.

What is "personal information"?

Personal information is information that the Holiday Camp holds about your child and which identifies your child and contact information for parents and guardians as well as emergency contacts.

This includes information such as your contact details, your child's date of birth, as well as things like medical details and dietary requirements. CCTV, photos and video recordings of your child are also personal information.

How and why does the Holiday Camp 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. Our primary reason for using your child's information is to ensure the safety of your child.

The online account you create in order to enrol your child into our Holiday Camp requires you to provide personal information about you and your child.

We collect this information to help the Holiday Camp run properly, safely and to let others know what we do here. Here are some examples:

- We need to tell all appropriate members of staff if your child is allergic to something or might need extra help with some tasks.
- We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms.
- 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 Holiday Camp or let them know if we have any concerns about your child's welfare.
- We may need information about any court orders or criminal petitions which relate to your child. This is so that we can safeguard your child's welfare and wellbeing and the other children at the Holiday Camp.
- 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 one of your child's fellow campers is injured at camp or if there is a burglary.
- 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 police.

- We may use photographs or videos of your child for the School's website and social media sites or prospectus to show prospective campers what we do here and to advertise the Holiday Camp. We may continue to use these photographs and videos after your child has left the Camp.
- If you have any concerns about us using photographs or videos of your child please speak to the Commercial Co-ordinator.
- We may publish news on the website to tell people about what we have been doing.

If you have any concerns about the above, please speak to the Commercial Co-ordinator.

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.

Legitimate interests

This means that the processing is necessary for legitimate interests except where the processing is unfair to your child. The Holiday Camp relies on legitimate interests for most of the ways in which it uses your child's information.

Specifically, the Holiday Camp has a legitimate interest in:

- Providing child care during the school holiday periods
- Safeguarding and promoting your child's welfare and the welfare of other children
- Promoting the objects and interests of the Holiday Camp
- Facilitating the efficient operation of the Camp
- Ensuring that all relevant legal obligations of the Camp are complied with.

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 camper.

If you object to us using your child's information where we are relying on our legitimate interests as explained above please speak to the Bursar.

Legal obligation

Where the Camp needs to use your child's information in order to comply with a legal obligation, for example to report a concern about your wellbeing 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

For example, to prevent someone from being seriously harmed or killed.

Public interest

The Camp considers that it is acting in the public interest when providing childcare.

The School must also comply with an additional condition where it processes special categories of personal information. These special categories include: personal information

revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about sex life or orientation.

Substantial public interest

The processing is necessary for reasons of substantial public interest.

Vital interests:

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

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.

Medical purposes

This includes medical treatment and the management of healthcare services.

We may ask for your consent to use your child's information in certain ways. 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 the Commercial Co-ordinator if you would like to withdraw any consent given.

For how long do we keep your child's information?

We keep your child's information for as long you require our services as a provider of childcare during the school holiday periods. Your account will stay active until such a time as you choose to delete it. We will keep attendance registers and accident forms after your child has ceased to use the camp, for example, so that we can find out what happened if you make a complaint. We will keep them for up to two years from the attendance date.

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.

What decisions can you make about your child's information?

From 25 May 2018 you will be able to make various decisions about your child's information. Some of these are new rights whilst others build on your child's existing rights. Your child's rights are as follows:

- if information is incorrect you can ask us to correct it;
- you can also ask what information we hold about your child and be provided with a copy. 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;

- 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;
- you can ask us to send you, or another organisation, certain types of information about your child in a format that can be read by computer;
- our use of information about your child 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.

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 look after your child's personal information. The Bursar can answer any questions that you might have.

Please speak to the Bursar if:

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

If you consider that we have not acted properly when using your child's personal information you can contact the Information Commissioner's Office: <http://www.ico.org.uk>