

Privacy notice for older pupils

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Introduction

This document helps you to understand **how** and **why** we collect your personal data and **what** we do with it. It also explains the decisions that you can make about your personal data. If you have any questions about this notice please talk to your form tutor.

What is 'personal data'?

Personal data is information about you. It includes your name, date of birth and address as well as things like exam results, medical details, unique pupil number and information about how well you behave. CCTV images, photos and video recordings of you are also your personal data.

Some types of data, like your health or religious beliefs, are considered 'special' under the law. We take extra care to keep this information safe and only use it when it is absolutely necessary to look after you.

Where we get your personal data from and who we share it with

We get your personal data from lots of different places such as your teachers, parents, your old schools and any future school, other pupils and their parents, as well as from people outside of the School such as the government, like the local authority. They might give us information that we need to look after you.

Sometimes, we will also share information with these people and organisations, for example, we will tell your parents about how well you are doing at school.

Below, we give lots of examples of where we get your personal data from, and who we share it with.

Why we use your personal data and our lawful bases for doing so

The School uses your personal data to:

1. Teach and educate you and other pupils;
2. Look after you and other people such as other pupils;
3. Make sure that you and others are behaving properly;
4. Make sure that the School complies with the law, our other obligations, and to look after the School.
5. To tell people about the School and what we do, for example, we may use photographs of you to advertise the School including on our website or in social media.

We can only use your personal data if we have a good reason to do so (having a "lawful basis"). Our lawful bases are as follows:

- **Legitimate interests:** This means that the School is using your information where this is necessary for the School's legitimate interests or someone else's legitimate interests. Legitimate interests apply to all of the 5 purposes listed above.
- **Public task:** This allows the School to use personal data to help the School do its job as a school, for example, to teach and look after you. This basis applies to purposes 1, 2, 3 and 4 above.
- **Recognised legitimate interests:** the School can rely on this basis where it needs to process your child's personal data for certain pre-approved purposes e.g. preventing crime.

- **Legal obligation:** Sometimes we have to use your personal data because the law says we have to. For example, to tell the Government if we were worried about you. This applies to purpose 3, and in some cases, purpose 4, in the list above.
- **Vital interests (emergencies):** Although this won't happen very often, we may need to use your information to protect you or someone else in an emergency.

The section below contains more information about our purposes for using your personal data and the lawful bases.

In more detail

Here we give you examples of how and why the School uses your personal data, where we get it from and who it is shared with. It does not contain anything different to what we have said above, but goes into more detail.

We have used colours to help you see which lawful bases we are using. **LI** means legitimate interests, **PT** means public task, **LO** means legal obligation, **RLI** means recognised legitimate interests and **VI** means vital interests (an emergency). So, if we have **(LI, PT)** that means we are using both legitimate interests and public task for that purpose.

- 1 The School's primary reason for using your personal data is to provide you and other pupils with an education **(LI, PT)**.

Admissions and when you start at school

- 2 We use your personal data before you start at our school, for example, making sure that any reasonable adjustments/suitable arrangements are made for you when you visit, marking your entrance exams and learning more about you from your parents before you join the School **(LI, PT, LO)**.
- 3 The admissions forms which your parents complete give us lots of personal data about you such as your name, contact details, disabilities, any particular difficulties you have with work, hobbies and interests, medical information (such as information about an allergy) and family circumstances **(LI, PT, RLI, LO)**.
- 4 We may let your old school know if you have been offered a place with us. This will help your old school to see what happens to their pupils when they leave, which will help them improve for the future. **(LI)**.
- 5 Your old school also gives us information about how well you did and any difficulties you had so that we can teach and care for you **(LI, PT, RLI, LO)**.

During your time at school

- 6 We get information from you, your parents, your teachers and other pupils.
- 7 Sometimes we get information from your doctors and other professionals where we need this to look after you **(LI, PT)**.
- 8 We will share information about you with teachers and other people at the school, for example:
 - 8.1 We may need to tell some of your teachers if you have a health issue and use your

medical information to look after you (LI, PT, LO).

- 8.2 We will need to tell your teachers if you have special educational needs or need extra help with some things (LI, PT, LO).
- 8.3 We will use information about your wellbeing to look after you (LI, PI, LO, RLI).
- 8.4 We will need to share information about you (for example, about your health and wellbeing) with the School doctor, our medical staff or counsellor (LI, PT, LO, VI, RLI, EM).
- 8.5 We will share information about your allergies so that we can look after you (LI, PT, LO, VI).
- 8.6 If we have information that you have a disability, we will use the information to adjust and to support you (LI, PT, LO).
- 9 Where appropriate, the School will have information about your religious or other beliefs and practices. For example, if you do not eat certain foods (LI, PT, LO).
- 10 We will also hold information such as your religion or ethnic group for the purposes of providing spiritual education in the context of any religious beliefs and, for example, child protection, diversity monitoring and health and safety) and to comply with our duty of care (LI, LO, PT).
- 11 We will use information about your gender and sex to provide support and to help us to meet your needs (LI, LO, PT).

Monitoring and keeping you and others safe

- 12 We use personal data to make sure the school site and buildings are safe, for example, monitoring who is on the school site at any given time (LI, PT, RLI).
- 13 The School will also use your personal data to safeguard and promote your welfare and the welfare of others (for example, so that we can look after you if you are hurt) (LI, PT, VI).
- 14 We record your attendance and if you have time away from the School we record the reason(s) why (LI, PT).
- 15 We use CCTV to make sure the School site is safe. We may also use CCTV to help with complaints and any incidents (for example, where pupils have been misbehaving or someone has been injured). CCTV is not used in private areas such as changing rooms, toilets or boarding houses. For more information about our use of CCTV please see the Security, CCTV and Pupil Safety Policy which is available on the School's website. (LI, PT, RLI).
- 16 In line with the school's obligations, we have online monitoring and filtering systems in place. When you use school computers (including iPads), both on and off the school campus, we can see what websites and apps you have visited. We can also see what is being said in documents, in emails and in other messages that you have sent or received. This helps us make sure you are safe and not looking at anything that could be harmful or upsetting (LI, PT).
- 17 These protective measures do not end when a school term does, our remote monitoring of school devices extends during school holidays, ensuring a safe online environment away from School. The checks are done by teachers and other staff at the School and we also use software that does

these checks automatically (LI, PT).

- 18 As part of our safeguarding duty, we also monitor and look at your use of technology on your personal mobile device(s) while connected to the School WiFi. The purpose of this is to safeguard you from inappropriate or harmful content, protect the School's network and to encourage responsible use of technology (LI, PT).
- 19 We also have special filters that block certain websites and content. This means some websites won't open at school because we want to protect you from seeing things that are not safe or appropriate (LI, PT).
- 20 We must make sure that our computer systems are working well and are secure. This may involve information about you, for example, our anti-virus software might scan files containing information about you (LI).
- 21 If you would like more information about our approach to online safety and monitoring, you can read the Acceptable use of IT policy, the IT Transparency Statement, or speak to your form tutor. (LI, RLI, LO, PT)

Sharing information about you

- 22 We share personal data with doctors, nurses and other experts, for example, if we need to do this to look after you or in relation to pupil immunisations (LI, LO, PT).
- 23 We will need to share some information about you with the government (for example, the Department for Education). We will also need to share your personal data with the local authority, for example, to tell them that you attend the School, if you leave the School or let them know if we have any concerns about your welfare. The local authority may also share information with us for these reasons (LI, LO, PT, RLI).
- 24 We may need to share information about you with regulators, who are responsible for things such as checking that the School is a good school and that it keeps people safe. Here are some examples:
 - 23.1 The Health and Safety Executive if there is a health and safety issue at the School (LI, LO)
 - 23.2 The School is a charity which means that we may need to share your information with the Charity Commission which checks how we are behaving as a charity. We may also share your information with the Fundraising Regulator if this is relevant to their work (LI, PT, LO).
 - 23.3 The School is sometimes inspected to make sure that we are continuing to be a good school. We will have to make your information available to the inspectors to help them to carry out their job (LI, PT, LO).
- 25 We might need to know if there are legal matters involving you or your family, including any special rules from the court. For example, if one of your parents has to collect you from school on certain days. This is so that we can look after you and the other pupils at the School (LI, PT, LO, RLI).
- 26 If you are from another country we have to make sure that you have the right to study in the UK. Sometimes the government will ask us to provide information as part of our reporting requirements. In addition to this we have a duty to provide information about you to UK Visas and Immigration who are part of the government (LI, LO, PT).

- 27 Additionally, if you are sponsored by us under a Child Student or Student visa we will have to provide information about you to UK Visas and Immigration to comply with our duties as your sponsor (LI, LO, PT).
- 28 Depending on where you will go when you leave us we will provide your information to other schools, colleges and universities, UCAS or potential employers. For example, we will share information about your exam results and provide references. Any references that we provide or receive will be treated as confidential which means that you will not usually be provided with a copy (LI, PT).
- 29 We may pass on information to your next school to help them look after you, for example, information about any concerns we have had about your welfare (LI, LO, PTRLI).
- 30 When you take public examinations (for example GCSEs) we will need to share information about you with examination boards. For example, if you require extra time in your exams (LI, PT). We may share your public exam results with your parents (LO, PT).
- 31 If someone makes a complaint about the School or a member of staff, or if there is a dispute, then we may need to use your personal data to investigate and respond. We might also have to share your personal data with the government and regulators if they become involved, for example, if they need to decide if a teacher should be able to teach anymore (LI, PT, LO).
- 32 The School may share the Education, Health and Care Plan EHCP with the local authority to provide support to you. (LI, PT, LO).
- 33 Sometimes we hire someone from outside of the School to provide activities. For example, this could be a teacher who does not normally work for the School or it could be a company that provides outdoor activities. We may share your personal data with them, for example, to tell them what sports you are good at (LI, PT).
- 34 We will share your personal data with the governors of the School if it concerns something they should know about or the information will enable them to fulfil their role as a governor. For example, this will apply if you have done something really well or if there is a problem at the School they need to know about (LI, PT).
- 35 We may need to share information about you with the police (and with others who do a similar job to the police), if something has gone wrong or to help with an enquiry. For example, if one of your classmates is injured at School or if there is a burglary, or if you or someone else have misbehaved in a serious way (LI, PT, LO, RLI).
- 36 We use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We will share your personal data with them if this is relevant to their work (LI, PT).

We may share some information with our insurers if there has been an incident or to make sure that we have the insurance that we need (LI, PT).

If the School is dealing with a request for information, query, or complaint, we may sometimes need to share your information with the other people involved such as other pupils and their parents (LI, LO, PT).

Parents based outside of the UK will sometimes choose someone to help them during the admissions process (this person is usually called an overseas agent). If this applies to you, your parents may give the overseas agent information to pass on to the School. The School will sometimes share information

with the overseas agent, for example, we may send them the letter telling your parents that we are offering you a place so that they can give this to your parents (LI).

We will share information about how well you are doing (for example, progress in lessons) and (where fair) information about your behaviour with your parents or education guardian so they can support your schooling (LI, PT).

If you have behaved badly in relation to one of your classmates (for example, if we suspect bullying) then we might share information with that pupil's parents (for example, what sanction you have been given) (LI, PT).

If we ever decide to change how we are run, then we may share your personal data with others involved. For example, if we decide that another charity will run the School, then we will share your personal data with the charity (LI).

We use others to handle personal data on our behalf for the following purposes:

42.1 IT consultants who help run the School's computer systems. For example, they might need to access a file containing personal data when investigating a fault or checking the security of our IT network;

42.2 Caterers may have information about any food allergies or intolerances that you have;

42.3 We use software, apps and websites to help us with teaching, and to help us provide pastoral support to you and your classmates. The School will undertake the necessary checks before sharing your personal data with any technology providers.

42.4 We may use third party "cloud computing" services to store some information rather than the information being stored on hard drives on the School site.

42.5 To support your education, we may ask you to sign up to Generative Artificial Intelligence (AI) platforms using your School credentials. You must follow the School's guidance on the safe and appropriate use of AI.

We may share your personal data with anyone who works with the third parties mentioned above.

Anyone that we share information with may give us information about you as well.

Photographs, videos and promoting the school

37 You might have seen that the School often publishes photos and videos of our pupils. We might put these photos and videos on our website, on our social media pages and in our advertising, for example, our prospectus. We do this to show people (such as pupils thinking of coming to our school) what we do here and to advertise the School. We will check that you are happy for us to do this (LI).

38 We may continue to use these photos and videos after you have left the School (LI).

39 If we would like to use a photo or video in a more unusual or high profile way (for example on a banner or billboard) we will speak to you about this first.

40 Sometimes we use photos and videos for teaching purposes, for example, to record a drama lesson (LI, PT).

41 If you have concerns about us using photographs or videos of you please speak to your form tutor.

- 42 We may use your personal data in order to help make the School better. For example, after you have the school, we might send you information on how you can donate to the School (LI). For more information, please see the Cranleigh Giving privacy notice. This can be found on our website.
- 43 We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing (LI).
- 44 We will keep you updated about what is happening at the School after you have left. This includes telling you about events and activities and to find out how you are getting on. We may also pass your details onto the alumni organisation which is called the Old Cranleigh Society. Further information on the alumni association can be found here <https://www.ocsociety.org/> (LI). We will speak to you before you leave the School to confirm that you are happy for us to pass your details on. For more information about how we use your personal data after you have left the School please see the Old Cranleigh Society privacy notice. This can be found on our website [here](#).
- 45 As part of the school's permanent records, we may keep data such as your name, year of admission and date of leaving the school, together with any particular academic or other achievements (LI, PT).
- 46 We also keep some information forever for archiving purposes and for historical research purposes. For example, we keep some old photographs so that we have a record of what the School was like in the past as this helps get people interested in the School's history. Information held in our archive may be made publicly available but this would only be done in compliance with data protection laws (LI, PT).
- 47 If you are 16 years or older, and are a boarder, we might share your personal data with the local authority so that they can register you to vote in elections (LO).

Consent

We may sometimes ask for your consent to use your personal data. For example, we may ask for your consent to email you about a fundraising event.

If you give us your consent to use your personal data, you can change your mind at any time. Please speak to your form teacher if you would like to withdraw any consent that you have given.

Sending information to other countries

When the School sends personal data outside of the UK, we have to consider if the other country has the same level of protection for personal data as there is in the UK. Some countries are considered by the UK Government to have adequate rules and this includes all of the European Economic Area and some other countries, such as, New Zealand, Norway, Switzerland and Argentina.

The School sends your personal data to countries with adequate rules when we, for example:

- go on a trip to France and share your personal data with activity providers and the hotel; and
- store your personal data in cloud computer storage with servers in Ireland

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

We will provide you with details about where we are sending your personal data, whether the country

has an adequacy decision and, if not, 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 Data Protection Lead.

For how long do we keep your personal data?

We keep your information for as long as we need to in order to teach and look after you. We will keep a lot of information after you have left the School, for example, so that we can find out what happened if you make a complaint.

In some cases, 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 see our Information & Records Retention Policy for more detailed information. This can be found on our website.

What decisions can you make about your personal data?

Data protection legislation gives you a number of rights regarding your personal data. You can ask us to:

- correct your personal data if you think there is a mistake or if something is missing, for example, if we have the wrong address for you;
- give you a copy of your personal data and certain other information relating to your personal data. This is known as a subject access request;
- delete your personal data, for example, where we no longer need your personal data;
- share your personal data with someone else;
- limit how we use your personal data, for example, whilst we check whether there is a mistake in your personal data; and
- object to how we use your personal data where:
 - we are using it for direct marketing purposes for example to send you an email about a fundraising opportunity;
 - our lawful basis is either legitimate interests, recognised legitimate interests or public task. Please see the section "Our lawful bases for using your personal data" above; and
 - if we ever use your personal data for scientific or historical research purposes or statistical purposes.

Your form teacher can give you more information about your data protection rights. Please note that these rights do not apply in all cases and we will not always have to comply with your request. For example, if we keep a record because we are worried about you then we will often need to keep this even if you ask us to delete it.

Further information and guidance

This notice is to explain how we look after your personal data. Your form teacher can answer any questions which you might have.

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 and lawfully.

Please speak to your form teacher if:

- you would like to exercise any of your rights listed above; or

- you would like us to update the information we hold about you; or
- you have any concerns about how your personal data is used or shared.

If you have any concerns about how we have handled your personal data, please contact us and complete our complaints form so that we have an opportunity to put things right. We have published our Data Protection Complaints Policy on our website. You also have the right to complain to the [Information Commissioner's Office](#)

You can ask your form teacher to speak to the Data Protection Lead or contact the Data Protection Lead yourself at dataprotectionlead@cranleigh.org. Alternatively, you can ask your parents to speak to us on your behalf if you prefer..

If we ask you to tell us something and you do not do so then this may make it more difficult for us to teach and look after you and others.