

PRIVACY NOTICE FOR PARENTS

Version Control

Policy Status	Completed ▾	Last Updated	31 Jul 2025
Publish Status	Internal ▾	Last SMT review (where applicable)	📅 Date
Owner	ANWYL, Claire	Next Review	31 Jul 2026
Scope of Policy	Whole School ▾	Frequency of Review	Annual ▾

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Introduction

This privacy notice is for parents and carers of our prospective, current and former pupils. Where the notice refers to "parents" this includes all individuals with overall responsibility for pupils, such as biological or adoptive parents, those with parental responsibility and/or those who care for a pupil.

This privacy notice provides key information about how and why we collect your personal data, and what we do with that information. It 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.

If you have any questions about this notice please contact the Data Protection Lead at dataprotectionlead@cranleigh.org

What is 'personal data'?

Personal data is information that is about you and from which you can be identified. For example, information about your family circumstances, your financial information and images of you.

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

We obtain your personal data from a number of different sources. We receive a lot of information directly from you, for example when you complete the application form. We also receive information from other sources such as our teachers, your child, your child's previous schools, other members of your family, other pupils and their parents, as well as from individuals outside of the School such as the local authority.

We will also share information with these individuals and organisations where appropriate. For example, if you tell us about something that has happened at home, we may share this with your child's teachers if it is relevant. The sections below contain further information about where we get your personal data from and with whom it is shared.

The purposes for which we use your information and the lawful bases

We use your information in order to:

1. carry out our obligations and enforce our rights under our contract with you;
2. teach your child and other pupils;
3. look after your child and others, including other pupils;
4. enable the School to comply with its legal obligations, support the management and operation of the School and to advance and protect the School's interests, objectives and reputation; and
5. fundraise, market and promote the School, for example, by writing to you about fundraising for a new school project

Our lawful bases for using your personal data are as follows:

- **Contract:** We need to use your information to meet our obligations under our contract with you and so that you can meet your obligations to us. For example, we need your name and contact details so that we can update you on your child's progress and so that we can contact you if there is a concern. We may also rely on this basis if you have asked us to take steps prior to entering into a contract with us.
- **Legitimate interests:** This means that the School is using your personal data where this is necessary for the School's legitimate interests or someone else's legitimate interests. Specifically, the School has a legitimate interest in educating and looking after its pupils, complying with its agreement with you for your child to be at the School, enforcing our rights

against you, for example, by contacting you if school fees remain unpaid, investigating if something has gone wrong and protecting promoting and improving the School. This basis applies to all of the five purposes listed above.

- **Public task:** This allows the School to use personal data where it is necessary in order to perform a task in the public interest. This basis applies to purposes 2, 3 and 4 above. For example, we are performing a task in the public interest when we teach and look after your child.
- **Legal obligation:** The School may need to use your information in order to comply with a legal obligation, for example, to report a concern about your child's wellbeing to Children's Services or in connection with inspections. Occasionally we may have a legal obligation to share your personal data with third parties such as the courts, local authorities or the police. More detail of when we will do so is set out below.
- **Vital interests:** In limited circumstances we may use your information to protect your vital interests or those of another person, for example, to prevent someone from being seriously harmed or killed.

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

Our purposes and lawful bases in more detail

This section provides more detail about the purposes for which your personal data is used, the applicable lawful bases as well as further information about sources and recipients.

We have used a colour coded system so that you can see which bases we are relying on for each of the purposes described at paragraphs 1 to 45 below. **LI** means legitimate interests, **CT** means contract, **PT** means public task, **LO** means legal obligation and **VI** means vital interests. So, if we have (**LI**, **PT**) that means we are relying on both legitimate interests and public task for that purpose.

- 1 The School's primary reason for using your personal data is to provide educational and pastoral services to your child (**LI**, **CT**, **PT**).
- 2 As part of your child's education, the School may share their relevant personal data with IT/software service providers, for example, Google, Microsoft and other App providers. The School will undertake appropriate due diligence before sharing your child's personal data with any third party technology platforms (**LI**, **PT**).
- 3 To support your child's education, we may ask your child to sign up to Generative Artificial Intelligence (AI) platforms using their School credentials. Pupils must follow the School's guidance on the safe and appropriate use of AI (**LI**, **PT**).
- 4 We will use information about you to process your child's admission application. This information comes from admissions forms, your child's previous schools and/or nurseries, and sometimes from professionals such as doctors and local authorities (**LI**, **CT**, **PT**).
- 5 We will hold information about any family circumstances which might affect your child's welfare or happiness. This helps us provide appropriate care and support to your child (**LI**, **CT**, **PT**).
- 6 We may use medical information about you when necessary to look after your child (**LI**, **CT**, **PT**).
- 7 We will hold information about any court orders or criminal petitions which relate to you. This is so we can safeguard the welfare and wellbeing of your child and the other pupils at the School (**LI**, **CT**, **PT**).
- 8 We use CCTV to help keep the School premises safe and for crime detection and

prevention. We may also use CCTV in relation to complaints and any incidents which take place on our sites (e.g. accidents involving vehicles in our car park(s)). Images captured of you via CCTV will be your personal data. CCTV is not used in private areas such as toilets or changing rooms (LI, CT, PT, LO).

- 9 We will use your personal data to take other steps to make sure the school site and buildings are safe, for example, we keep a record of visitors to the school premises at any given time (LI, PT, LO).
- 10 If there is a complaint or grievance made to the School that involves you then we will use your information in connection with that complaint or grievance (LI, PT).
- 11 The School may share information about you with the local authority for the purpose of the preparation, implementation and / or review of your child's Education and Health Care Plan (LI, PT, LO).
- 12 Where appropriate, the School will hold information about your religious or other practices, for example, dietary restrictions (LI, PT).
- 13 We may 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 legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.
- 14 We may use your personal data to help improve the School, for example, to raise money for the School (LI). For more information, please see our Cranleigh Giving privacy notice.
- 15 We may take photographs or videos of you at School events to use on social media and on the School website. This is to show prospective parents and pupils what we do and to promote the School. We may continue to use these images after your child has left the School (LI).
- 16 We will send you information to keep you up to date with what is happening at the School, for example, by sending you information about events and activities taking place (including fundraising events) and the School newsletter (LI).
- 17 We will keep your address details after your child leaves the School to keep you informed about school events and activities, and to follow your child's progress. (LI).
- 18 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).
- 19 We monitor our pupils' use of the internet and email as part of our safeguarding duties. This may sometimes involve your personal data, e.g. if you have sent your child a message to their School email address (PT).
- 20 We also keep some information indefinitely for archiving purposes (referred to as "archiving in the public interest" under data protection law) and for historical research purposes. For example, we retain some old images to record what the School was like in the past. Information held in our archive may be made publicly available, but only in compliance with data protection laws.
- 21 We may use your information in connection with legal disputes, for example, we may have to disclose your personal data as part of court proceedings (LI, PT, LO).

Financial information

- 22 We will process information about you in relation to the payment of fees and for risk

management and compliance purposes. In some cases, we may receive information from third parties such as credit reference agencies or your child's previous school(s) and/or nurseries (LI, CT).

- 23 We may ask you to provide evidence of your identity, such as a copy of your driving licence or passport. This is so that we have a record of who is paying the fees for anti-money laundering purposes (LI).
- 24 We will hold information about bankruptcy petitions and statutory demands, where relevant (LI, CT).
- 25 We may search the files of licensed credit reference agencies to verify your identity. This also helps us assess your application for a bursary or for credit to defer fees. The credit reference agency will keep a record of that search and details about your application. This record may be visible to other organisations that carry out searches about you (LI, CT).
- 26 We may share your information with debt recovery agencies if you do not pay any school fees owed to the School (LI, CT).
- 27 We may obtain information about you from publicly available sources, such as Companies House and Zoopla, to verify your identity or other personal details and assess your ability to pay School fees (LI, CT).
- 28 If you apply to the School for a bursary, we will use the information that you provide to assess your application (LI, CT). We may use a third-party organisation to assist us with our bursary application process. If you apply for a bursary, we may share information about you with a suitable third party so that they can assess your application (LI, CT).

Failure to supply information may result in a refusal of an award or credit.

Sharing personal data with others

- 29 In accordance with our legal obligations, we will share information with local authorities, the Independent Schools Inspectorate and the Department for Education, for example, where we have any safeguarding concerns or to comply with our legal obligations. These organisations may also share information with us for these purposes (LI, LO, PT).
- 30 On occasion, we may need to share your information with the police, or other law enforcement authorities but only in specific circumstances and where necessary to assist with investigations (LI, CT, LO, PT).
- 31 We may need to share information about you with the Health and Safety Executive where there is a health and safety issue at the School (LI, LO, PT).
- 32 We may also need to share information with our legal advisers for the purpose of obtaining legal advice (LI, LO, PT).
- 33 Occasionally we may use consultants, experts and other advisors to assist the School in fulfilling its obligations and operate effectively. For example, this could include accountants or PR specialists. We will share your information with them only when relevant to their work (LI, CT, PT).
- 34 If your child is not of a British or Irish nationality citizen we must verify their right to study in the UK. Sometimes the government will require us to provide information as part of our reporting obligations. In addition, we have a duty to share information about you with UK Visas and Immigration to comply with our duties as a Child Student and Student sponsor under the Points Based Immigration System (LI, CT, LO, PT).
- 35 If your child is sponsored by us under a Child Student or Student visa, we are required to

provide information about them to UK Visas and Immigration to fulfil our duties as their sponsor (LI, CT, LO, PT).

- 36 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, PT).
- 37 We may share some information with our insurance company and their representatives to make sure that we have the insurance cover that we need or in connection with an actual or possible claim (LI, PT).
- 38 If the School is handling a request for information, query, complaint or grievance (e.g. from another parent), we may need to share your information with other parties if it is relevant and appropriate to do so. For example, with the appropriate staff, pupil or parent involved and governors (LI, PT).
- 39 If you have unpaid fees we may share information about this with other schools or educational establishments to which you intend to send your child (LI).
- 40 If your child leaves to attend another school we may provide that school with information about you, for example, details relating to family circumstances or any safeguarding concerns (LI, LO, PT).
- 41 We may share information about you with other family members where necessary to care for your child, to comply with legal or regulatory obligations, or in connection with school fees (LI, PT).
- 42 We may need to share information in an emergency, for example, if you are injured whilst on school premises (LI, VI).
- 43 We will share information about you with other schools, for example, financial information or details of family circumstances (LI, PT).
- 44 If you have appointed an agent to act on your behalf, we may share information with them. (LI).
- 45 If you have appointed an educational guardian (and/or there are homestay arrangements) for your child, we may share information with them. For example, academic, medical and behavioural information regarding your child (LI).
- 46 We may send you information about the School before you accept a place for your child. For example, we may send you a copy of the school prospectus (LI).
- 47 If your child has an Education and Health Care Plan (EHCP), we will share information with and obtain information from the local authority about you (LO, PT).
- 48 If ever in the future, we are considering restructuring the charity which operates the School, we may share your information with the other parties involved and with the relevant professional advisors (LI).
- 49 Some of the records held by the School containing your personal data may be used by the School or third parties (such as government bodies) to assess the School's performance (LI, PT).
- 50 The School must make sure that our computer systems are working well and are secure. This may involve information about your child, for example, our anti-virus software might scan files containing information about your child (LI).

- 51 We may share your personal data with the School's governors if it is necessary for them to be aware of it or to fulfil their governance role, for example, concerns involving you or your child, or issues affecting the School's operation (LI, PT).

As you will see above, in some cases we rely on more than one lawful basis above for a particular use of your information. In addition, we may move from one of the lawful 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 data with the local authority in addition to the other lawful bases which are noted for safeguarding purposes.

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

- we engage IT consultants who may access information about you when checking the security of our IT network;
- we use software, apps and websites to support teaching and pastoral care, for example, we use an app that allows pupils to access homework which has been set by their teachers; and
- we use third party "cloud computing" services to store certain information, rather than the information being stored on hard drives located on the school site.

We may share your personal data with any of the representatives or advisors of any of the third parties mentioned in this privacy notice. Anyone that we share information with may give us information about you as well.

If you have any questions about any of the above, please speak to the Data Protection Lead.

More sensitive types of personal data

The School has extra obligations in relation to some types of more sensitive personal data (also known as special category data). This applies to the following categories of information: personal data 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 and information about criminal convictions or offences. When the School handles these types of information it will usually be doing so because:

- It is in the substantial public interest to do so, for example, to assist the School to comply with its safeguarding obligations.
- There will be times when the School needs to use your information because we are an employer (e.g. we employ teachers). 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.
- To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.
- It is necessary for the establishment, exercise or defence of legal claims. For example, this allows us to share information with our legal advisors and insurers.

Consent

We may ask for your consent to use your information in certain ways as an alternative to relying on any of the lawful bases above. For example, we may ask for your consent to send you information about our fundraising projects by email.

You can withdraw your consent at any time. However, any use of your personal data before you withdraw consent will remain lawful.

You can speak to the Data Protection Lead if you would like to withdraw any consent 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 an adequate level of protection for this personal data. Some countries are considered by the UK Government to have adequate rules, including all of the European Economic Area and some other countries, such as, New Zealand, Argentina and Switzerland.

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.

When working with our international partners, from time to time emails sent to the School might be forwarded to a regional email provider to ensure continued access. For example, with partners in China we might use Alibaba regional email services.

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 personal data for as long as we need to for the purposes set out in this privacy notice.

In some cases, we may keep your personal data for longer than usual, but only where we have a valid reason and are permitted to do so under data protection law. Please see the Information and Records Retention Policy for more information which is available on our website.

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:

- **Correction:** if information the School holds about you is incorrect you can ask us to correct it.
- **Access:** you have the right to ask what information we hold about you and be provided with a copy. This is 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 shared it with.
- **Deletion:** you can ask us to delete the information that we hold about you in certain circumstances, such as when it is no longer needed
- **Portability:** you can request the transfer of your information to you or to a third party in a computer readable format. 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 lawful bases for using your information" above); and (c) the information is being processed by us on computer.
- **Restriction:** you can request that we restrict how we use your personal data in certain circumstances.
- **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 lawful basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest. Please see the section "Our lawful bases

for using your information” above; and

- if we ever use your personal data for scientific or historical research purposes or statistical purposes.

The Data Protection Lead can give you more information about your data protection rights.

Further information and guidance

The Director of Operations is the person responsible at our school for managing how we look after personal data and deciding how it is shared. He can be contacted by email pad@cranleigh.org, by telephone on 01483 542138 or by post at Cranleigh School, Horseshoe Lane, Cranleigh, Surrey GU6 8QQ.

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.

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 contact the Data Protection Lead at dataprotectionlead@cranleigh.org if:

- you would like further information about any aspect of this privacy notice;
- you would like to exercise any of your rights listed above; or
- you would prefer that certain information is kept confidential. Please note that there will be occasions when your expectation of confidentiality is overridden by the School's other obligations, for example, if we need to share information for safeguarding reasons.

If you do not provide certain information when requested, we may not be able to fulfil our contractual obligations to you. We may also be prevented from complying with our legal obligations (such as to ensure the welfare of your child and their classmates). Failing to provide information may also adversely affect the education and care we are able to provide to your child.

If you are unhappy about the way in which we have handled your personal data, you have the right to complain to the ICO - the Information Commissioner's Office. However, we kindly ask that you contact us first so we have an opportunity to resolve any concerns before you escalate the matter.