



## **PRIVACY NOTICE**

### **WHO WE ARE**

**Caterham School is a data controller for the purposes of Data Protection Law; this means that the School**

**Caterham School is registered at Harestone Valley Road, Caterham, Surrey, CR3 6YA. Company number 5410420. Registered Charity number 1109508. This Privacy Notice includes Caterham Senior School and Prep School including the Parents Association which operate under separate Company numbers - Caterham School Trading Limited, Caterham School Enterprises Limited, Caterham School International Limited, Caterham School EdTech Limited and Caterham School Virtual.**

### **WHAT THIS PRIVACY NOTICE IS FOR**

**This policy is intended to provide information about how the School will use personal data about individuals including its staff; its current, past and prospective pupils, their parents, carers or guardians (referred to in this policy as parents) and all other members of the School community including pupils registered to Schools we work with as part of our outreach programme, contractors, visitors and neighbours. community.**

**This information is provided because Data Protection Law gives individuals the right to understand how their data is used. Staff, pupils, parents and members of our wider community are all encouraged to read this Privacy Notice and understand the School**

**This Privacy Notice applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form.**

**This Privacy Notice also applies in addition to the School's other relevant terms and conditions and policies, including:**

- any contract between the School and its staff or the parents of pupils;**
- the School's policy on taking, storing and using images of children;**
- the School**
- the School retention of records policy;**
- the School's SEND, safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and**
- the School's IT policies, including its Acceptable Use policy, eSafety policy, Social Media policy, Remote Working policy and Bring Your Own Device policy.**

**Anyone who works for, or acts on behalf of, the School (including staff, volunteers, Trustees and service providers) will be subject to suitable training and/or policies commensurate with their role.**

**RESPONSIBILITY FOR DATA PROTECTION**

The Director of Finance will deal with all your requests and enquiries concerning the School of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law. The Director of Finance can be reached by email - [lucie.funnell@caterhamschool.co.uk](mailto:lucie.funnell@caterhamschool.co.uk)

**WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA**

In order to carry out its ordinary duties to staff, pupils, parents and members of our wider community (for example, pupils taking part in our outreach programme), the School needs to process a wide range of personal data about individuals (including current, past and prospective staff, pupils and parents) as part of its daily operation. Where applicable references to pupils in this privacy notice also cover pupils registered to schools that we work with as part of our outreach programme.

Some of this activity the School will need to carry out in order to fulfil its legal rights, duties or obligations including those under a contract with its staff, or parents of its pupils.

Other uses of personal data will be made in accordance with the School, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

The School expects that the following uses will fall within that category of its **legitimate interests** :

- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents);
- For the purposes of assessment for financial support;
- For the purposes of processing or assisting with visa applications;
- To provide education services, including musical education, physical training or spiritual development, career services, trips and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs, including where such services are provided remotely (either temporarily or permanently);
- To carry out our outreach programme;
- Maintaining relationships with alumni and the School community, including direct marketing or fundraising activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective supporters and their background and relevant interests;
- For the purposes of management planning and forecasting research and statistical analysis,

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**To carry out or cooperate with any school or external complaints, disciplinary or investigation process; and  
Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.**

**In addition, the School will on occasion need to process **special category personal data** (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons will include:**

**To comply with public health requirements in respect of Covid-19 (or similar) testing; including**

images of pupils (and occasionally other individuals) engaging in School activities, and images captured by the School's CCTV system (in accordance with the School's policy on taking storing and using images of children).

## **HOW THE SCHOOL COLLECTS DATA**

Generally, the School receives personal data from the individual directly (including in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However in some cases personal data may be supplied by third parties (for example another school or other professionals or authorities working with that individual) or collected from publicly available resources.

## **WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH**

For the most part, personal data collected by the School will remain within the School, and will be basis).

Occasionally, the School will need to share personal information relating to its community with third parties, such as:

- appropriate contractors, such as visiting music teachers;
- professional advisers (for example lawyers, insurers, PR advisers and accountants);
- examination boards;
- Stage 3 complaints panels, which will include independent panel members;
- third parties and their advisers in the event of a possible or actual sale, merger or other restructuring of the school; government authorities (for example HMRC, Department for Education, police or the local authority); and
- appropriate regulatory bodies (for example the National College of Teaching and Leadership; Independent Schools Inspectorate, Charity Commission or the Information Commissioner).

In addition the School will share personal information from time to time with members of the Parents Association (PA) and Old Caterhamians Association (OCA). For example a guest list for an PA/OCA event may be 5( )TJ -36yof c hoon447.255 0 T1.98254(ld)12.0047( )-t.0t796( )38.985(195(II)-111.986(a)4.98



**Contact parents and/or alumni (including via the organisations above) by post and email in order to promote and raise funds for the School and, where appropriate, other worthy causes; Collect information from time to time from reputable public sources about parents' and former pupils' occupation and activities and relevant interests, in order to assist the School fundraising. The legal basis for collecting this information is your consent, where you have provided this, and otherwise our legitimate interest.**

**Should you wish to limit or object to any such use, or would like further information about them, please email [development@caterhamschool.co.uk](mailto:development@caterhamschool.co.uk). You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising.**

**identified in the Privacy Notice. Generally, if the school still considers the processing of the personal data to be reasonably necessary, it is entitled to continue. All such requests will be considered on their own merits.**

### **Pupil requests**

**Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the School, they have sufficient maturity to understand the request they are making (see section **Whose Rights** below). A pupil of any age may ask a parent or other representative to make a request on his/her behalf.**

**Indeed, while a person with parental responsibility will generally be expected to make a subject access**

**be aware that this is not necessarily the same as the School relying on strict consent (see section on Consent above).**

**Where consent is required, it may in some cases be necessary or appropriate given the nature of the processing in question, either alongside or in place of parental consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child at law or under their contract and all the circumstances.**

**In general, the School will assume that pupils' consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour and in the interests of the pupil's welfare. That is, unless in the School's opinion, there is a good reason to do otherwise.**

**However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the School may be under an obligation to maintain confidentiality unless, in the School's opinion, there is a good reason to do otherwise; for example where the School believes disclosure will be in the best interests of the pupil or other pupils, or if required by law.**

**Pupils are required to respect the personal data and privacy of others and to comply with the School's ICT Acceptable Use policy for pupils and the School Rules. Staff are under professional duties to do**



to or lodge a complaint with  
recommends that steps are taken to resolve the matter with the School before involving the regulator.

## **KEY TERMS**

**'Data Protection Law'**

UK General Data Protection Regulation (UK GDPR) which sits alongside the UK Data Protection Act 2018 (DPA 2018).

**'Data controller'** means organisations, including independent Schools, that determine how people's personal data is processed and for what purpose.

**'Data Subject'** means any living person whose data the Data Controller processes.

**Processing'** means any action in relation to that personal data, including filing and communication.

**Personal Data'** includes everything from which a Data Subject can be identified.

Some c **special category data'**, for example racial or ethnic origin, religious beliefs, health or biometric data. Extra protection is provided for these data.

## **SPECIAL CATEGORY PRIVACY NOTICES**

This Privacy Notice is accompanied by supplementary privacy notices for Pupils (under 12 years and over 12 years), Staff and Alumni.

Last Reviewed Date: December 2022