Edgeborough

Privacy Notice

WHO WE ARE

Edgeborough School, part of the Charterhouse family of schools (Registered Charity 312054), is located at 84 Frensham Road, Farnham, Surrey GU10 3AH.

Charterhouse School is the data controller for the purposes of the relevant legislation ("Data Protection Law"). Charterhouse has notified the Information Commissioner's Office (ICO) of its processing activities. The School's ICO number is Z6092852.

This Privacy Notice covers the following:

- Parents/Guardians
- Staff
- Alumni

WHAT THIS PRIVACY NOTICE IS FOR

This policy is intended to provide information about how the School will use (or "process") personal data about individuals including: its staff; current, past and prospective parents (referred to in this policy as "parents"), our alumni and supporters.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, parents, and alumni are all encouraged to read this Privacy Notice and understand the School's obligations to its entire community.

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's retention of records policy;
- the School's 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, Data Protection policy for Staff

Anyone who works for, or acts on behalf of, the School (including staff, volunteers, governors, and service providers) should also be aware of and comply with this Privacy Notice and the School's Data Protection policy for Staff, which also provides further information about how personal data about those individuals will be used.

RESPONSIBILITY FOR DATA PROTECTION

The School has appointed the Pre Schools' Bursar as its "Relevant Person" who will deal with all your requests and enquiries concerning the School's uses 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 Prep Schools' Bursar can be contacted by:

- emailing prepschoolsbursar@charterhouse.org.uk
- writing to the Prep Schools' Bursar at Edgeborough School, 84 Frensham Road, Frensham, Farnham, Surrey. GU10 3AH
- telephoning 01252 792495

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to staff, pupils, parents, governors, alumni and supporters the School needs to process a wide range of personal data about individuals (including current, past and prospective staff and parents) as part of its daily operation.

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's legitimate interests, 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 (or its community's) "**legitimate interests**":

- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents);
- Maintaining relationships with alumni and the School community, including providing services, sending publications, volunteering activities, direct marketing or fundraising activities;
- Collecting information from publicly available sources about parents' and alumni occupations and activities in order to maximise the School's fundraising potential;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);

- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's IT: acceptable use policy;
- To make use of photographic images of pupils in School publications, on the School website and (where appropriate) on the School's social media channels in accordance with the School's policy on taking, storing and using images of children;
- 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, 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 safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of School trips who need to be made aware of dietary or medical needs;
- In connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans;
- As part of any School or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements; or
- 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.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those staff who use our car parking facilities);
- bank details and other financial information, e.g. about parents who pay fees to the School;
- personnel files, including in connection with academics, employment or safeguarding;

- where appropriate, information about individuals' health and welfare, and contact details for their next of kin and
- correspondence with and concerning staff, pupils and parents past and present; alumni and supporters.

HOW THE SCHOOL COLLECTS DATA

Generally, the School receives personal data from the individual. 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 will be supplied by third parties (for example another School, or other professionals or authorities working with that individual); or collected from publicly available sources. For example, reference for staff wishing to work at Edgeborough, or information available on social media.

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

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

- professional advisers (e.g. lawyers, insurers, pensions and accountants);
- government authorities (e.g. HMRC, DfE, police or the local authority); and
- appropriate regulatory bodies e.g. the Independent Schools Inspectorate, the Independent Schools Boarding Association, the Charity Commission or the Information Commissioner.

For the most part, personal data collected by the School will remain within the School, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records (held and accessed by appropriate staff, or otherwise in accordance with express consent); and
- pastoral or safeguarding files.

However, a certain amount of any SEN pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

Staff and parents are reminded that the School is under duties imposed by law and statutory guidance (including Keeping children safe in education 2026) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please view the School's Safeguarding Policy.

Finally, in accordance with Data Protection Law, some of the School's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions. A (non-exhaustive) list of third party organisations that we share data with can be found in Annex A.

HOW LONG WE KEEP PERSONAL DATA

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary staff and pupil personnel files is up to 7 years following departure from the School. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. A limited and reasonable amount of information will be kept for archiving purposes, for example School photographs and magazines.

If you have any specific queries about how our retention policy is applied or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Bursar. However, please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such request. Even were you to request we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

The School has a Records Retention Policy which complies with the principles of UK GDPR in that it is:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary in relation to purpose
- Accurate and up to date
- Stored for no longer than necessary
- Processed in a manner that ensures appropriate security of personal data

KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The School will use the contact details of parents, alumni and other members of the School community to keep them updated about the activities of the School, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the School will also:

- Share personal data about parents and/or alumni, as appropriate, with the Edgeborough Parents Association (EPA) to help establish and maintain relationships with the School community;
- Contact parents and/or alumni by post and email in order to promote and raise funds for the School.

Should you wish to limit or object to any such use, or would like further information about them, please contact the Bursar in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the School is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

YOUR RIGHTS

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the School, and in some cases ask for it to be erased or amended or have it transferred to others, or for the School to stop processing it – but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the Bursar.

The School will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits, which is one month in the case of requests for access to information (but may require one or two months further to complete complex requests). The School will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the School may ask you to reconsider, or require a proportionate fee, but only where Data Protection Law allows it.

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – please see further below), or information which is subject to legal privilege (for example legal advice given to or sought by the School, or documents prepared in connection with a legal action).

The School is also not required to disclose any pupil examination scripts (or other information consisting solely of pupil test answers), provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the School itself for the purposes of the education, training or employment of any individual.

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

CONSENT

Where the School is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Examples where we do rely on consent are certain types of uses of images, direct email fundraising activity and overseas trips. Please be aware however that the School may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because a purchase of goods, services or membership of an organisation such as an alumni or parents' association has been requested).

WHOSE RIGHTS?

The rights under Data Protection Law belong to the individual to whom the data relates. However, the School will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils – for example, under the parent contract, or via a form. Parents and pupils should 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, and the pupil's age and understanding – to seek the pupil's consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights 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 IT acceptable use policy and the School rules. Staff are under professional duties to do the same.

DATA ACCURACY AND SECURITY

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the Bursar of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the School may need to process your data, of who you may contact if you disagree.

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to School systems. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

THIS POLICY

The School will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

QUERIES AND COMPLAINTS

Any comments, queries or complaints about this policy or how the School handles personal data should be directed to the Prep Schools' Bursar using the following contact details:

- emailing prepschoolsbursar@charterhouse.org.uk
- writing to the Prep Schools' Bursar at Edgeborough School, 84 Frensham Road, Frensham, Farnham, Surrey. GU10 3AH
- telephoning 01252 792495

If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the School complaints procedure and should also notify the relevant person. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.

Annex A: EXAMPLES OF THIRD PARTY ORGANISATIONS THAT THE SCHOOL SHARES DATA WITH

Grouping/Function	Third Party	Data
GENERAL		
Database	Microsoft	*Email/Databases*
	SAGE	*General Ledge/Payments*
	ISAMS	*Pupil database*
	Sign In App	*Visitor Registration*
	iTRENT	*Staff database*
	SOCs	*Intranet*
	SchoolPost	*Communications*
	My School Portal	*Communications/Database*
STAFF		
	Atlantic Data	*DBS*
Recruitment	Teacher's Pension Online	*Employee registrations*
	VWV SCR+	*Database*
Training	AGBIS	Training
	TES Develop	Training
Legal Advice	Solicitors contracted to school	*Variable*
Health / Welfare	BUPA	*Medical insurance*
	Health Assured	*Medical EAP*
Pensions	Aviva	*Support staff and teaching staff pension*
	Teachers' Pension Scheme	*Teaching staff pension*
H&S	Riddor	*Accident reporting*
Finance	Crowe	*Audit*
	BACS	*Payment*