CHARTERHOUSE

PRIVACY NOTICE

Author: PJG| **Lead:** PJG | **Last reviewed:** May 2026 | **Next Review**: May 2027

WHO WE ARE

1. Charterhouse is an independent school that educates c.1,000 boys and girls in a boarding environment. To assist in delivering this education the School also maintains close links with the local community and the wider Charterhouse community. In order to undertake these activities, the School handles relevant data and carries out a number of processes with that data. This makes the School a data controller for the purposes of the relevant legislation ("Data Protection Law").

2. The School has notified the Information Commissioner's Office (ICO) of its processing activities. The School's ICO registration number is Z6092852 and its registered address is Charterhouse School, Charterhouse, Godalming, Surrey GU7 2DX. The School is a registered charity and its charity number is 312054.

3. This Privacy Notice covers the following:
    a. Pupils
    b. Parents/Guardians
    c. Staff
    d. Governors
    e. Alumni.

WHAT THIS PRIVACY NOTICE IS FOR

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

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

6. 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.

7. This Privacy Notice also applies in addition to the School's other relevant terms and conditions and policies, including:
    a. any contract between the School and its staff or the parents of pupils
    b. the School's policy on taking, storing and using images of children
    c. the School's CCTV and/or biometrics policy
    d. the School's retention of records policy
    e. the School's safeguarding, pastoral, or health and safety policies, including how concerns or incidents are recorded and
    f. the School's IT policies, including its Acceptable Use policy, E-Safety and Technical Security policy, Data Protection policy for Staff.

8. 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 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

9. The School has appointed the Chief Operating Officer (COO) as the Privacy and Compliance Officer 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 notice and Data Protection Law.

10. The Chief Operating Officer can be contacted by:
    - Emailing: coo@charterhouse.org.uk
    - Telephoning: 01483 291500
    - Writing to: Chief Operating Officer, Charterhouse, Godalming, Surrey, GU7 2DX

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

11. 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, pupils or parents) as part of its daily operation.

12. 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.

13. 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.

14. The School expects that the following uses will fall within that category of its (or its community's) "**legitimate interests**":
    a. For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents) and complying with anti-money laundering regulations
    b. To provide education services, including the delivery of curriculum content, assessment, academic development and attainment, feedback, and progress tracking, musical education, physical training or spiritual development, career services, and extracurricular activities to pupils, and monitoring pupils' progress and educational needs.
    c. Maintaining relationships with alumni and the school community, including providing services, sending publications, volunteering activities, direct marketing or fundraising activities
    d. For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests
    e. Collecting information from publicly available sources about parents' and alumni occupations and activities in order to maximise the School's fundraising potential
    f. 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 and taxation records)
    g. To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate
    h. 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
    i. To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the School

j. To support pupils with special educational needs or disabilities, including through the use of specialist assessment, screening, and reporting platforms, and to share relevant information with staff and external professionals where necessary and lawful.
k. To safeguard pupils' welfare, provide appropriate pastoral care, and comply with statutory duties, including through automated data sharing with local authorities and the use of monitoring systems designed to identify safeguarding concerns.
l. To operate, maintain and secure the School's IT systems and digital services, including service management, cybersecurity monitoring, threat detection, incident response and system logging.
m. To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's IT: acceptable use policy
n. 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
o. For security purposes, including CCTV in accordance with the School's CCTV policy
p. To carry out or cooperate with any school or external complaints, disciplinary or investigation process and
q. Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.

15. 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:
    a. 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 and social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs
    b. To provide educational services in the context of any special educational needs of a pupil
    c. To provide spiritual education in the context of any religious beliefs
    d. In connection with employment of its staff, for example DBS checks, welfare, union, membership or pension plans
    e. To run any of its systems that operate on biometric data, such as for security and other forms of pupil identification (door access, registration etc.)
    f. 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
    g. 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

16. This will include by way of example:
    a. names, addresses, telephone numbers, e-mail addresses and other contact details;
    b. employment details and life achievements and details of interactions with the School and related groups (about those who use our Foundation services);
    c. car details (about those who use our car parking facilities);
    d. biometric information, which will be collected and used by the School in accordance with the School's biometrics policy;
    e. bank details and other financial information, e.g. about parents who pay fees to the School;

f. past, present and prospective pupils' academic, assessment, behavioural, disciplinary, admissions, attendance, and progress records (including information relating to any special educational needs or disabilities), examination scripts and marks;
g. personnel files, including in connection with academics, employment or safeguarding;
h. where appropriate, information about individuals' health and welfare, and contact details for their next of kin, education guardians and nominated guardians;
i. references given or received by the School about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
j. correspondence with and concerning staff, pupils, parents past and present, alumni and supporters; and
k. 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

17. 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).

18. 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 resources. For example, references for staff wishing to work at the Charterhouse, or information available on social media.

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

19. Occasionally, the School will need to share personal information relating to its community with third parties, such as:
    a. professional advisers (e.g. lawyers, insurers, pensions, and accountants)
    b. government authorities (e.g. HMRC, DfE, DHSC, police or the local authority)
    c. appropriate regulatory bodies (e.g. Teaching Regulation Agency, the Independent Schools Inspectorate, the Charity Commission or the Information Commissioner) and
    d. affiliated organisations and individuals that support the School (e.g. OC Clubs and Carthusian Society).

20. 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:

    a. medical records (held and accessed only by the School doctor and appropriate medical staff under his/her supervision, or otherwise in accordance with express consent); and
    b. pastoral or safeguarding files.

21. 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.

22. Staff, pupils and parents are reminded that the School is under duties imposed by law and statutory guidance (including **Keeping Children Safe in Education**) 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 Local Authority Designated Officer (LADO) or police. For further information about this, please view the School's Safeguarding Policy.

23. In accordance with Data Protection Law, some of the School's processing activity is carried out on its behalf by third parties, including providers of IT systems, cloud services, educational platforms, safeguarding tools, payment services, security monitoring and specialist assessment software. This processing is always subject to contractual assurances that personal data will be kept securely, used only in accordance with the School's instructions, and protected by appropriate technical and organisational measures.

24. Some of these third-party providers may process limited personal data outside the UK. Where this occurs, the School ensures that appropriate safeguards are in place in accordance with Data Protection Law, such as contractual protections and approved international transfer mechanisms.

25. The School maintains a full and current record of third-party organisations that process personal data on its behalf. This information is available upon request by contacting the Chief Operating Officer. Individuals may be asked to confirm their relationship with the School (for example, staff, pupil, parent, alumni or governor) so that the request can be handled appropriately and in accordance with Data Protection Law.

HOW LONG WE KEEP PERSONAL DATA

26. The School will retain personal data securely and only in line with how long it is necessary to keep it 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. This particularly applies given the recent Independent Inquiry into Child Sexual Abuse (IICSA) investigations and the requirement to keep any material that may be relevant to future inquiries. A limited and reasonable amount of information will be kept for archiving purposes, for example school photographs and magazines.

27. 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 Chief Operating Officer. However, please bear in mind that the School may have lawful and necessary reasons to hold on to some personal data even following such a request. Even were you to request that 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").

28. The School has a Records Retention Policy which complies with the principles of UK GDPR in that it is:
    a. Processed lawfully, fairly and in a transparent manner
    b. Collected for specified, explicit and legitimate purposes
    c. Adequate, relevant and limited to what is necessary in relation to purpose
    d. Accurate and up to date
    e. Stored for no longer than necessary
    f. Processed in a manner that ensures appropriate security of personal data.

KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

29. The School and/or any relevant other organisation 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:

a. Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the School community, such as the OC Club, the House Associations, and the Carthusian Society.
b. Contact parents and/or alumni (including via the organisations above) by post, phone, and email in order to promote and raise funds for the School and, where appropriate, other worthy causes.

30. Should you wish to limit or object to any such use, or would like further information about them, please contact the Chief Operating Officer 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).

31. The School will ask for your consent to use data for the following:
    a. To share medical data with medical professionals or counsellors outside the School
    b. To use single person images, particularly if named, for marketing purposes
    c. To use electronic messaging for fundraising purposes.

YOUR RIGHTS

32. 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.

33. 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, is asked to put their request in writing to the Chief Operating Officer.

34. The School will endeavour to respond to any such 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 made during term-time. 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.

35. 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 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.

36. 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.

PUPIL REQUESTS

37. 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 subject access request on his/her behalf. Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, the law still considers the information in question to be the child's: for older pupils, the parent making the request may need to evidence their child's authority for the specific request.

38. Pupils at a senior school are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home.

39. It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about pupils without their consent. The School may consider there are lawful grounds for sharing with or without reference to that pupil.

40. Parents will in general receive news, educational and pastoral updates about their children, in accordance with the Parent Contract. Where parents are separated, the School will in most cases aim to provide the same information to each person with parental responsibility, but may need to factor in all the circumstances including the express wishes of the child.

41. All information requests from, or on behalf of, pupils – whether made under subject access or simply as an incidental request – will therefore be considered on a case by case basis.

CONSENT

42. Where the School is relying on consent as a lawful basis to process personal data, any person may withdraw that consent at any time (subject to age and capacity considerations). Examples where consent may be relied upon include certain uses of images, direct email fundraising activity, optional enrichment activities, non-essential digital services, or biometrics.

43. In many cases, however, the School has another lawful reason to process the personal data in question, such as where it is necessary for educational provision, safeguarding, security, contractual performance or compliance with legal obligations, and therefore consent, and any associated right to opt-out, will not apply.

44. 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

45. 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).

46. 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.

47. 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.

48. 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.

49. 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 covered under the relevant staff policy.

DATA ACCURACY AND SECURITY

50. 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. Pupils and parents must please notify the Data Compliance Manager of any significant changes to important information, such as contact details, held about them. Staff are expected to do the same with the HR department.

51. 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.

52. 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 notice and other relevant policies and their duties under Data Protection Law and receive relevant training.

53. The School makes use of automated and AI assisted tools for cybersecurity, email security, transcription and system monitoring, which operate with appropriate human oversight and are not used to make decisions producing legal or similarly significant effects about individuals without such oversight.

THIS NOTICE

54. 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

55. Any comments, queries, or complaints about this notice or about how the School handles personal data should be directed to the Chief Operating Officer using the following contact details:
    - Emailing: coo@charterhouse.org.uk
    - Telephoning: 01483 291500
    - Writing to: Chief Operating Officer, Charterhouse, Godalming, Surrey, GU7 2DX

56. If an individual believes that the School has not complied with this notice or acted otherwise than in accordance with Data Protection Law, they should utilise the School Complaints Review Procedure and should also notify the Clerk to the Governing Body. The School can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO) (www.ico.org.uk), although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.