Charitable Objects of St. Catherine's School- *The Objects for which the Company is established are to promote and provide for the advancement of education by providing, conducting, governing, carrying on and maintaining in the United Kingdom, or elsewhere, a boarding or day School or Schools for girls in which the teaching shall be in accordance with the principles of the Church of England.*

ST CATHERINE'S SCHOOL BRAMLEY

PRIVACY NOTICE – PUPILS AND PARENTS

'Believe… Achieve… Succeed'

Privacy Notice Holder	Caroline Mead
Date Approved	October 2026
Approval	Governance and Risk Committee
Date for next review	October 2027

1. Who we are

We are St Catherine's School, Bramley, a company registered in England and Wales (the "School"). Our company registration number is 03596520, our charity registration number is 1070858 and our registered office is at St Catherine's School, Station Road, Bramley, Guildford, Surrey, GU5 0DF.

The School is the "controller" of the personal data described in this notice. That means we are responsible for deciding how it is used and for looking after it properly.

This notice covers the whole School: the Pre-Prep School, Prep School, Senior School and the Sixth Form.

2. What this notice is for

This privacy notice replaces the pupil and parent content of the Confidentiality and Privacy Policy which was withdrawn in 2025. This notice explains how the School collects, uses, shares and looks after personal data about current, past and prospective pupils, and about their parents, carers and guardians (referred to in this notice as "parents").

The School are required to provide it to you by Articles 13 and 14 of the UK General Data Protection Regulation (GDPR) so that you know what we do and what your rights are.

A separate, shorter explanation written for pupils themselves appears at section 15.

Prospective pupils and their parents are covered by a separate Privacy Notice for Applicants during the admissions process. This notice only takes over once a pupil joins the School.

3. Who is responsible for data protection at the School

The Data Protection Officer is responsible for overseeing how the School looks after personal data, and is the person to contact with any question, request or concern. These contact details are listed in section 17 of this notice.

4. Why the School needs to process personal data

The School needs to use personal data in order to educate pupils, to care for them, to keep them safe, and to run itself as a school and as a charity. In particular:

- to provide education, teaching, assessment and reporting;
- to safeguard and promote the welfare of pupils, and to provide pastoral and, where necessary, medical care;
- to administer admissions, attendance, fees, bursaries and scholarships;
- to enter pupils for public examinations and manage internal assessment;
- to make reasonable adjustments and provide support for special educational needs and disabilities;
- to organise trips, visits, co-curricular activities, catering and transport;
- to communicate with parents about their daughter's progress, activities and welfare, and about School matters generally;
- to maintain the security of the School site and its IT systems;
- to promote the School, and to maintain relationships with former pupils and the wider School community; and
- to comply with the School's legal, regulatory and inspection obligations.

Our lawful basis

The law requires us to have a lawful basis for each use of personal data. Ours are:

Lawful basis	When we rely on it
Contract	Where the processing is necessary to perform the Parent Contract — for example providing education, charging fees and reporting on progress.
Legal obligation	Where the law requires it, e.g. attendance registers, safeguarding referrals, examination administration, health and safety, and immigration compliance.
Legitimate interests	Where the processing is necessary for the School's legitimate interests as a school and a charity and does not unfairly affect you, e.g. site security, alumnae relations, and the general administration of the School.
Recognised legitimate interests	Where the processing is necessary for a purpose pre-approved in law, which includes safeguarding children and individuals at risk.
Vital interests	In an emergency, where the processing is necessary to protect someone's life.

Lawful basis	When we rely on it
Consent	Where we ask for your permission and you give it, most importantly for photographs and images intended for publication outside the School - where we rely on consent which you may withdraw at any time.

5. The personal data we process

The personal data the School hold about pupils and parents may include, but is not limited to:

- names, addresses, contact details, dates of birth, nationality and immigration status information;
- academic records, reports, marks, examination entries and results, and examination scripts;
- admissions records and confidential references;
- attendance records and correspondence about absence;
- behaviour, disciplinary and exclusion records;
- pastoral, welfare and safeguarding records;
- medical records, dietary requirements and information about special educational needs and disabilities;
- photographs, video and audio recordings, and CCTV footage;
- records relating to trips, activities, catering, transport and boarding;
- fees, bank details, payment history and any bursary or scholarship application;
- donation history and information about a family's involvement with the School community; and
- IT account records, and information held in emails and other electronic communications.

Personal data includes not only facts but also opinions and professional judgements, e.g. the comments in a school report and records of the School's intentions towards an individual.

More sensitive information
Some of the information above is "special category" personal data, which the law protects more strictly. For pupils and parents this principally means information about health and may also include information revealing racial or ethnic origin, religious or philosophical beliefs, genetic or biometric data or sexual orientation. The School may also process information relating to criminal offences and proceedings.

The School process this information only where the law allows, which for the School principally means: to safeguard pupils and individuals at risk; to provide health and medical care; to make reasonable adjustments for disability or special educational needs; for equality of opportunity monitoring; to provide counselling; for insurance; for legal claims; and to comply with legal and regulatory duties.

The specific legal conditions the School rely on, and the safeguards we apply, are set out in the School's Appropriate Policy, which is available on request.

6. How we collect personal data

Directly from parents and pupils on admission forms, consent forms, medical forms, in correspondence and in meetings.

- From the pupil during her education, e.g. her work, assessments and her use of School systems.
- From staff, who record information about a pupil's progress, behaviour and welfare.

- From a previous school, including confidential references and, where a pupil transfers, her child protection file.
- From third parties such as examination boards, educational psychologists, medical professionals, local authorities and, where relevant, the police or children's services.
- Automatically, through the School's IT systems, CCTV and site access controls.

7. Who we share personal data with

Within the School, personal data is available to staff who need it for their role, and no more widely.

Outside the School, we may share personal data:

- with other educational institutions a pupil may attend, including by providing a confidential reference and, as Keeping Children Safe in Education requires, the pupil's child protection file when she leaves;
- with examination boards, to enter pupils and to publish results and achievements;
- with medical professionals, insurers, caterers and trip organisers, where it is in a pupil's interests — for example to disclose a medical condition or dietary need;
- with the members of a complaints panel convened under the School's Complaints Policy, which may include an independent panel member;
- with providers of educational tours, trips and other educational services, including visiting teachers and appropriate contractors;
- with service providers who process personal data on the School's behalf, such as our management information system, medical records, finance, communications and IT suppliers;
- with professional advisers approved by the School, including in the event of a possible or actual sale, merger or other restructuring;
- with the relevant authorities in order to report incidents or provide safeguarding information — for example the Local Authority Designated Officer (LADO), children's services, Child and Adolescent Mental Health Services (CAMHS) or the police — in accordance with our duties under law and statutory guidance;
- with government departments and regulators, including HMRC, the Department for Education, Children and Family Court Advisory and Support Service (CAFCASS), the Home Office, the relevant public health or NHS body, the local authority, the Teaching Regulation Agency, the Independent Schools Inspectorate and the Charity Commission; and
- where the School are required to do so by law, or in connection with legal proceedings.

The School may also give information about outstanding fees or payment history to another educational institution which it is proposed a pupil may attend.

Where the School receive a request for personal data from a third party, we take reasonable steps to verify that party's identity before disclosing anything.

We do not sell personal data, and the School does not share it with third parties for their own commercial or advertising purposes.

8. Photographs, filming and images

Photographs and moving images of an identifiable person are personal data, so we treat them with the same care as any other information about your daughter.

What we use images for, and on what basis

Use	Basis
Recording learning and achievement within School, e.g. displays, EYFS learning journals, records of achievement, assemblies, internal newsletters and password-protected areas of the School website and parent portal	Legitimate interests, and contract
Publication outside the School, e.g. public areas of the School website, social media, the prospectus, advertising, press and other marketing	Consent
Records of School events kept for archive purposes	Legitimate interests
Safeguarding, disciplinary or investigatory purposes, including CCTV	Legal obligation, and substantial public interest

Permission
The School ask parents for photography permissions when a pupil joins the School, and those permissions are recorded on the School's management information system so that staff can check them before an image is used. Permissions are collected by the Admissions Team and maintained by the SIMS Manager, and a central summary is made available to staff and specifically catering staff for pupils with known allergies and dietary requirements.

You do not have to give a single, all-or-nothing answer. Permissions may be given for some uses and withheld for others, and we record the detail of what you have asked for. In practice parents ask us for a wide variety of arrangements, and we accommodate them, e.g. allowing group photographs but not individual ones, permitting internal use but not the public website, excluding social media specifically, or asking to be consulted before each use.

Where a pupil is old enough to express their own view, the School record's this view as well as her parents'.

Where a pupil does not wish her image to be used, we will respect that.

Where a pupil's recorded wishes and her parents' recorded wishes differ, the School will follow whichever is more restrictive. From the Sixth Form, the School will normally give precedence to the pupil's own view. Any case that is unclear is decided by the Data Protection Officer, who will discuss it with the family.

Changing your mind
You may change or withdraw a photography permission at any time, and it is as easy to withdraw as it was to give — simply contact the Data Protection officer using the details at section 17 of this policy. We will update the record, stop using the image for the purposes concerned, and remove it from channels the School controls within a reasonable period.

We cannot promise to recover material that has already left our control, e.g. printed publications already distributed, archived press coverage, or copies that others have already made or shared. The School will always tell you this when we ask for your permission, so that the decision you make is an informed one.

What we ask of staff, pupils and parents

- Staff take photographs and video of pupils on School devices only, never on personal devices, and store them within School systems.
- No photograph on the public area of the School website carries a pupil's full name, and we consult those involved before using a name alongside an image published externally.
- In the EYFS setting, parents, carers and visitors may not use personal phones, cameras or other devices capable of taking and sharing images without the prior approval of the Head of Pre-Prep or the Prep School Head.
- Parents and guests may take photographs at School events for their own personal and family use. The School asks that images including other people's children are not posted on social media or forwarded beyond the immediate family, and that communications from the School containing photographs or information about other pupils are not passed on.

Rules about conduct online, and about pupils' own use of photography and social media, are in the School's Information and Communications Technology (ICT) Policy.

9. CCTV

The School operates a CCTV system across the Senior School, the Preparatory School, the boarding houses, and the grounds, entrances, car parks and perimeter. CCTV is not installed in private areas such as toilets, changing rooms or bedrooms.

CCTV is used to safeguard pupils, staff and visitors, to prevent and detect crime, to protect School property, and for health and safety monitoring across the site. We rely on our legitimate interests in the safety and security of the site, and on our legal obligations in respect of safeguarding. Where footage is used in a safeguarding matter it may constitute special category or criminal offence data, and we process it only where a condition in the Data Protection Act 2018 permits.

Clear signage is displayed across the site where CCTV is in operation.

Footage is retained for 30 days. It is kept longer only where it is required for a safeguarding investigation, a disciplinary process or a police investigation. Because footage is routinely overwritten after 30 days, a request for footage must be made promptly; we may be unable to provide footage that has already been overwritten.

Access to footage is restricted to authorised personnel, must be for a legitimate purpose, and every access is recorded in the School's CCTV Access Log. Misuse is a disciplinary matter. The system is maintained by the School on its own equipment. Footage may be shared with the police or other relevant authorities where there is a lawful basis to do so; it is not shared informally.

You may object to our use of CCTV where you rely on grounds relating to your particular situation. Please contact the Data Protection Officer using the details at section 17.

10. Keeping in touch and supporting the School

The School maintains relationships with parents, former pupils and the wider School community, and communicates about the St Catherine's Association, the Parent Teacher Association, events, development

and fundraising. We rely on our legitimate interests as a school and a charity to do so, and every electronic communication of this kind includes a way to opt out.

Where the School are asked to pass on information about activities run by external organisations, such as holiday clubs, the School will only send that by email or other electronic means to those who have specifically opted in to receive information about third-party opportunities. That is a separate choice from general school communications, and you may withdraw it at any time.

You may ask us at any time to limit or stop using your personal data for these purposes.

11. How long we keep personal data

The School keeps personal data securely and only for as long as there is a lawful and legitimate reason to do so. How long that is depends on the type of record: some periods are set by law, and safeguarding and incident records are kept for considerably longer than ordinary records.

The periods that apply are set out in the School's Information and Records Retention Policy and Retention Schedule.

A limited and reasonable amount of information is kept for archive purposes. If you ask us not to contact you again, we will need to keep a record of that request in order to give effect to it - this is called a suppression record. The School will also often have lawful and necessary reasons to retain some personal data even after a request to erase it.

Pupil records are retained until the pupil's date of birth plus 25 years, in line with the School's Retention Schedule. Some records, such as attendance registers, have shorter statutory periods, and safeguarding records may be held for longer. Information regarding the Retention Schedule is available on request from the Data Protection Officer.

12. Transfers outside the United Kingdom

Some of the service providers the School use are based outside the United Kingdom. Where personal data is transferred outside the UK the School makes sure an appropriate safeguard is in place, e.g. either the receiving country has been formally recognised by the UK as providing adequate protection, or the transfer is governed by the UK's standard contractual protections. We apply extra scrutiny where a provider handles sensitive information or holds data about a large number of people.

13. Your rights

You have the right:

- to obtain access to, and copies of, the personal data the School holds about you;
- to have inaccurate personal data corrected;
- to have your personal data erased, in certain circumstances;
- to ask us to restrict how we use your personal data, in certain circumstances;
- to receive personal data you have given us in a portable format, in certain circumstances, including so that you can pass it to another organisation;

- to object to particular things we do with your personal data, on grounds relating to your situation, where you feel it has a disproportionate effect on you;
- to object to direct marketing;
- to withdraw your consent, where the School are relying on consent, without affecting anything done before you withdrew it;
- to contest or ask for human involvement in a decision made about you purely by automated means, where that decision has a significant effect; and
- to complain to the School and to the Information Commissioner's Office (ICO).

These rights are not absolute and the School may be entitled to refuse a request where an exception applies. The School will respond as soon as it reasonably can and in any event within one month. If a request is complex, or if you make several, we may need up to two further months, and the School will tell you within the first month if so. If we need you to clarify what you are looking for, the time limit may pause until you tell us. The School are required to make a reasonable and proportionate search, rather than an exhaustive one.

You do not need to use any particular form of words, or to mention data protection, to make a request. The School's Subject Access Request Procedure explains how we handle them.

14. Whose rights pupils and parents

The rights under data protection law are those of the person the data is about. The School will however in most cases rely on parental authority or notice for the necessary ways it processes personal data relating to pupils, e.g. 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.

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, 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, the parents' rights at law or under their contract, and all the circumstances.

The School makes it clear to pupils that they should expect the School to share information about them with parents in the ordinary course of school matters (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, from U3 (Year 7) and above, it will usually be for the pupil to authorise a specific subject access request made by a parent on her behalf. The School will consider other individual requests for information relating to a pupil made by a parent (and may have lawful grounds to provide it), but the School is legally obliged to consider the child's data protection rights in doing so, in particular if the information is sensitive or special category personal data.

Where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds her agreement to her personal data being disclosed to her parent or parents, the School will maintain confidentiality unless it has reasonable grounds to believe that the pupil does not fully understand the

consequences of withholding their consent, or where the School believes disclosure will be in the best interests of the pupil or other pupils, or if it is under a legal obligation to disclose.

The School will only grant the pupil direct access to her own personal data if, in the School's reasonable belief, the pupil understands the nature of the request she has made, and the disclosure is made with due care for any harm or distress it may cause her.

15. A note for pupils

Your information, and what we do with it

The School keeps information about you. Some of it is simple, like your name, your address and your date of birth. Some of it is about your school life, e.g. your marks, your reports, when you have been in school, clubs and trips you have been on. Some of it is more private, like whether you have any medical needs, or notes made if you have talked to a teacher about something that was worrying you.

We keep this information because we need it to teach you, to look after you and to keep you safe. We are not allowed to use it for anything else without a good reason.

Only the staff who need to see your information can see it. Sometimes we have to share it outside school, e.g. with an exam board when you take an exam, with a doctor if you are unwell, or with people whose job it is to keep children safe if we are worried about you. We would normally tell you if we were going to share something important about you, unless there was a good reason not to.

You have rights over your own information. You can ask us what we hold about you and ask for a copy. You can ask us to correct it if it is wrong. You can ask us to delete it, though we cannot always agree. And you can tell us if you are unhappy about how we have looked after it.

Photographs are your information too. If you do not want your photograph used, e.g. on the website, on social media, or in a brochure, you can tell us, and we will write it down and respect it. You can change your mind later.

If you want to talk to someone about any of this, you can speak to your tutor or form teacher, or email GDPR@stcatherines.info. Nobody will mind you asking, and you will not get into trouble for asking.

16. Accuracy and security

The School will endeavour to ensure that the personal data we hold is accurate. Please tell us if any information we hold about you changes, or if you think it is wrong. You have the right to ask us to correct or erase inaccurate information, although the School may reasonably determine whether or not the information is in fact accurate.

The School takes appropriate technical and organisational measures to keep personal data secure, and to protect it against unauthorised access, loss or damage. Staff have access only to the personal data they need for their role, and only where they are suitably trained. Our measures are set out in the School's Information Security Policy and Information and Communications Technology (ICT) Policy.

17. Queries and complaints

Please contact the Data Protection Officer with any question about this notice, any request to exercise your rights, or any concern about how the School has handled personal data:

By email	GDPR@stcatherines.info
By post	Caroline Mead, Data Protection Officer, St Catherine's School, Station Road, Bramley, Guildford, Surrey, GU5 0DF
By telephone	01483 893363

The School will acknowledge a complaint about the handling of personal data within 30 days of receiving it, investigate it without undue delay, keep you updated, and give you a clear outcome. Where appropriate we will handle it alongside the School's Complaints Policy.

If you are not satisfied with our response, or if we fail to respond in time, you may complain to the Information Commissioner's Office (ICO) at ico.org.uk or on 0303 123 1113. We would ask you to raise the matter with us first, and the Information Commissioner's Office recommends the same.

18. Changes to this notice

The School will review this notice annually or sooner if there are statutory changes. The current version is always available on the School's website, and from the School Office on request. Where we make a significant change we will draw it to the attention of parents.