



Reading School Privacy Notice

July 2024

Next Review: July 2026



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1. INTRODUCTION

This Privacy Notice applies to all personal data processed by Reading School and its subsidiary companies, organisations and clubs, collectively referred to as the ("**School**", "**we**" and "**our**"). This policy applies to all personal data, regardless of whether it is in paper or electronic format.

This notice complies with the [UK General Data Protection Regulation \(UK GDPR\)](#) and the [Data Protection Act 2018](#), ensuring that personal data is processed lawfully, fairly, and transparently.

We are committed to safeguarding the privacy of information provided to us and information about visitors to our School's website and any other associated websites under our control (together "**Websites**"). The School is the data controller of any personal information provided to us set out in paragraph 2 below.

This policy provides information about how the School may collect information and uses (or "**processes**") personal data about individuals ("**you**" and "**your**") including:

- Current, past and prospective pupils
- Their parents, carers, or guardians (referred to in this policy as "**parents**")
- Staff, including employees, contractors, casual workers, and volunteers
- Donors, alumni (sometimes referred to as ORs), friends, sponsors and supporters
- Visitors and other individuals connected to the School

This applies in addition to any contract between you and the School and any other information or policies the School may provide about a particular use of personal data. The School will update this from time to time. We will highlight any changes that substantially affect your rights on our website or directly to you as far as practicable. Your use of our online services or your provision of information to us constitutes your acknowledgement of the terms of this Privacy Notice. Please do not send us any of your information if you do not want it to be used in the ways described in this Privacy Notice.

If you have any questions about your personal data or its use, please contact:

secretary@reading-school.co.uk.



2. **WHAT DATA THE SCHOOL PROCESSES**

As part of its operations, the School may process a wide range of personal data about individuals, including by way of example:

- names, addresses, telephone numbers, email addresses, and other contact details;
- car details (about those who use our car parking facilities);
- bank details and other financial information;
- current, past, and prospective pupils' academic, disciplinary, admissions, and attendance records, and examination scripts and marks;
- personnel files, including in connection with academics, employment, or safeguarding;
- nationality and other immigration status information (e.g., right to work/study) including copies of passport information and any other information required for school trips or proof of residency;
- where appropriate, information about individuals' health, special needs, and contact details for their next of kin;
- references given or received by the School, and information provided by previous educational establishments and/or other professionals or organisations working with pupils or previous employers;
- correspondence with and concerning staff, pupils, and parents past and present;
- images of individuals engaging in school events and activities, and images captured by the School's CCTV system;
- visitor logs, login credentials, digital access, and other logs; and
- biometric information used for accessing cashless payment systems and boarding facilities.

3. **HOW THE SCHOOL COLLECTS PERSONAL DATA**

3.1 **General**

Generally, the School receives personal data directly from the individual (including, in the case of pupils, from their parents). This may be via a form or in the ordinary course of interaction or communication (such as email, written assessments via our websites such as signing up to events or registering your own details). 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, the Disclosure and Barring Service, or third-party service providers who credit and identity check parents, alumni and donors and their source of funds). Data may also be collected from publicly available resources, for example, as part of donor wealth screening or through social media screening as part of job application processes or disciplinary matters.

We may collect current and historical personal information including your name (including name prefix or title), contact details (such as your postal address, email address, and phone number(s)), nationality, identification, gender, organisation, business interests, employment, positions held special categories of data (such as race and ethnicity, trade union membership, information about health or information, political opinions or religious beliefs), financial information. We may also collect personal information, including any contact we have with you in person, by telephone, email or online as well as publicly available information.

3.2 **Online Services**

When you use our online services, we may collect the following:

- information you provide by completing subscription, registration and application forms (including when you submit material or request further services);
- information you provide to us if you contact us, for example, to report a problem with our online services or raise a query or comment; and
- details of visits made to our online services such as the volume of traffic received, logs (including, the internet protocol (IP) address and location of the device connecting to the online services and identifiers about the device and the nature of the visit) and resources accessed.

3.3 **Careers and Recruitment**

If you apply for a job, work placement, or volunteer you may need to provide information about your education, employment, racial background and state of health. Your application will constitute your express consent to the School's use of this information to assess your application and to allow the School to carry out both recruitment analytics and any monitoring activities which may be required of the School under applicable law as an



employer. We may also carry out screening checks (including reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks) and consider you for other positions. We may disclose your personal information (including diversity and equal opportunities data) to academic institutions, recruiters, screening check providers, health service providers, professional and trade associations, law enforcement agencies, recruitment analytics and diversity research providers, referees and your current and previous employers. The School may also collect your personal information from these parties in some circumstances. The School may conduct social media checks through publicly accessible social media profiles. Without your personal information, we may not be able to progress considering you for positions with us. Paragraph 9 explains how long the School will retain your data.

3.4 **Alumni**

If you are a former student, former parent, teacher or staff member and wish to join the alumni society, the School will collect personal information such as that listed above under paragraph 3.1 above, including any basic details of your time with us (for example years and house). Visit <https://alumni.reading-school.co.uk/> to access the Reading School Alumni Society website ("**Alumni Society**") and update your personal information, if applicable. We reserve the right to refuse access to any person at our absolute discretion.

In order to join the Alumni Society you must first complete the registration process on the alumni website. In doing so you must provide accurate, current and complete information. You will have the option to provide more personal information such as information about your professional qualifications and information about your preferences and engagement with the Alumni Society. You should update your information when it becomes outdated by letting the School know via the Alumni Society website or emailing alumni@reading-school.co.uk.

We use this information to customise the content we deliver on our websites and in publications, to connect you with other alumni and to contact you, (by email and other means) about our school, alumni and community news, events and philanthropic opportunities, unless you use the "unsubscribe" option in communication or email alumni@reading-school.co.uk. The Alumni Society is operated by [Toucan Tech](#).



3.5 **Photography and Video**

As part of our School activities and events, we may take photographs and videos of individuals within our school community.

We will obtain written consent from parents, for photographs and videos to be taken of students for communication, social media, marketing and promotional materials.

For events and activities, parents, students and alumni are regularly provided with opportunities to inform us if they do not want to be included in photographs and videos.

For information on the taking, sharing and storage of photographs, videos, and for CCTV use, please refer to the Schools [Taking, Storing and Using Images of Children Policy](#).

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

The School needs to process (and where appropriate share with third parties) personal data about individuals for several purposes as part of its operations. Some of this activity, the School will need to carry out 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, and retain a record if appropriate for future applications or openings;
- to carry out necessary credit checks, whether with previous schools or other third-party sources, including verifying that parents are not subject to sanctions;
- to provide education services (including musical education, physical training, spiritual development, career services, and extracurricular activities to pupils);
- to monitor pupils' progress and educational needs, including where such services are provided remotely;



- to report to and liaise with parents and guardians about their child's progress, welfare, and development, including in report and parents' meetings;
- to organise and manage meetings, events, and social engagements for pupils, parents and alumni;
- to maintain relationships with alumni and the School community, including direct marketing of fundraising activity and events;
- for the purposes of donor due diligence, and to confirm the identity of prospective donors and their background, including donor wealth screening;
- to promote the School and its activities;
- to inform of any changes to our website, services, or goods and products;
- for 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 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;
- to safeguard pupils' health and welfare and provide appropriate pastoral care (including following the requirements and recommendations of the government's guidance on Keeping Children Safe in Education (or "KCSIE"));
- to provide necessary medical care and to take appropriate action in the event of an emergency or accident, including disclosing details of an individual's medical condition where it is in the individual's interests to do so, for example, for medical advice, insurance purposes, or to organisers of School trips;
- to monitor (as appropriate) the use of the School's IT and communications systems in accordance with the School's [E-Safety Policy](#);
- to make use of photographic images and video of pupils in School publications, on the School's website, and other communication channels owned by the School, in accordance with the [Home School Agreement](#);
- for security purposes, including CCTV in accordance with the School's [CCTV policy](#);



- for the prevention and detection of crime and to assist with investigations (including criminal investigations) carried out by the police and other competent authorities;
- for regulatory and legal purposes and to comply with its legal obligations;
- for regulatory record-keeping/compliance purposes concerning immigration requirements, as an employer and/or visa sponsor;
- to carry out or cooperate with any School or external complaints, disciplinary or investigation process;
- to obtain appropriate professional advice and insurance for the School; and
- where otherwise reasonably necessary for the School's purposes.

In addition, the School will on occasion need to process special category personal data (concerning health, ethnicity, religion, trade union membership, 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 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 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;
- to comply with public health requirements, for example in respect of Covid-19 (or similar) testing: including managing on-site testing and/or processing the results of tests taken by pupils or other members of the School community and sharing this information with relevant health authorities;
- to provide educational services in the context of making reasonable adjustments for disabilities and/or special needs;
- to provide spiritual education in the context of any religious beliefs;
- in connection with recruitment and employment of its staff, for example, DBS checks, welfare, union membership or pension plans, and in a pastoral, complaint, or disciplinary context;



- for legal and regulatory purposes (for example child protection, diversity monitoring, and health and safety and immigration/VISA sponsorship compliance) and to comply with its legal obligations and duties of care;
- to maintain and develop our relationship with you;
- To protect, establish, exercise or defend legal rights; and
- Process and respond to requests, enquiries or complaints received from you.

5. **WHO HAS ACCESS TO PERSONAL DATA AND THIRD PARTIES**

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

- appropriate contractors;
- professional advisors (e.g. auditors, lawyers and insurers);
- agencies working on behalf of the school, for example for admissions matters or donor relations;
- government authorities (e.g. HMRC, DfE, police, or the local authority);
- examination boards;
- appropriate regulatory bodies (e.g., the Teaching Regulation Agency, The Department for Education (DfE), the Charity Commission, or the Information Commissioner);
- Youth and Careers Support Services. Once students reach the age of 13, we also pass student information to our local authority and or provider of youth support services as they have responsibility in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996. This enables them to provide careers services;
- Observatory for Mathematical Education (OME) based at University of Nottingham for cohort study activities;
- Child Welfare Services;
- peripatetic Teacher;
- Members of Stage 3 complaints panels, in accordance with the [School's complaints policy](#);
- The Department for Education (DfE) for Workforce Census data collection. We are required to share information about our school workforce with the (DfE) under



section 5 of The Education (Supply of Information about the School Workforce) (No.2) (England) Regulations 2007 and amendments;

- Teachers' Pension for teachers' pension entitlements;
- Local Government Pension Scheme (Berkshire Pension) for the associate staff pension entitlements;
- third party services (e.g. websites, social media, research and banking payment);
- third party technology organisations (e.g. cloud service providers);
- third parties with whom we have co-promotional arrangements (such as jointly sponsored events); and
- regulatory authorities, government agencies, law enforcement agencies and other third parties.

On occasion, we include links to third parties on our website or in other school communications, such as newsletters. Where we provide a link, it does not mean that we endorse or approve that site's policy towards visitor privacy. You should review their privacy policy before sending them any personal data. We may also share data about you and your children with other schools or educational establishments, for example, when you apply to a different school, or with organizations which run extracurricular activities or trips.

Data may also be shared with related parties where legitimate interest is evident. These associated bodies may include, but not be limited to:

- The Old Redingensians Association;
- The Reading Foundation;
- The Reading School Overseas Trading Corporation;
- Future Stories Community Enterprise; and
- The Reading School Parents Association

We will always take reasonable steps to ensure that the personal data shared is kept confidential and secure.



6. SECURITY OF PERSONAL DATA

We take the security of personal data seriously and have implemented appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction, or damage. These measures include:

- regular data protection training for staff;
- use of strong passwords and encryption;
- regular security assessments and audits;
- secure storage and disposal of personal data;
- restriction of access to personal data to authorised personnel only; and
- all staff and third party providers with access to confidential information are subject to confidentiality obligations.

In the event of a data breach, we will take appropriate steps to mitigate the impact and comply with our legal obligations, including notifying affected individuals and the Information Commissioner's Office where necessary.

7. COOKIES

We use cookies on our online services. Please see our [Cookie Policy](#) for details.

8. THIRD PARTY SITES

Our websites contain links to other sites which are controlled by third parties.

Visitors should consult these other sites' privacy policies and please be aware we do not accept responsibility for their use of information about you.

9. DATA RETENTION

We will retain personal data only for as long as necessary for the purposes for which it was collected or as required by law. We have implemented a data retention policy which sets out the retention periods for different categories of personal data. For example:

- **pupil records:** retained for up to 7 years after the pupil leaves the School;



- **teacher and staff records:** retained for up to 7 years after employment ends;
- **financial records:** retained for up to 7 years for tax and audit purposes;
- **CCTV footage:** retained for up to 1 year unless required for an investigation;
- **job applicants:** If your application for employment is unsuccessful, the school will hold your data on file for 6 months after the end of the relevant recruitment process; or longer with your permission, and
- **alumni/donor/friends and supporters:** We will retain your personal information for as long as is reasonably necessary in the circumstances. You may instruct us to delete your information at any time.

Historical archives of non-sensitive nature regarding students' attendance at the school, their house and participation in extra-curricular activities may be retained indefinitely for the sake of historical enquiry, no academic or disciplinary records will be maintained as part of this archive.

We will take reasonable steps to securely delete or anonymise personal data when it is no longer needed.

10. **YOUR RIGHTS**

You have the following rights regarding your personal data:

- the right to access your personal data;
- the right to rectify your personal data;
- the right to erase your personal data;
- the right to restrict the processing of your personal data; and
- the right to data portability.
- the right to object to the processing of your personal data; and
- the right not to be subject to automated decision-making

If you wish to exercise any of these rights, please contact us in writing at secretary@reading-school.co.uk. We will respond to your request within one month, although we may need to extend this period for complex requests. We may also need to verify your identity before processing your request.



We may refuse to provide access and may charge a fee for access if the relevant legislation allows us to do so, in which case we will provide reasons for our decision as required by law.

Information we hold about you should be up-to-date and accurate. Please advise us in writing of any changes to your information using the contact details set out at paragraph 14 below.

11. **IF YOU DO NOT WANT TO RECEIVE INFORMATION FROM US**

If you receive materials relating to our services by email or post, you may withdraw your consent for us to send these to you at any time, by using the “unsubscribe” option included in the email or other material. Alternatively, you can let us know by sending an email to secretary@reading-school.co.uk.

12. **STATUS OF THIS PRIVACY NOTICE**

We review this Privacy Notice regularly and reserve the right to revise it or any part of it from time to time to reflect changes in law or technology practices. It is your responsibility to review the amended Privacy Notice.

13. **COMPLAINTS**

If you have any concerns about the way we handle your personal data, please contact us at secretary@reading-school.co.uk. If you are not satisfied with our response, you have the right to complain to the [Information Commissioner's Office \(ICO\)](#). You can contact the ICO at:

- Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
- Tel: 0303 123 1113

14. **CONTACT AND FURTHER INFORMATION**

If you have any questions about this privacy policy or our data protection practices, please contact us at:

- secretary@reading-school.co.uk



- Reading School Erleigh Road Reading Berkshire RG1 5LW
- Tel: 0118 901 5600

If you make a privacy complaint, we will respond to let you know how your complaint will be handled. We may ask you for further details, consult with other parties and keep records regarding your complaint.

15. **KEY OFFICERS**

- Revd Dr Chris Evans, Headmaster
- Ms Jo Lidbetter, GDPR Lead
- Data Protection Officer (DPO): Satswana, Suite G12 Ferneberga House,
Farnborough, Hampshire, GU14 6DQ; Tel: 01252 759177; Email: info@satswana.co.uk

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