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Reading School

General Data Protection Regulations (GDPR) Privacy Notice

Responsibilities

Policy Owner: Office Manager

Governors Committee Finance

Audit Control

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Statutory policy Yes

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Document Control and Approval

Version Control

Version	Author	Summary of Changes	Reviewed By	Date
1.0	Jonathan Hitchinson	Policy created	Jonathan Hitchinson	01/05/2021
1.1	Jo Lidbetter	Ability to withdraw consent to use photographs and videos	Jo Lidbetter	11/01/2023
1.2	Jo Lidbetter	Updated to include Prospective Students and Parents, Parents/Carers, Job Applicants, Volunteers, Alumni, PGCE Students, Visitors, Contractors, Governors and Academy Trust Members; DPO Contact details	Jo Lidbetter	24/03/2023
1.2		Approved by Finance Committee		16/05/2023
1.3	Jo Lidbetter	Updated to include additional external third-party software for Prospective Students (Admissions) data collection	Jo Lidbetter	30/04/2024
1.4		Updated to include OME as data controller for research study of student cohorts		15/05/2024
1.5		Updated to include length of time photographs are kept on school website		24/05/2024
1.6		Updated to include IRIS BioStore Ltd as the biometrics processor		19/11/2024

Responsibilities

Job title	Responsible for;
Office Manager	Policy Owner
Chief Operating Officer	Policy Overview
Finance	Committee Responsible

Policies Linked

Policy name	File location

Forms Linked

Form name	Form location

Staff that need to sign



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Staff Group	Form location



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Introduction

Reading School aims to ensure that all personal data collected about staff, pupils, parents, governors, visitors and other individuals is collected, stored and processed in accordance with the [UK General Data Protection Regulation \(UK GDPR\)](#), tailored by the [Data Protection Act 2018 \(DPA 2018\)](#). Also the [Education Act 1996, Article 6](#) and [Article 9](#) of the GDPR

This notice is to help Prospective Students and their Parents, Students, Parents/Carers, Staff, Job Applicants, Volunteers, Alumni, Donors, PGCE Students, Visitors, Contractors, and our Governors/Academy Trust Members, understand how and why we collect personal information, and what Reading School does with that information. It also explains the decisions that you can make about your own information.

Reading School is the data controller of the personal information you provide to Reading School. This means the school determines the purpose for which, and the manner in which, any personal data relating to students and their families is to be processed.

What is personal information?

Personal information is information that Reading School collects, uses, stores and shares (where appropriate) about Prospective Students and their Parents, Students, Parents/Carers, Staff, Job Applicants, Volunteers, Alumni, Donors, PGCE Students, Visitors, Contractors, and our Governors/Academy Trust Members -which identifies them and relates to them. This includes information such as;

Prospective Students and their Parents/Guardians (Admissions)

- Contact details, test results, attendance records, your characteristics, like your ethnic background or any special educational needs, details of any behaviour issues or exclusions, photograph

Students

- Personal information such as your contact details, your test results, your examination results, your attendance records, your characteristics, like any special educational needs, any medical conditions or allergies you have, details of any behaviour issues or exclusions, photographs or video recordings, CCTV images, data about your use of the school's information and communications system, safeguarding information (such as court orders or professional involvement from others), any information about any special educational needs you may have

Parents/Carers

- Name and title, home address, email address and telephone numbers, information about your current employment if you have chosen to tell us;



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Information enabling us to gain a Disclosure and Barring Service (DBS) check if you are hosting a student from a partner school; Information about your child/children (please see student and alumni sections); recording of information on booking and/or payment for school events or for non-curricular school trips, information on voluntary contributions, voluntary contribution made for school trips, visits and extra-curricular activities, data from any donations to the Reading School Charitable Fund, the data you provide to enable us to collect this donation will be subject to our donor privacy policy (see Donor section)

Staff

- Personal information (such as name, employee or teacher number, bank account details, payroll records, national insurance number and tax status information, next of kin and emergency contact numbers), Recruitment information (such as copies of right to work documentation, references and other information included in a CV or cover letter as part of the application process; Contract information (such as start dates, hours worked, post, roles and salary information). Work absence information (such as number of absences and reasons); Qualifications (and, where relevant, subjects taught); Employment records including (but not limited to) work history, job titles, working hours, training records, and professional memberships, Performance information such as training records and Professional Development Reviews, Outcomes of any disciplinary and/or grievance procedures and/or any safeguarding investigations, copy of driving licence, photographs, CCTV footage, Data about your use of the school's information and communications system, Special categories of data including characteristics information such as marital status, gender, age, race, ethnic group, religious beliefs, sexual orientation and political opinions, (when appropriate) Information about criminal convictions and offences and may hold data received from other organisations, including other schools and social services and the Disclosure and Barring Service in respect of criminal offence data. While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us, which we will make clear to you whenever we seek to collect information

Job Applicants

- Personal information (such as name, address and contact details, including email address and telephone number; Qualifications and details including skills, experience and employment history; information about your current level of remuneration, including benefit entitlements; whether or not you have a disability for which the school/trusts/trusts needs to make reasonable adjustments during the recruitment process; information about your entitlement to work in the UK; and equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief, recordings, CCTV images, data about your use of the school's information and communications system, safeguarding information (such as Court Orders or Professional Involvement from others), any information about any Special Educational Needs you may have

Volunteers



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- Personal information such as name, address, contact details, photograph Curriculum Vitae or other profiles, next of kin and emergency contact numbers CCTV, Photographs and video footage, information gathered from business and social media sources in the public domain, e.g. LinkedIn, Facebook, References, and where relevant, DBS checks, training records, information on special requirements, health or medical conditions, information relating to project monitoring, such as the number of hours spent on a project, information related to availability or periods of unavailability, outcomes of any disciplinary and/or grievance procedures and/or any safeguarding investigations. We will ask you to consent to having a social media check with a third-party supplier and you may be requested to follow our Safer Recruitment process depending on the volunteer role you are undertaking.

Alumni

- We could hold a selection of the above personal information.

Donors

- We could hold a selection of any the above that donate to Reading School directly or indirectly

PGCE Students

- Personal information – such as contact details, copies of right to work documentation, references, evidence of qualifications, employment records, including work history, job titles, training records and professional memberships
We may also collect, store and use information about you that falls into “special categories” of more sensitive personal data. This includes information about (where applicable) race, ethnicity, religious beliefs, sexual orientation and political opinions, disability and access requirements

Visitors

- Personal information – such as name and photograph, CCTV, Photographs and video footage

Contractors (Self Employed)

- Personal information such as contact details, next of kin and emergency contact numbers, salary, annual leave, pension and benefits information, bank account details, payroll records, national Insurance number and tax status information, recruitment information, including copies of right to work documentation, Enhanced DBS status, references and other information included in a CV or cover letter or as part of the application process, qualifications and employment records, including work history, job titles, working hours, training records and professional memberships, photographs and video footage, CCTV footage, data about your use of the school’s information and communications system, evidence of DBS checks



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Governors and Academy Trust Members

- Personal data such as information required for statutory purposes such as registers of pecuniary and non-pecuniary interest that you or other members of your household may have in relation to school business, and information required to be provided to the DFE and Companies House, contact details, curriculum vitae or other profiles, next of kin and emergency contact numbers, references, photographs, and where relevant DBS checks, information related to availability or periods of unavailability

How and why does Reading School collect and use personal information?

Prospective Students and their Parents/Guardians (Admissions)

- Reading School's Admissions Team supports parents with the school admissions process. The Secondary school Year 7 admissions process consists of several stages starting with the Reading School registration, which begins in May, through to the National Offer Day in March. The Secondary school Sixth Form admissions process consists of several stages starting with the Reading School registration, which begins in December, through to the Registration Day in August.

The In Year Admissions process includes all children that move through the school year, across all year groups.

The Sixth Form Admissions process includes all children that apply for a place at the school.

We work to ensure that every child is offered a school place suitable to their age, ability and needs.

We hold some personal information about you/your child to decide if you/your child qualify(s) for a place at Reading School. While in most cases you/your child must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data. We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't. In order to help you, we may also get information about you from some other places too – like other schools, universities, the local council and the government.

We use your personal information to:

- assist Reading Borough Council to allocate your child a school place for the following school year through the co-ordinated admissions process for Year 7. After Reading School have manually prioritised applications into their own oversubscription criteria order, Reading Borough Council's admissions system works out the highest ranked school preference that each child can be offered
- rank according to our oversubscription criteria for Year 7, In-Year Applications and Sixth Form applications.
- facilitate school admission appeals for Reading School
- ensure the integrity of the Reading School test process and its admissions policies.



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We collect your data through external third parties Applicaa. For details of their Privacy Notices please visit their websites <https://applicaa.com/privacy-policy/> and <https://www.epc.co.uk/privacy-policy-cookies>. Your data is shared with third parties involved but not limited to EPC and Atom.

We will collect your Registration Form when you sit your test at Reading School. This information includes:

- a photograph of you
- your Date of Birth
- your Postcode
- details of Pupil Premium or Looked After Child Status
- information about medical issues

Sixth Form Admissions

We hold some personal information about you to decide if you qualify for a place at Reading School. While in most cases you, or your parents/carers, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data. We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't.

In order to help you, we may also get information about you from some other places too – like other schools, the local council and the government. This information may include, but is not restricted to:

- your contact details
- your exam results
- your attendance records
- your characteristics, like your ethnic background or any special educational needs
- details of any behaviour issues or exclusions
- photograph

Why we use this data - when you come to sit the Year 7 or In-Year Entrance Test

We use this data to help comply with our Admissions Policies and to administer the Reading School Entrance test. Specifically, we will use this data to:

- ensure that we can correctly identify you
- ensure you are deemed fit and well to sit the entrance test
- get in touch with you and your parents when we need to
- check if you meet our admissions criteria
- look after your wellbeing if you come here to sit an exam

Sixth Form Admissions

We use this data to help comply with our Admissions Policies and to:

- get in touch with you and your parents when we need to
- check if you meet our admissions criteria
- ensure that we can correctly identify you



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The Appeals Process

During the Appeals Process, the Admissions Team will collect information and data which is stored on the school's server and storage platforms. This information is kept only for as long as is necessary for the Appeals process and is securely destroyed in line with our Retention Schedule.

Students

The school's primary reason for using personal information is to provide students with an education. We have set out below examples of the different ways in which we use personal information and where this personal information comes from:

- to support student learning
- to monitor and report on student progress
- to provide appropriate pastoral care
- to get in touch with pupils and their parents where necessary
- to keep children safe, look after wellbeing and protect vulnerable individuals (food allergies or emergency contact details)
- to track the quality of our teaching and the learning that takes place at Reading School
- to assess the quality of our services
- to promote the school and communicate with students and their parents about ways of supporting the school, including once the student has left the school
- to provide references for employment
- to protect students and others and for site security
- to meet the statutory duties placed upon us by the Department for Education (DfE)
- to comply with the law regarding data sharing

Admissions forms provide us with lots of personal information. We get information from students, parents, carers, teachers and other students. Previous school(s) also give us information about our students so that we can teach and care for them.

The categories of student information that we collect, hold and share include:

- personal information (such as name, unique student number and address. date of birth and any photo of their likeness that is provided with their application)
- photographs or video recordings, CCTV images
- characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- medical information (such as name of GP, relevant medical conditions)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- behavioural information (such as behavioural incidents, exclusions)
- assessment information (such as national curriculum assessments)
- Special Educational Needs information
- school history (such as where students go when they leave us)



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- post 16 learning information

Sometimes we get information from doctors and other professionals to help us better understand student needs and to look after them. Whilst the majority of student information is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform students whether they are required to provide certain information or if they have a choice in this.

We collect this information to help the school run properly, safely and to let others know what we do here. Here are some examples in more detail:

- We need to tell the appropriate staff if a student is allergic to something or need extra help with some tasks, or special educational needs.
- We may need to report some information to the government. For example, we may need to tell the local authority who attends the school or let them know if we have any concerns about student welfare.
- We may need information about any court orders or criminal matters which relate to students. This is so that we can safeguard student welfare and wellbeing.
- Students from another country, we have to make sure that they have the right to study in the UK. We might have to provide information to UK Visas and Immigration who are part of the government.
- Depending on where students go when they leave us, we may need to provide information to other schools, colleges and universities or potential employers. For example, we may share information about examination results and provide references. We may need to pass on information regarding student support.
- We will need to share information about with examination board, for example, if students require extra time in examinations.
- We may need to share information with the police or our legal advisers if something goes wrong or to help with an inquiry.
- Occasionally we may use consultants, experts, peripatetic teachers and other advisers to assist the school in fulfilling its obligations and to help run the school properly. We might need to share information if this is relevant to their work.
- If students misbehave in a serious way, and the police have become involved, we may need to use information about the action taken by the police.
- We may share some information with our insurance company to make sure that we have the appropriate insurance cover.
- We may share academic and (where fair)behaviour records with parents or carers so they can support student schooling.
- We will only share information with other people and organisations when we have a good reason to do so e.g., field studies, establishment and education visit organisers for risk assessment purposes. In exceptional circumstances, we may need to share it more widely than we would normally.
- We may transfer information to any association, society or club set up the purpose of maintaining contact with students and ex students and their parents/guardians or for fundraising, marketing or promotional purposes relating to the School, where consent has been obtained



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- We will monitor student web browsing, the internet and mobile electronic devices e.g., iPad. This is to be certain students are complying with our E Safety Policy when using devices or not putting yourself at risk of harm.
- We may use photographs or videos for the school's website and social media sites or prospectus to show prospective students what we do here and to advertise Reading School and the Reading School Parents' Association (RSPA). Photographs or videos may be kept on the school's website for up to ten years or more.
- We may continue to use these photographs and videos for teaching purposes, for example, to record a drama lesson or music performance or for fundraising events.
- We publish our public examination results, sports fixtures and other news on the website and put articles and photographs in the local news and on social media to tell people about what we have been doing.
- Students may withdraw their consent to use photographs or videos at any time.
- We will process financial information relating to students. For example, if an application is made for Free School Meals, Pupil Premium Grant, through the Reading School Promise or 16-19Bursary, so we can ensure students are provided with the financial assistance they need for educational visits or buying school books and items.

Parents/Carers

We use personal data to:

- Update parents on school news and events which may be of interest to them or their child
- Send progress reports of achievement regarding your child
- Recruit parent volunteers
- Make fundraising appeals

Staff

We use school workforce data to:

- Enable the development of comprehensive picture of the workforce and how it is deployed
- Inform the development of recruitment and retention policies
- Enable individuals to be paid
- Support effective performance management
- Facilitate safe recruitment, as part of our safeguarding obligations towards students
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring
- Meet Health and Safety Legislation, including Fire in the Workplace.

Whilst the majority of information staff provide is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform staff whether they are required to provide certain school workforce information to us or if they have a choice.



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Reading School collects this information to help the school run effectively and efficiently and provide a safe environment.

In addition:

- We report some information to the government e.g. UK Visas and Immigration Control
- Occasionally we may use consultants, experts and other third-party advisers to assist the school in fulfilling its obligations. We might need to share information with them if this is relevant to their work.
- We will monitor staff use of web browsing, the internet and mobile electronic devices e.g., iPads to comply with the school's E-Safety.
- We may use photographs or videos for the school's website and social media sites or prospectus. We may continue to use these photographs and videos after staff have left school. Sometimes we use photographs and videos for teaching purposes. Staff may withdraw their consent to use photographs or videos at any time.
- We publish news on the website and put articles and photographs in the local news to inform the public about our activities. Photographs or videos may be kept on the school's website for up to ten years or more.
- We will process financial information relating to staff for contractual reasons, pension returns etc.

Job Applicants

The school may collect this information in a variety of ways. For example, data might be contained in application forms, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests. The school may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. The school will seek information from third parties during the selection process (such as references and social media checks) and prior to a job offer being made. Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

The school needs to process data to take steps at your request prior to entering into a contract with you. It may also need to process your data to enter into a contract with you. In some cases, the school needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The school has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the school to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The school may also need to process data from job applicants to respond to and defend against legal claims. The school may process information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. This



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is to carry out its obligations and exercise specific rights in relation to employment. Where the school processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes. The school is obliged to seek information about criminal convictions and offences, and to facilitate safe recruitment, as part of our safeguarding obligations towards students (also see *Safeguarding* Where the school seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

Volunteers

We process this data to help us run the school, including to facilitate safe recruitment of volunteers, as part of our safeguarding obligations towards students, enable ethnicity and disability monitoring, support the work of staff and students at Reading School.

Alumni

Reading School Alumni Society supports a global community of alumni. In order to inform and engage alumni in a bespoke manner, the school processes personal data. This helps to ensure alumni get the best information and contact available and also helps us, where appropriate, to ask for your support with the things we believe you care about.

Prior to you leaving the school as a pupil we will write to you to ask whether you wish to be contacted by the school in the future as an alum/alumna. Data regarding alumni (including whether they wish to be contacted by the school in the future) is held on specific alumni databases.

This privacy notice relates to these records. It does not apply to records created whilst a student is on roll at Reading School. The privacy notice relating to data held by the school in relation to students is found in the section above.

As an alum, you may wish to make a donation to the school in the future. Where this is the case, you will also be classified as a donor. There is a separate donor privacy section that provides information regarding how this specific data is held.

Donors

Donations to Reading School are received to benefit students at Reading School. These donations are processed by Reading School using a secure database which is password protected to manage its records, with access limited to appropriately trained staff in the Society Office. This database is provided by ToucanTech Limited, a company registered in England. Data is collected and updated from information provided by donors when making a donation. In some cases, we may supplement the information you have given us with data from elsewhere. Examples could include conducting appropriate due diligence to safeguard the reputation of Reading School in the case of significant financial transactions. Sources of data could include information gathered from a news article, online media, or publicly available directories or Companies House.

The data we collect in relation to donors may include:



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- Your bank account number/card number, name and sort code (used for processing Direct Debits/ Standing Order Mandates and credit/debit cards). In addition, dependent on the way in which you wish to donate to Reading School, the platforms that can be used on behalf of Reading School, for making donations include, but are not limited to, Stripe, CAFDonate and Reading School is recognised as an approved institution, enabling gifts from the USA made via British Schools & Universities Foundation;
- Where donors who opt to enhance donations through a matched funding company, details will be recorded.
- Gift amount, purpose, donor acknowledgement, date and method of payment including cheque numbers or payment references
- Tax status and Gift Aid Declaration information
- Your spouse/partner's name/child's name
- Your contact details
- Record of verbal or email conversations/meetings including any personal interests which relate to financial gifts made to the school

PGCE Students

We collect information from our PGCE Provider where you have applied for a PGCE course. The purpose of processing this data is to support your training and mentoring, facilitating safe recruitment, as part of our safeguarding obligations towards students, enabling equalities monitoring, ensuring that appropriate access arrangements can be provided for candidates that require them

Visitors

We use the data to safeguard pupils, to meet Health and Safety Legislation, to meet Fire in the Workplace Legislation, to keep the site secure and safe, to assist with the organisation of events and meetings to fulfil a contract e.g., the letting of the school premises.

Contractors (Self Employed)

We use the data to help us run the school, to enable you to get paid, facilitate safe recruitment, as part of our safeguarding obligations towards pupils, allow better financial modelling and planning.

Governors and Academy Trust Members

We process the data to help us run the school including to facilitate safe recruitment of Governors, as part of our safeguarding obligations towards students, enable ethnicity and disability monitoring, support the work of staff and students at Reading School, to meet statutory requirements.

We publish relevant personal data (names, roles in the School and pecuniary and non-pecuniary interests) in the interests of transparency and good governance

Our legal grounds for using information



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Reading School holds the legal right to collect and use personal data relating to students their families and the workforce, and we may also receive information regarding students from previous school, Local Authority and/or the Department for Education.

We collect and use personal data in order to meet legal requirements and legitimate interests set out in the GDPR and UK Law, including those in relation to the following:

- [Article 6](#) and [Article 9](#) of the GDPR
- [Education Act 1996](#)
- [Regulation 5 of the Education \(Information about Individual Pupils\) \(England\) Regulations 2013](#)

Legitimate interests

This means that the processing of personal data is necessary for appropriate and genuine interests except where the processing is unfair to you. The school relies on legitimate interests for most of the ways in which it uses personal information.

Specifically, Reading School has a legitimate interest in:

- Providing its students with an education
- Safeguarding and promoting student welfare
- Promoting the objects and interests of the school
- Facilitating the efficient operation of the school.
- Ensuring that all relevant legal obligations of the school are complied with.

In addition, personal information may be processed for the legitimate interests of others. For example, we may use information when investigating a complaint made by students or the workforce.

Legal obligation

Where the school needs to use personal information in order to comply with a legal obligation, for example to report a concern about student wellbeing to Children's Services. We may also have to disclose information to third parties such as the courts, the local authority or the police where legally obliged to do so.

Vital and Public Interests

Reading School considers that it is acting in the public interest when providing education. Reading School considers it is acting to protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious or to prevent someone from being seriously harmed or killed.

Substantial Public Interest

The processing is necessary for reasons of substantial public interest.



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Special Categories

Reading School must also comply with an additional condition where it processes special categories of personal information. These special categories include: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information (processed by IRIS BioStore Ltd), health information, and information about sex life or orientation.

Legal claims

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors or insurers.

Medical Purposes

This includes medical treatment and the management of healthcare services. We may ask for your consent to use your information in certain ways. If we ask for your consent to use your personal information, you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid.

Who do we share information with?

In some cases, your data will be outsourced to a third-party processor; however, this will only be done with your consent, unless the law requires the school to share your data. Where the school outsources data to a third-party processor, the same data protection standards that Reading School upholds are imposed on the processor.

Prospective Students and their Parents

We do not share personal information about you with anyone outside the school without permission from you or your parents/carers, unless the law and our policies allow us to do so. The exception to this is when we need to share certain details with our third-party suppliers in relation to the marking and standardisation of the entrance test.

Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:

- Your family and representatives - where it is in their legitimate interest

Students

We routinely share student information with:

- Universities and other establishments that the students attend after leaving us
- Our local authority
- The Department for Education (DfE). We are legally required to share students' data with the DfE on a statutory basis. This data sharing underpins the school's funding and educational attainment policy and monitoring.
- 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



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year olds under [section 507B of the Education Act 1996](#). This enables them to provide services as follows:

- Careers advisers
- Observatory for Mathematical Education (OME) based at University of Nottingham for cohort study activities
- A parent or carer can request that only their son's name, address and date of birth is passed to their local authority or provider of youth and careers support services by informing us. This right is transferred once students reach the age of 16.
- Examination Boards
- Child Welfare Services
- Peripatetic Teachers

Parents/Carers

- We will share your data with companies we work with to provide services to benefit students, such as a company who we engage with to organise a school trip or a company who we engage to take student or whole school photographs, or organisations running visits or school events.
- We do not disclose personal data to third parties or Government agencies unless the law requires us to do so or exigent circumstances require us to protect the safety of our users or the public.

Staff

We routinely share workforce information with:

- **The Department for Education (DfE) for Workforce Census data collection.** Reading School shares personal data with the Department for Education (DfE) on a statutory basis. The data sharing underpins workforce policy monitoring, valuation, and links to school funding/expenditure and the assessment educational attainment. 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.

Job Applicants

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the administration and HR team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles. If you are shortlisted, we will ask you to consent to having a social media check with a third-party supplier. The school will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The school may then share your data with employment background check providers to obtain necessary background checks, the Disclosure and Barring Service to obtain necessary criminal records checks and any third-party HR or Payroll provider to enable



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contractual documentation to be produced and to pay you. Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with our local authority – to meet legal obligations to share certain information we have with it, such as shortlists of candidates for a headteacher position, suppliers and service providers to enable them to provide the service we have contracted for such as HR and recruitment support, professional advisers and consultants – to enable them to provide the service we have contracted them for, police forces, courts, tribunals – when we are legally obliged to do so, employment and recruitment agencies

Volunteers

We create a file for each volunteer. The information contained in this file is kept secure with appropriate security measures in place. It is only used for purposes directly relevant to your role as a volunteer and accessed by those staff authorised to do so.

Alumni

If you are a former employee, pupil, parent, grandparent or relative of a pupil and wish to join our alumni programme we will collect personal information such as your contact details (including addresses and phone numbers), information about your current employment and professional qualifications, basic details of your time with us and information about your preferences and engagement with the programme. Please see the Alumni Privacy Policy [Privacy | Reading School Alumni Society \(reading-school.co.uk\)](https://www.reading-school.co.uk/privacy) for additional information about how we collect, store and protect the data.

Donors

The law requires us to tell you the lawful basis upon which we process your data. Your data will not be shared with any other third party unless there is a statutory reason for us to do so or without prior written consent from you.

The personal details held about you will only be used to process your donation and update you on projects you have donated to or expressed an interest in. Many activities are carried out to fulfil an agreement, e.g. the processing of a donation. Reading School will not share your data with third parties except where there is a legal obligation to do so, e.g., if you Gift Aid a donation, then we are required to tell HMRC the name and address of the donor and the date and amount of the donation. Our auditors will also inspect our records to ensure that donations are processed in line with the wishes of a donor. In all other cases, the law allows us to process your data if it is in our legitimate interests to do so, provided such processing is not overridden by your interests or your fundamental rights and freedoms. Practically speaking, this means that we carry out an exercise to check that we will not cause you harm by processing your data, that the processing is not overly intrusive and that we will only do so in a way which is described in the Privacy Notice.

Your data is kept securely with appropriate security measures in place.

PGCE Students



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We do not share information about you with any third party without your consent unless the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with our PGCE Provider where you have applied for a PGCE course, OFSTED - who will require high level data to assess our recruitment performance against national objectives, the Disclosure and Barring Service, to carry out checks regarding your suitability to teach, UCAS - including confirming success or otherwise of application, the Student Loan Company - to confirm that you have received a conditional offer on our course so that your loan application can be processed pending an offer being made final, suppliers and service providers – to enable them to provide the service we have contracted them for such as HR and recruitment support, professional advisers and consultants – to enable them to provide the service we have contracted them for, police forces, courts, tribunals – when we are legally obliged to do so, we may also share your data with organisations running trips and visits where you are accompanying students. This may result in your data being transferred to a different country. Where this is the case, appropriate safeguards are taken by us and our agents to ensure your data is protected

Visitors

We may share visitor information with our visitor signing-in system provider, the police, Insurance companies, HSE - for accident reporting, any requests from third parties in the event of a safeguarding incident

We do not share information about visitors with anyone without consent unless the law and our policies allow us to do so.

Contractors (Self Employed)

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with your family or representatives – should we need to contact them in an emergency, our regulator Ofsted – for inspection and monitoring purposes, where appropriate (e.g. IR35) our payroll provider and HMRC, suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll, our auditors – to enable them to provide the service we have contracted them for, professional advisers and consultants – to enable them to provide the service we have contracted them for, police forces, courts, tribunals – when we are legally obliged to do so

Governors and Academy Trust Members

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so. However, it is a legal requirement that your name and certain other items of personal data will be published on the School Website and in the annual Statement of Accounts and that your information is shared with Companies House - to enable the school to be managed and run, with our Auditors -



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to enable the financial monitoring of the school as is required by law, any other party required as required by the DfE.

Where it is legally required, or necessary (and it complies with data protection law), we may also share personal information about you with suppliers and service providers – to enable them to provide the service we have contracted them for professional advisers and consultants – to enable them to provide the service we have contracted them for police forces, courts, tribunals – when we are legally obliged to do so

The National Pupil Database (NPD)

The NPD is owned and managed by the DfE and contains information about students in schools in England. It provides important evidence on educational performance to inform independent research, as well as studies commissioned by the DfE. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and examination boards.

We are required by law, to provide information about our students to the DfE as part of statutory data collections such as the school census. Some of this information is then stored in the NPD. The law that allows this is the [Education \(Information about Individual Pupils\) \(England\) Regulations 2013](#).

The Department may share information about our students from the NPD with third parties who promote the education or well-being of children in England by:

- Conducting research or analysis
- Producing statistics
- Providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- Who is requesting the data
- The purpose for which it is required
- The level and sensitivity of data requested; and
- The arrangements in place to store and handle the data

To be granted access to student information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

To find out more about the student information we share with the department, for the purpose of data collections, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.



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To find out more about the NPD, go to [National pupil database - GOV.UK \(www.gov.uk\)](https://www.gov.uk).

For more information about the department's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided student information, (and for which project), please visit the following website: [National pupil database - GOV.UK \(www.gov.uk\)](https://www.gov.uk).

To contact DfE: <https://www.gov.uk/contact-dfe>

Storing data

Prospective Students and their Parents/Guardians

We will create a file for every student seeking a place at the school. The information contained in this file is kept secure with appropriate security measures in place. We will keep personal information about you while you are applying for a place. We have a record retention schedule which sets out how long we must keep information about students and prospective students. We will destroy your data in accordance with it.

During the Appeals Process, the Admissions Team will collect information and data which is stored on the school's server and storage platforms. This information is kept only for as long as is necessary for the Appeals process and is securely destroyed in line with our Retention Schedule.

Students

We hold student data using the retention guidelines set out in the [IRMS Toolkit for School](#).

For example, student files will be retained under the [Limitation Act 1980](#) for the period DOB of the student + 25 years.

We can keep information about students for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful to write a book about the school.

Parents/Carers

We will maintain a record for you until at least such time as your child leaves the school, unless you tell us otherwise. Please note that we are required to keep some financial data for longer periods than this.

Staff

We create and maintain an employment file for each staff member. The information contained in this file is kept secure with appropriate security measures in place. It is only used for purposes directly relevant to your employment and accessed by those



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staff authorised to do so. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our record retention schedule.

In addition, Fire Register data is recorded via our signing-in/out system.

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. If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held is detailed in our Records Management Policy

Volunteers

Reading School considers its relationship with volunteers to be long-term. This means that we will maintain a record for you until such time as you tell us that you no longer wish us to keep in touch and for six years after you conclude your volunteering with us in line with our records retention guidelines. We will then delete the majority of your personal data but will maintain basic personal data to ensure that we do not inadvertently create a new record in the future.

Alumni

Personal data of alumni is stored in one of the school's third-party databases. Access to personal data is restricted to those members of staff who have a requirement to maintain a relationship with you, and is controlled through password protection and user security profiles. If you have opted to receive communication via email, a record of your email address is held by our bulk email provider. Reading School considers its relationship with alumni to be life-long. This means that we will maintain a record for you until such time as you tell us that you no longer wish us to keep in touch. In this instance we will delete the majority of your personal data, but will maintain basic personal data to ensure that we do not inadvertently create a new record in the future.

Donors

Your data is kept securely with appropriate security measures in place.

We will keep your data for as long as is needed to complete the task for which it was collected. Relationships between donors and a school are often long-term ones, and so we expect to keep your data for as long as that relationship exists. Please note that we are legally obliged to keep certain types of data (e.g., finance and gift aid) for specified periods of time.

PGCE Students

Personal data of trainees is stored on school databases. Access to personal data is restricted to those members of staff who have a requirement to maintain a relationship with you and is controlled through password protection and user security profiles. It is



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stored in line with our Records Management Policy. When it is no longer required, we will delete your information in accordance with our Records Retention Schedule.

Visitors

We store, access and protect this data through our visitor signing in system, fire register, CCTV system.

Contractors (Self Employed)

Once the contract with us has ended, we will retain this file and delete the information in it in accordance with our record retention schedule. Please note that we are required to keep certain financial information for set periods of time.

Governors and Academy Trust Members

We create files for with personal data for each Governor. The information contained in these files is kept secure with appropriate security measures in place. It is only used for purposes directly relevant to your role as a Governor and accessed by those staff authorised to do so.

Reading School considers its relationship with Governors to be long-term. This means that we will maintain a record for you until such time as you tell us that you no longer wish us to keep in touch. In this instance we will delete the majority of your personal data when your term of office ceases, but will maintain basic personal data to ensure that we do not inadvertently create a new record in the future

What decisions can you make about your information?

Your rights are as follows:

- If information is incorrect you can ask to correct it;
- You can also ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to;
- You can ask to delete the information that we hold about you in certain circumstances. For example, if you tell us that the information is inaccurate, we can only use it for limited purposes while we check its accuracy.
- You can object to processing of personal data that is likely to cause, or is causing, damage or distress
- You can in certain circumstances, have personal data, blocked, erased or destroyed;
- Claim compensation for damages caused by a breach of the Data Protection Regulations
- Where the processing of your data is based on your consent, you have the right to withdraw this consent at any time e.g., direct marketing and fundraising

If you have any concerns about the way Reading School and/or the DfE is collecting or using your personal data, you can raise a concern with the GDPR School Lead in the first instance or contact Information Commissioner's Office (ICO). The ICO can be



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contacted on 0303 123 1113, Monday –Friday, 9am – 5pm or <https://ico.org.uk/concerns/>.

Key Officers:

- Dr Chris Evans, Headmaster
- Mr Warren Symonds, Head of Operations and Projects and GDPR School Lead
- Ms Jo Lidbetter, Office Manager
- Data Protection Officer (DPO):
Satswana, Suite G12 Ferneberga House, Farnborough, Hampshire, GU14 6DQ;
Tel: 01252 759177; Email: info@satswana.co.uk

