



Founded 1125

# Reading School

## General Data Protection Regulations (GDPR) Privacy Notice

### Responsibilities

**Policy Owner:** Jo Lidbetter,  
Office Manager  
**Governors Committee** Finance

### Audit Control

**Policy created:** 22/06/2021  
**Date of next review** 01/06/2022  
**Version:** 1.0  
**Statutory policy** Yes

# GDPR Privacy Notice

## 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

### 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

Staff Group	Form location



# GDPR Privacy Notice

## Contents

- Introduction ..... 4**
- What is personal information? ..... 4**
  - Students & Parents ..... 4
  - Staff ..... 4
  - Alumni ..... 4
- How and why does Reading School collect and use personal information? ..... 4**
  - Admissions..... 4
    - How we use your personal information ..... 5
    - Why we use this data - when you come to sit the Year 7 or In-Year Entrance Test..... 5
    - The Appeals Process..... 6
  - Students..... 6
  - Staff ..... 8
  - Alumni ..... 8
- Our legal grounds for using information ..... 9**
- Legitimate interests ..... 9**
- Legal obligation..... 9**
- Vital and Public Interests..... 9**
- Substantial Public Interest ..... 10**
- Special Categories ..... 10**
- Legal claims..... 10**
- Medical Purposes..... 10**
- Who do we share information with? ..... 10**
  - Students..... 10
  - Staff ..... 11
  - Alumni ..... 11
- The National Pupil Database (NPD) ..... 11**
- Storing student data ..... 12**
- What decisions can you make about your information? ..... 13**
  - Key Officers: ..... 13



# GDPR Privacy Notice

## 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 Staff, Students, Parents and our Alumni 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 holds about Staff, Students, Parents and our Alumni which identifies them and relates to them. This includes information such as;

### Students & Parents

- Name, Date of Birth and address, Examination results, medical details and behaviour records. We may also record your religion or ethnic group. Photos and video recordings of you are also personal information.

### Staff

- Personal information (such as name, employee or teacher number, national insurance number), Special categories of data including characteristics information such as gender, age, ethnic group. 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)

### Alumni

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

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

### Admissions

Reading School's Admissions Team supports parents with the school admissions process. The Secondary school Year 7 admissions process consists of several



# GDPR Privacy Notice

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.

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.

## How we use your personal information

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.

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

## 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:



# GDPR Privacy Notice

- 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

## 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 track the quality of our teaching and the learning that takes place at Reading School
- to assess the quality of our services
- 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)
- 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)
- 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



# GDPR Privacy Notice

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 will monitor student web browsing, the internet and mobile electronic devices e.g. iPads. 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).
- 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.



# GDPR Privacy Notice

- 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.
- 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 16-19 Bursary, so we can ensure students are provided with the financial assistance they need for educational visits or buying school books and items.

## 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

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.

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. DfE 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.
- We publish news on the website and put articles and photographs in the local news to inform the public about our activities.
- We will process financial information relating to staff for contractual reasons, pension returns etc.

## 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



# GDPR Privacy Notice

your current employment and professional qualifications, basic details of your time with us and information about your preferences and engagement with the programme.

## Our legal grounds for using information

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



## GDPR Privacy Notice

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.

### 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, 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.

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



## GDPR Privacy Notice

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

### 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.

### 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.

## 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



## GDPR Privacy Notice

- 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>.

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

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 \(www.gov.uk\)](http://www.gov.uk/national-pupil-database).

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

## Storing student data

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.



# GDPR Privacy Notice

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

### Key Officers:

- Mr Ashley Robson, Headmaster
- Mr Chris Evans, Deputy Headmaster and GDPR School Lead
- Miss Caroline Mole, Executive Assistant
- Data Protection Officer (DPO):  
Satswana, Pembroke House, St Christophers Place, Farnborough, Hampshire,  
GU14 0NH Tel: 01252 516898; Email: [info@satswana.co.uk](mailto:info@satswana.co.uk)

