READING BLUE COAT

School Privacy Notice

Who We Are

Reading Blue Coat School ("the School", a company limited by guarantee with company registration number 04243510) is the data controller, including for its wholly owned trading subsidiary Reading Blue Coat School (Trading) Limited (company registration number 04242660).

Both companies can be contacted at their trading and registered office address of Reading Blue Coat School, Holme Park, Sonning, Berkshire, RG4 6SU. This privacy notice is intended to cover both parties and their related activities, including the activities of the School's Foundation Office which cover alumni, community, fundraising and development activities. Sometimes the School will organise events and activities which are run under the banner of the Reading Old Blues Association ("ROBA"). The School is the data controller of your personal information in these cases as well.

The School also acts as data controller for the Reading Blue Coat and Archbishop Laud Charitable Trust, being an associated charity (Charitable Incorporated Organisation with company registration number CE002636 and charity number 1159943) whose activities and operations are conducted through the School and by School staff (with a separate Board of Trustees).

What This Privacy Notice Is For

This Privacy Notice is intended to provide information about how the School will use (or "process") personal data about individuals including:

- staff
- current, past and prospective students
- parents, carers or guardians (referred to in this policy as "parents").

Collectively, these individuals are referred to in this notice as the School's community.

This information is provided because Data Protection Law gives individuals the right to understand how their data is used. The School processes personal data regarding its community in accordance with the legal framework as set out in the following:

- UK General Data Protection Regulation ("GDPR")
- Data Protection Act 2018 ("DPA")
- Privacy and Electronic Communications Regulations ("PECR")
- Data Use and Access Act 2025 ("DUAA").

Staff, parents and students are all encouraged to read this Privacy Notice and understand the School's obligations to its entire community. The School has separate Data Protection and GDPR Retention Policies (which are available to members of the School's community)

This Privacy Notice applies:

- alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form.
- in addition to the School's other relevant terms and conditions and policies, including:
    - any contract between the School and its staff, or parents of students;
    - any policies or notices applicable to staff concerning the handling of personal data;
    - the School's *Security, CCTV and Access Control Policy*;
    - the School's *GDPR Retention Policy*;
    - the School's safeguarding, pastoral, or health and safety policies covering the photographing of children and how concerns or incidents are recorded;
    - the School's *Acceptable Use Policy* and its-*E-Safety, Digital Communications, and Student Device Policy*;
    - the School's *AI Policy and its Use of Generative AI In Academic Work Policy*.

Anyone who works for, or acts on behalf of, the School (including staff, volunteers, governors and service providers) will be subject to suitable training and/or policies commensurate with their role.

Responsibility For Data Protection

The School is registered with the Information Commissioner's Office (ICO) as a Data Controller and is responsible for what personal data is collected and how it is used. The School's ICO registration number is Z5792028.

The School has appointed the Bursar as its Data Protection Co-ordinator who will deal with all requests and enquiries concerning the School's use of personal data (see section on "Rights Under Legislation" below) and who will endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law.

The Bursar can be contacted at:

E: Bursar@rbcs.org.uk

T: 0118 933 5808

Mail: Reading Blue Coat School, Holme Park, Sonning, Berkshire, RG4 6SU

Why The School Needs to Process Personal Data

In order to fulfil its contractual and legal obligations and carry out its ordinary duties to staff, students and parents, the School needs to process a wide range of personal data about individuals (including current, past and prospective staff, students or parents) as part of its daily operation. It should be noted that compliance with a legal obligation and compliance with a contractual obligation are separate legal basis under Data Protection law.

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.

The School expects that the following uses will fall within that category of its (or its community's) "legitimate interests":

- For the purposes of student selection, to confirm the identity of prospective students and their parents, and retain a record if appropriate for the purposes of future applications or openings;
- To provide education services, including musical education, physical training or spiritual development, career services, and extra-curricular activities to students, and monitoring students' progress and educational needs, including where such services are provided remotely (either temporarily or permanently)
- To look after the welfare and development of the School's staff.

- Maintaining relationships with alumni and the School community, including direct marketing or fundraising activity (subject to the provisions of the PECR and the DUAA);
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- 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 and current students, including relating to outstanding fees or payment history, to/from any educational institution that the student attended or where it is proposed they attend; and to provide references to potential employers of past students;
- To enable students to take part in national or other assessments, and to publish the results of public examinations or other achievements of students of the School;
- To safeguard students' health and welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's *Acceptable Use Policy*;
- To make use of photographic images of students in School publications, on the School website and (where appropriate) on the School's social media channels in accordance with the School's policies on safeguarding, pastoral, or health and safety;
- For security purposes, including CCTV in accordance with the School's *Security, CCTV and Access Control Policy*;
- For the purposes of scientific research (for example, tracking student progress and performance, evaluating teaching methods, and engaging students in data driven science projects.);
- For regulatory record keeping/compliance purposes in respect of immigration requirements, as an employer and/or visa sponsor;
- To carry out or cooperate with any School or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.

The School will, on occasion need to process special category personal data (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law (UK GDPR as updated by the DUAA (2025)), including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons will include:

- To safeguard students' welfare and provide appropriate pastoral care,
- To take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so, for example:
    - for medical advice
    - for social protection, safeguarding, and cooperation with police or social services
    - for insurance purposes
    - To caterers or organisers of School trips who need to be made aware of dietary or medical needs;
- To comply with public health requirements and sharing this information with relevant health authorities;
- To provide educational services in the context of any special educational needs of a student;

- To provide spiritual education in the context of any religious beliefs;
- In connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans;
- To run any of its systems that operate on biometric data, such as for security and other forms of student identification (lunches etc.);
- As part of an internal or external complaint, disciplinary or investigation process that involves such data, for example if there are SEND, health or safeguarding elements;
- For legal and regulatory purposes (for example, child protection, diversity monitoring, health and safety and immigration / visa sponsorship compliance).

Consent

Where the School is relying on consent as a means to process personal data, any person may withdraw this consent at any time.

Please be aware however that the School may not be relying on consent but have another lawful reason to process the personal data in question even without consent being given, for example, compliance with a legal obligation or where it's in our legitimate interests as explained above.

That reason will usually have been asserted under this Privacy Notice or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because a purchase of goods, services or membership of an organisation such as an alumni or parents' association has been requested).

Types Of Personal Data Processed By The School

This will include:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- biometric information, which will be collected and used by the School in accordance with the School's *Biometrics Policy*;
- bank details and other financial information, e.g. about parents (or others) who pay fees to the School, and any anti-money laundering information we are required to collect by Law;
- past, present and prospective students' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- Staff financial information, such as, bank details, salary and pension details, for the proper and lawful processing of payroll;
- Gift Aid declaration information, where relevant;
- 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;
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- references given or received by the School about students, and relevant information provided by previous educational establishments and/or other professionals or organisations working with students;
- correspondence with and concerning staff, students and parents (past and present); and
- images of students (and occasionally other individuals) engaging in School activities, and images captured by the School's CCTV system (in accordance with the School's *Security CCTV and Access Control Policy*).

How The School Collects Data

The School generally receives personal data from an individual directly (including, in the case of students, from their parents). This may be via a form, or in the ordinary course of verbal or written communication (such as emails or written assessments).

In some cases personal data will be supplied by third parties (for example, another School, or other professionals or authorities working with that individual); or collected from publicly available resources.

Access and Sharing of Personal Data

Processing by third parties

Primarily, personal data collected by the School will remain within the School and will be processed by appropriate individuals in accordance with access protocols. However, where functions are outsourced (including e.g. payroll, cloud storage etc.) in accordance with Data Protection Law (including updates as per the DUAA), this type of external data processing is always subject to contractual assurances that personal data will be kept securely and used in accordance with the School's specific directions.

Data sharing. Occasionally, the School – including its trustees / governing board – will need to share personal information relating to its community of staff, students and parents with third parties, such as:

- any Parent Association;
- appropriate contractors, such as supply teachers and visiting teachers;
- professional advisers (e.g. lawyers, insurers, PR advisers and auditors, accountants);
- examination boards;
- sporting bodies;
- a Stage 3 complaints panel, which will include independent panel members, in accordance with the School's *Complaints Policy*;
- third parties and their advisers in the event of a possible or actual sale, merger or other restructuring of the School; and
- government authorities (e.g. HMRC, DfE, CAFCASS, police, Home Office, a relevant public health / NHS body and / or local authority) and/or appropriate regulatory bodies e.g. the Teaching Regulation Agency, the Independent Schools Inspectorate, the Charity Commission etc.

Access to Sensitive Data

Strict rules of access apply in the context of "special category" data, most notably:

- medical records; and
- pastoral or safeguarding files.

Medical data.

The School needs to process such information to comply with statutory duties and to keep students and others safe. Only authorised staff can access information on a need-to-know basis. This may include wider dissemination if needed for School trips or for catering purposes. Express consent will be sought where appropriate.

However, a certain amount of any SEND student's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the student requires.

Safeguarding data

Staff, students and parents are reminded that the School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education ("KCSIE")) to record or report incidents and concerns that arise or are reported to it (in some cases regardless of whether they are proven), if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, low-level concerns records kept about adults, and in some cases referrals to relevant authorities such as the LADO or police.

KCSIE also requires that, whenever a child leaves the School to join another School or college, their child protection file is promptly provided to the new organisation. The School will retain a copy in accordance with its retention policy for material related to safeguarding matters.

For further information about this, please view the School's *Child Protection & Safeguarding Policy* .

How Long We Keep Personal Data

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary staff and student personnel files is up to seven years following departure from the School. However, incident reports and safeguarding files will need to be kept much longer, in accordance with legal requirements.

Please contact the Bursar in relation to queries regarding the School's application of its retention policy or regarding requests for data erasure.

However, it should be noted that the School will often have lawful and necessary reasons to hold on to some personal data even following such request.

Following a request for data deletion the School will maintain a basic suppression record in order to uphold wishes in the future.

For further information about this, please refer to the School's *GDPR Retention Policy*.

Keeping In Touch And Supporting The School

The School will use the contact details of parents, alumni and other members of the School community to keep them updated (by sending out updates and newsletters via e mail and/or post) about activities/events within the School . Unless the relevant individual objects, the School will also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the School community, such as the Foundation Office and the Reading Old Blues Association ("ROBA");
- Contact parents and/or alumni (including via the organisations above) by post and email in order to promote and raise funds for the School and, where appropriate, other worthy causes subject to the provisions of the PECR);
- Collect information from publicly available sources about parents' and former students' occupation and activities, in order to maximise the School's fundraising potential.

Objections to any such data use, or requests for further information should be made in writing to the Bursar or Foundation Director. Where previously given, consent may be withdrawn and objections to marketing and/or fundraising may be raised however please see the above in relation to suppression records.

Rights under Legislation

The following rights apply to the School's community under applicable data protection legislation:

- **Right of Access**: To obtain confirmation as to whether personal data is being processed and, where that is the case, to access such personal data and receive copies thereof (see "Rights of Access" below).

- **Right to Rectification**: To require the correction of any inaccurate personal data and the completion of incomplete data without undue delay (see "Rights to Rectification" below).
- **Right to Erasure ("right to be forgotten")**: To request the erasure of personal data under specific circumstances prescribed by law, including where the data is no longer necessary for the purposes for which it was collected (see "Right to Erasure" below).
- **Right to Restrict Processing**: To request the restriction of processing of personal data in accordance with statutory provisions. Where processing is based on consent, such consent may be withdrawn at any time without affecting the lawfulness of processing carried out prior to withdrawal.
- **Right to Data Portability**: To receive personal data, which the School holds, in a pre-prescribed format. This could be with the view to transmitting this data onto another data controller.
- **Right to Object**: To object, on grounds relating to a particular situation, to the processing of personal data where such processing adversely affects rights and freedoms.

Please note that the above rights are not absolute, and requests may be refused where exceptions apply. The School will endeavour to respond to any such requests as soon as is reasonably practicable, and within the statutory time-limit of one month. However, fulfilling more complex or multiple requests, for example those involving third party information, may take longer.

Rights of access – Subject Access Requests and Data Subject Access Requests ("SARs" and "DSARs")

Requests by or on behalf of students

Students can make DSARs for their own personal data, provided that, they have sufficient maturity to understand the request they are making (see "Whose Rights?" below). A student of any age may ask a parent or other representative to make a DSAR on their behalf.

While a person with parental responsibility will generally be entitled to make a DSAR on behalf of younger students, the law still considers the information in question to be the child's. For older students, the parent making the request may need to evidence their child's authority for the specific request. Requests not considered in the child's best interests may be refused.

Students at Senior School are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home.

Parental requests

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

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

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

The School will be able to respond more quickly to smaller, targeted requests for information made during term time. If the request for information is deemed excessive or similar to previous requests, the School may:

- ask that the request be reconsidered,
- require a reasonable fee for the administrative costs of complying with the request,

- in certain cases refuse the request (but only where Data Protection Law allows it, and in accordance with relevant regulatory guidance).

Requests that cannot be fulfilled

GDPR rights (including the right of access) are limited to personal data, and certain data is exempt. This will include information:

- which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – (please see further below),
- which is subject to legal privilege (for example legal advice given to or sought by the School, or documents prepared in connection with a legal action, or where a duty of confidence is owed by a legal adviser).

The School is not required to disclose any student examination scripts (or other information consisting solely of student test answers, potentially including in mock exam scripts or other types of exams / tests used to assess performance. Markers' comments may still be disclosable if they constitute student personal data. The School is also not required to provide examination or other test marks ahead of their ordinary publication date, nor share any confidential reference held by the School that was (or will be) given for the purposes of the education, training, appointment or employment of any individual. This will also apply in the context of teacher assessed grades, in the absence of formal public examinations.

These exemptions necessarily apply also in the context of teacher-assessed grades, where required in the absence of formal public examinations due to pandemic conditions.

Right to Rectification

Please contact the Bursar if it is felt that the personal data the School holds is inaccurate. However, the School will not necessarily delete or amend views, opinions, notes or records purely on the request of an individual who disputes the account. Furthermore, records may be kept of all parties' viewpoints.

Right to Erasure

Under the "right to be forgotten" principle, a request can be made to delete personal data under specific circumstances such as:

- The data is no longer needed
- Consent has been withdrawn
- The data was unlawfully processed
- A legal obligation to erase it

This right is not absolute however and there will be reasons that the request may be refused for example when the data is required for the following reasons:

- a legal proceeding
- compliance with a legal obligation
- public health reasons
- scientific research which is in the public interest
- freedom of expression and information.

Generally, if the School still considers the processing of the personal data to be reasonably necessary, it is entitled to continue. All such requests will be considered on their own merits.

Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates. However, the School will often rely on parental authority or notice for the necessary ways it processes personal data relating to students – for example, under the parent contract, or via a form. Parents and students should be aware that this is not necessarily the same as the School relying on strict consent (see section on Consent above).

Where consent is required, it may in some cases be necessary or appropriate – given the nature of the processing in question, and the student's age and understanding – to seek the student's consent, either alongside or in place of parental consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

In general, the School will assume that students' consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the student's activities, progress and behaviour, and in the interests of the student's welfare. That is unless, in the School's opinion, there is a good reason to do otherwise.

However, where a student seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the School may be under an obligation to maintain confidentiality unless, in the School's opinion, there is a good reason to do otherwise; for example where the School believes disclosure will be in the best interests of the student or other students, or if required by law.

Students are required to respect the personal data and privacy of others, and to comply with the School's *Acceptable Use Policy* and the School rules. Staff are under professional duties to do the same covered under the relevant staff policy.

Data Accuracy And Security

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the following people of any significant changes to important information, such as contact details, held about them:

Students: Admissions (admissions@rbcs.org.uk)

Staff: Head of Human Resources (HR@rbcs.org.uk)

Alumini/Community: The Foundation Director (foundation@rbcs.org.uk)

Other: The Bursar (bursar@rbcs.org.uk)

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the School may need to process your data, and of who you may contact if you disagree.

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to School systems. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

This Policy

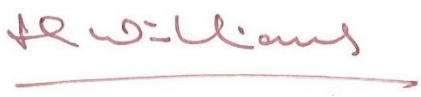
The School will update this Privacy Notice from time to time. Any substantial changes that affect an individual's rights will be provided directly as far as is reasonably practicable.

Queries And Complaints

Any comments or queries on this policy should be directed to the Bursar using the contact details provided above.

If an individual believes that the School has not complied with this data policy or acted otherwise than in accordance with Data Protection Law, they should write to the Bursar at bursar@rbcs.org.uk detailing their complaint. We will acknowledge all such data complaints without undue delay and will provide you with a formal written response within 30 calendar days of receiving the complaint. The response will be signed off by the Bursar and will detail any actions taken and how the complaint will be resolved.

You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.

Author(s):	Alexandra West (Bursar)
Date:	December 2025
Review Frequency:	Annually
Next Review Date:	November 2026
Agreed by:	 Howard Williams (Chair of Governors) *on behalf of the Full Governing Board*
Date of Agreement:	December 2025

Audit and Measurement Criteria		
Annually this privacy policy will be reviewed in line with updated legislation and revised as required.		
No	**Action**	**Frequency**
1	Review changes to UK GDPR and Data Protection Laws	Annually

Document Consultees	
Name	**Title**
Alexandra West	Bursar
Barry Hines	Head of IT

Associated/Linked/Related Documents			
Ref.	**Name**	**Type**	**Location/Link**
	GDPR Retention Policy	Policy	Reading Blue Coat School
	Data Protection Policy	Policy	Reading Blue Coat School
	Data Use and Access Act (June 2025)	Law	Data (Use and Access) Act 2025
	UK GDPR and the Data Protection Act 2018	Law	Data protection: The UK's data protection legislation - GOV.UK
	Keeping Children Safe in Education	Law	Keeping children safe in education 2025
	Data Complaints online form	Form	Upon Request from Bursar

Document History				
Version	**Updates**	**Owner**	**Author**	**Date**
1.	Original Policy	H Williams	T Tabrah	March 2024
2.	Annual amendment and review of policy in line with changes as per the DUAA (June 2025)	H Williams	A West	December 2025