



Privacy Notice for the Foundation Office

1. Introduction

Reed's School is a registered educational charity based in Cobham, charity number 312008. For the purposes of the Data Protection Law, Reed's School (the School) is a data controller.

This privacy notice applies to personal data held and used ("processed") by the Foundation Office at Reed's School about current, prospective and past Foundationers and their parents, carers or guardians (referred to in this policy as "parents").

We are committed to protecting your personal information and being transparent about the information we hold and how we will use it. This privacy notice sets out how the Foundation Office and the School use the information that you provide during the Foundation application process and if successful, the subsequent annual reviews.

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 a paper form. This privacy notice should also be read in conjunction with the School's Privacy Notice for Pupils and Parents, which explains how the School uses the personal data for pupils and parents more generally.

2. The types of personal data we process

In the course of a Foundation application or an annual Foundation place review, we collect various personal information, much of which, we appreciate is sensitive personal data. The types of information which we may collect, by way of example, include:

- Names and basic details of the prospective Foundation pupil and their family members;
- Addresses and contact information;
- Information relating to the family's financial situation; and
- Background information of the social situation and relevant history of the family, such as health information, social services and court orders where relevant.

The personal information is mostly collected directly from you when you complete a Foundation Application or an annual review, and in the supporting documentation. We also collect information from our home visits and from third party agencies if relevant.

3. How the data is used and the lawful bases for processing

As Foundation places at Reed's Schools are awarded on a basis of financial and social need, the information collected is essential to the application process and therefore it falls within our legitimate interests. We would not be able to process an application for a Foundation place without this information.

We will use the information for the following purposes:

- To administer and manage a Foundation application or place.
- To determine the level of support that can be offered; and
- To appropriately support Foundation pupils at the School.

4. Who has access to the personal data and who the School shares it with

Information related to the Foundation application and review processes is very tightly controlled due to its sensitive nature. Within the School, only a small number of people have access to the full details; the Headmaster, the Bursar, the Foundation team and the Foundation committee.

During an application for a Foundation place, we may also share the information that you provide, with other charitable trusts to ascertain if we can seek financial help to support the cost of school fees. This sharing of information is initially done anonymously, with identifying personal information removed.

If the initial application is successful the School may request that the parent/applicant complete and submit further forms and documentation for submission to other charitable trusts. Any information shared with other charitable trusts is sent in a secure manner and we are working with these trusts to confirm that they too protect personal information in line with current data protection law.

Once an application is successful and the child becomes a Foundationer at the School, a restricted amount of information regarding the pupil's circumstances and family background may be shared with appropriate members of the pastoral, medical and boarding team.

5. 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 pupil files is until that pupil has reached the age of 25, and that would include information relating to Foundation pupils. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

Information that relates to Foundation applications that are not successful or progressed will be reduced and a core record kept for a more limited amount of time, usually until that applicant could no longer attend the School.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Foundation Office at foundationoffice@reeds.surrey.sch.uk. However, please bear in mind that the School may have lawful and necessary reasons to hold on to some personal data even following such request. A limited and reasonable amount of information will be kept for archiving purposes.

6. How we store and protect your data

We take appropriate technical and organisational steps to protect the personal data about individuals, including policies around the use of technology and devices, and limited access to systems. All staff of the Foundation Office are aware of this policy and their duties under Data Protection Law and receive relevant training.

7. Your rights

Individuals have various rights under Data Protection Law to access and understand personal data held about them, to ask for it to be erased, amended or have it transferred to others, or to ask us to stop processing it.

You have a right to object at any time to the Foundation Office processing your personal data for any or all of the purposes described in this privacy notice. However, this would likely mean that we would not be able to process your application for a Foundation place.

To update information that we hold, please contact the Foundation Office at foundationoffice@reeds.surrey.sch.uk.

To exercise any of your other rights, the right of access or to have data erased, please contact the Foundation Office by email at foundationoffice@reeds.surrey.sch.uk.

There are various limitations and exemptions to these rights, as follows.

- The right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals or information which is subject to legal privilege.
- We will sometimes have compelling reasons to refuse specific requests to delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice.

All requests will be considered carefully on a case by case basis.

8. This policy

The Foundation Office will update this privacy notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable. Minor changes will be made as needed, with the latest version always being available in the Foundation Section on the Reed's School website.

9. Contact and complaints

If you have any queries about this privacy notice or how we process your personal data, please contact the Foundation Office at foundationoffice@reeds.surrey.sch.uk.

Reed's School has also appointed a Privacy Officer who will use their reasonable endeavours to ensure that all personal data is processed in compliance with this policy and Data Protection Law. If you are not satisfied with how we are processing your personal data, please notify the Privacy Officer, at privacyofficer@reeds.surrey.sch.uk. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns/>, although the ICO recommends that steps are taken to resolve the matter with the School before involving them.

Compiled by: Privacy Officer	Revision Number: 1 (Summer Term 2018)
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