

# Parent and Pupil Privacy Notice



COOMBE HOUSE  
SCHOOL

<b>Notice owner:</b>	Quality Assurance Officer	<b>Adoption Date:</b> June 2023
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Dorset  
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Excellence

## Contents

1. The purpose of this notice .....	3
2. Identity and contact details of the data controller .....	3
3. Contact details of the senior responsible individual (SRI) .....	3
4. Categories of pupil and parent / carer information that we collect and process .....	4
5. Why we collect and use pupil information .....	9
6. Collecting and storing pupil information .....	10
7. Who we share pupil information with .....	10
8. Why we regularly share pupil information` .....	10
9. Youth support services.....	11
10. Department for Education (DfE) .....	11
11. Closed Circuit Television (CCTV) .....	12
12. Requesting access to your personal data .....	12
13. The right to object.....	13
14. The right to withdraw consent.....	13
15. The right to lodge a complaint.....	13
16. How long will we hold information for .....	14
17. How Government uses your data .....	14
18. Data collection requirements .....	14
19. The National Pupil Database (NPD) .....	14
20. Sharing by the Department for Education (DfE) .....	14
21. How to find out what personal information the DfE holds about you .....	15
22. Contact Us.....	15
23. Updates to this privacy notice .....	15
24. Version control.....	15

## **1. The purpose of this notice**

The purpose of this notice is to provide you with information about how and why we process pupil and parent/carer information. It is also intended to provide you with other information which is required under the UK General Data Protection Regulation (GDPR). It is a legal requirement that we are transparent about how we process pupil and parent/carer information. We are the controller of the personal data we process. This means that we are responsible for deciding how we collect, use and store information about you.

## **2. Identity and contact details of the data controller**

The data controller responsible in accordance with the purposes of the UK General Data Protection Regulation (UK GDPR) and other data protection regulations is:

Dorset Centre of Excellence Limited  
Donhead St Mary  
Shaftesbury  
SP7 9LP

Telephone: 01747 449 844

Email: [office@dorsetcentreofexcellence.org.uk](mailto:office@dorsetcentreofexcellence.org.uk)

[www.dorsetcentreofexcellence.org.uk](http://www.dorsetcentreofexcellence.org.uk)

[www.coombehouseschool.org.uk](http://www.coombehouseschool.org.uk)

We are registered with the Information Commissioner's Office (ICO) under number: ZB244508.

## **3. Contact details of the senior responsible individual (SRI)**

The contact details of the senior responsible individual (SRI) for the Company are listed below:

Managing Director  
Dorset Centre of Excellence Limited  
Donhead St Mary  
Shaftesbury  
SP7 9LP

Email: [dpo@dorsetcentreofexcellence.org.uk](mailto:dpo@dorsetcentreofexcellence.org.uk)

The Company's Quality Assurance Officer is responsible for overseeing the implementation of this notice, monitoring our compliance with data protection law, and developing related procedures and guidelines where applicable. They are also the first point of contact for individuals whose data the company processes, and for the ICO.

#### 4. Categories of pupil and parent / carer information that we collect and process

We collect and process the following categories of pupil and parent / carer information in order to provide an education to the pupils at Coombe House School:

- pupil names, unique pupil numbers, contact details and preferences (including parent(s)/carer(s) details), national insurance number and identification documents
- characteristics such as ethnicity, religion, language, nationality, country of birth and free school meal eligibility
- previous school/provision information (including previous/current address whilst there)
- safeguarding information including court orders and professional involvement
- special educational needs information (including pupil and parental personal views)
- medical information including dietary requirements
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment information
- behavioural information (such as exclusions and any relevant alternative provision put in place) including online behaviour
- records of therapy sessions
- records of where pupils go after they leave us
- photographs / recorded images
- CCTV images captured on the school grounds (cameras are turned away from the school buildings)

#### I am a pupil

Purpose your data is used	Type of data used	Legal basis	How long we keep your data
To process your admission to the School.	<ul style="list-style-type: none"> <li>• Name</li> <li>• Unique pupil number</li> <li>• Contact details and preferences</li> <li>• National Insurance number</li> <li>• Identification documents</li> <li>• Ethnicity</li> <li>• Religion</li> <li>• Language</li> <li>• Nationality</li> <li>• Country of birth</li> <li>• Free school meal eligibility</li> <li>• Previous school/provision</li> <li>• Safeguarding information</li> </ul>	UK GDPR Article 6 (e) - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (the school) and  UK GDPR Article 9 (g) – reasons of substantial public interest (with a basis in law).	To be kept whilst you are a pupil at the school.  Your file will be transferred to your next education provider or if this is your last provider, then for 25 years from your date of birth.  Your educational health care plan (EHCP) is kept from your date of birth + 31 years.

	<ul style="list-style-type: none"> <li>• Special educational needs</li> <li>• Medical information</li> <li>• Dietary information</li> </ul>		Other information not included in your educational record, is kept for different retention periods. Please contact the school for further details.
To care for your wellbeing whilst you are at the school, including safeguarding.	<ul style="list-style-type: none"> <li>• Safeguarding information</li> <li>• Behaviour information</li> <li>• Special educational needs information</li> <li>• Medical information</li> <li>• Dietary information</li> <li>• CCTV images</li> <li>• Records of therapy sessions</li> </ul>	<p>UK GDPR Article 6 (e) - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (the school) and</p> <p>UK GDPR Article 9 (g) - reasons of substantial public interest (with a basis in law).</p>	<p>To be kept whilst you are a pupil at the school.</p> <p>Your file will be transferred to your next education provider or if this is your last provider, then for 25 years from your date of birth.</p> <p>Your educational health care plan (EHCP) is kept from your date of birth + 31 years.</p> <p>Other information not included in your educational record, is kept for different retention periods. Please contact the school for further details.</p>
To monitor and report on your progress whilst at the school.	<ul style="list-style-type: none"> <li>• Assessment and exam data including grades awarded</li> <li>• Photographs and recorded images of your learning and progress.</li> </ul>	<p>UK GDPR Article 6 (e) - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (the school)</p>	<p>To be kept whilst you are a pupil at the school.</p> <p>Your file will be transferred to your next education provider or if this is your last provider, then for</p>

			25 years from your date of birth.
			Other information not included in your educational record, is kept for different retention periods. Please contact the school for further details.
To support your learning whilst you are at the school.	<ul style="list-style-type: none"> <li>• Attendance data</li> <li>• Behaviour information</li> <li>• Special educational needs information</li> </ul>	<p>UK GDPR Article 6 (e) - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (the school) and</p> <p>UK GDPR Article 9 (g) - reasons of substantial public interest (with a basis in law).</p>	<p>To be kept whilst you are a pupil at the school.</p> <p>Your file will be transferred to your next education provider or if this is your last provider, then for 25 years from your date of birth.</p> <p>Your educational health care plan (EHCP) is kept from your date of birth + 31 years.</p> <p>Other information not included in your educational record, is kept for different retention periods. Please contact the school for further details.</p>
For the school to assess the quality of the education provided to you.	<ul style="list-style-type: none"> <li>• Attendance data</li> <li>• Assessment and exam data including grades awarded</li> <li>• Photographs and recorded images of your learning and progress</li> </ul>	<p>UK GDPR Article 6 (e) - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (the school).</p>	<p>To be kept whilst you are a pupil at the school.</p> <p>Your file will be transferred to your next education provider or if this is your last</p>

	<ul style="list-style-type: none"> <li>Records of where you go after leaving the school</li> </ul>	<p>provider, then for 25 years from your date of birth.</p> <p>Other information not included in your educational record, is kept for different retention periods. Please contact the school for further details.</p>
For communication, marketing and promotional purposes.	<ul style="list-style-type: none"> <li>Photographs and recorded images</li> </ul>	<p>UK GDPR Article 6 (a) – We have your (or your parent/carer) consent to take your photograph/recorded images.</p> <p>The consent will end when you leave the school or inform us of the withdrawal of consent.</p>

## I am a parent/carer

Purpose your data is used	Type of data used	Lawful basis	How long we keep your data
To process your child's admission to the school	<ul style="list-style-type: none"> <li>Contact details and preferences, including next of kin.</li> <li>Safeguarding information which could include court orders or professional involvement</li> <li>Special educational needs information for your child which includes parental/carer views</li> </ul>	<p>UK GDPR Article 6 (e) - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (the school) and</p> <p>UK GDPR Article 9 (g) – reasons of substantial public interest (with a basis in law).</p>	<p>To be kept whilst your child is a pupil at the school.</p> <p>Your child's file will be transferred to their next education provider or if this is their last provider, then for 25 years from their date of birth.</p> <p>Your child's educational health care plan (EHCP) is kept from their date of birth + 31 years.</p> <p>Other information not included in the educational record, is kept for different retention</p>

			periods. Please contact the school for further details.
To provide your child with an education, including caring for their wellbeing and safeguarding.	<ul style="list-style-type: none"> <li>• Contact details and preferences, including next of kin.</li> <li>• Safeguarding information which could include court orders or professional involvement</li> <li>• Special educational needs information for your child which includes parental/carer views</li> </ul>	<p>UK GDPR Article 6 (e) - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (the school) and</p> <p>UK GDPR Article 9 (g) – reasons of substantial public interest (with a basis in law).</p>	<p>To be kept whilst your child is a pupil at the school.</p> <p>Your child’s file will be transferred to their next education provider or if this is their last provider, then for 25 years from their date of birth.</p> <p>Your child’s educational health care plan (EHCP) is kept from their date of birth + 31 years.</p> <p>Other information not included in the educational record, is kept for different retention periods. Please contact the school for further details.</p>
To keep all children and young people safe whilst they attend Coombe House School.	<ul style="list-style-type: none"> <li>• CCTV images captured on school grounds</li> </ul>	<p>UK GDPR Article 6 (e) - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (the school).</p>	<p>A maximum of 31 days.</p>

The School may also receive information regarding pupils and their parent/carers from previous schools, the local authority or the Department for Education.



## 5. Why we collect and use pupil information

We collect and use pupil information, for the following purposes:

- to support our pupils' learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to keep pupils safe when learning online
- to assess the quality of our services
- for safeguarding purposes
- to comply with the law regarding data sharing
- administer admissions to the School
- for health and safety and insurance purposes

As a school, we are subject to a wide range of laws which we must comply with to further pupil education and to safeguard their wellbeing. To comply with these laws, we only process personal information as far as is necessary to meet those obligations. We also process some of the information described in this privacy notice to carry out the public tasks vested in us as a school in order to effectively run the school.

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some is provided on a voluntary basis. For example, the pupils dietary requirements or parental / carer consent to take photographs or recorded images of the pupils for promotional purposes. In order to comply with UK GDPR, we will inform you at the point of collection whether you are required to provide certain pupil information to us or if you have a choice in this. If we need your consent, the School will provide you with clear and detailed information as to why the School is collecting the data and how the data will be used. Where the School processes your data based on your consent, you have the right to withdraw this consent at any time.

The School collects and uses pupil information under the submission of the school census return, including a set of named pupil records, which is a statutory requirement of schools under Section 537A of the Education Act 1996. This complies with Article 6 and Article 9 of the GDPR which sets the lawful basis for the processing of the data.

Some of the reasons listed above overlap, and there may be several grounds which justify our use of this data.

### What do we mean by 'lawful basis'?

We are only able to use your personal data when the law allows us to. This is called lawful basis. Regarding the above purposes, the lawful basis listed for each are explained below:

#### UK GDPR Article 6 1(a) – Consent

If we require your consent to process your data, then the lawful basis is consent. For example, the use of pupil photographs and recorded images for promotional purposes.

#### UK GDPR Article 6 1(e) – Performance of a task in the public interest or in the exercise of official authority.

This is where it is necessary for us to hold and use your information for the purposes of providing schooling and so we can look after the pupils. This function is in the public interest because everybody needs to have an education.

## Special category data

Special category data is personal data that needs more protection because it is sensitive.

We may need to use the information about you which is special category data where there is a specific interest to do so, for example health and social care purposes (Article 9, 2i UK GDPR) or to provide you with equal opportunities and treatment (Article 9, 2g UK GDPR). We will also use this information where you have given us permission to do so (Article 9, 2a UK GDPR). There may also be circumstances where we need to use your information in relation to legal claims (Article 9, 2f UK GDPR), or to protect your vital interests and where you are unable to provide your consent (Article 9, 2c UK GDPR).

Some of the reasons listed above overlap, and there may be several grounds which justify our use of this data.

## **6. Collecting and storing pupil information**

We collect pupil information via new pupil request forms at the start of the academic year (or point of entry), through our Management Information System (Arbor) and secure file transfer via Egress from the pupils previous school. Alternatively, if secure file transfer via Egress is not available, then documents are sent to us via first class signed for post with confirmation of receipt shared with the previous school.

As part of the Education, Health and Care Plan (EHCP) process, we gather information via request forms which are sent to us by post.

We hold pupil data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please contact the School Office.

## **7. Who we share pupil information with**

The School routinely shares pupil information with:

- schools that pupils attend after leaving us
- our local authority
- youth support services (pupils aged 13+)
- the Department for Education (DfE)
- the NHS
- educators and examining bodies
- our regulator (Ofsted)
- suppliers and service providers (such as alternative provision)
- central and local government
- professionals and consultants (i.e. careers advice)

We will only share personal data when necessary, and will ensure that only the minimal amount of personal data is shared to fulfil the purpose of the sharing.

## **8. Why we regularly share pupil information`**

We do not share information about our pupils without consent unless the law and our policies allow us to do so. For further information on the sharing of safeguarding information, please refer to our [Safeguarding and Child Protection policy](#).

The sharing of information is done so securely via file transfer. If the receiver does not use this method of transfer, then any shared documents will be password protected.

## **9. Youth support services**

### **Pupils aged 13+**

Once our pupils reach the age of 13, we also pass pupil information to our local authority and/or provider of youth support services as they have responsibilities 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:

- Youth support services
- Careers advisers

The information shared is limited to the child's name, address and date of birth. However where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child/pupil once they reach the age of 16.

### **Pupils aged 16+**

We will also share certain information about pupils aged 16+ with our local authority and/or provider of youth support services as they have responsibilities 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:

- Post-16 education and training providers
- Youth support services
- Careers advisers

Data is securely transferred to the youth support services via file transfer using Egress. If the receiver does not use this method of transfer, then any shared documents will be password protected.

For more information about services for young people, please visit our local authority website.

## **10. Department for Education (DfE)**

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our pupils with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections, under:

Section 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

All data is transferred securely and held by the Department for Education (DfE) under a combination of software and hardware controls, which meet the current government security policy framework.

For more information, please see 'How Government uses your data' section.

### **11. Closed Circuit Television (CCTV)**

The Company uses closed circuit television (CCTV) images to reduce crime and to monitor buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to the property.

The coverage of the CCTV system is positioned away from the school buildings and restricted to the surrounding school grounds. It is not used inside any buildings, including classrooms and toilets.

For further information on our CCTV system and who the images may be shared with, please contact the School Office.

### **12. Requesting access to your personal data**

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, please contact the Quality Assurance Officer by email at: [dpo@dorsetcentreofexcellence.org.uk](mailto:dpo@dorsetcentreofexcellence.org.uk).

Personal data about a child belongs to that child, and not the child's parents or carers. For a parent or carer to make a subject access request with respect to their child, the child must either be unable to understand their rights and the implications of a subject access request, or have given their consent.

Children below the age of 12 are generally not regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of pupils at our school may be granted without the express permission of the pupil. This is not a rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

Children aged 12 and above are generally regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of pupils at our school may not be granted without the express permission of the pupil. This is not a rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

You have the right to:

- to ask us for access to information about you that we hold
- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics

- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

Your rights will differ depending on the lawful basis for the processing of your personal information. For further information on your rights, please refer to the ICO guidance <https://ico.org.uk/for-the-public>.

### **13. The right to object**

You have the right to object to us processing your personal information at any time. However, this will only apply in certain circumstances. You can object if we are using your data for the following:

- for a task carried out in the public interest;
- for the exercise of official authority;
- for our legitimate interests;
- for scientific or historical research, or statistical purposes; or
- for direct marketing purposes.

We cannot refuse your objection to using your personal data for direct marketing purposes. However, if you have objected to other uses of your personal data we can refuse to comply with your objection if we have a strong reason to continue processing your data. For further information on the right to object, please refer to the ICO guidance <https://ico.org.uk/for-the-public/the-right-to-object-to-the-use-of-your-data/>.

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>.

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

### **14. The right to withdraw consent**

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the School Office.

### **15. The right to lodge a complaint**

If you are unhappy with any aspect of this privacy notice, or how your personal data is being processed, please contact our Quality Assurance Office by email at [dpo@dorsetcentreofexcellence.org.uk](mailto:dpo@dorsetcentreofexcellence.org.uk).

If you are still not happy, you have the right to lodge a complaint with the Information Commissioner's Office (ICO). Their details are listed below:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## **16. How long will we hold information for**

We will hold pupil, parent and carer information for a period of time specified by law and as detailed within our Data Retention and Disposal procedure and guidance. The length of time will depend on the nature of the information held. Data is only stored for as long as necessary to complete the task for which it was originally collected.

For information on our Data Retention and Disposal procedure and guidance, please contact the School Office.

## **17. How Government uses your data**

The pupil data that we lawfully share with the Department for Education (DfE) through data collections:

- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school
- informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures)
- supports 'longer term' research and monitoring of educational policy

## **18. Data collection requirements**

To find out more information about the data collection requirements placed on us by the Department for Education (DfE) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

## **19. The National Pupil Database (NPD)**

Much of the data about pupils in England goes on to be held in the National Pupil Database (NPD).

The NPD is owned and managed by the Department for Education (DfE) and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department for Education (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 awarding bodies.

To find out more about NPD, go to: <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

## **20. Sharing by the Department for Education (DfE)**

The law allows the DfE to share pupils' personal data with certain third parties, including:

- schools and local authorities
- researchers
- organisations connected with promoting the education or wellbeing of children in England
- other government departments and agencies
- organisations fighting or identifying crime

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

Organisations fighting or identifying crime may use their legal powers to contact the DfE to request access to individual level information relevant to detecting that crime.

For information about which organisations the DfE has provided pupil information or to access a monthly breakdown of data share volumes with the Home Office and the Police please visit the following website: <https://www.gov.uk/government/publications/dfe-external-data-shares>.

## 21. How to find out what personal information the DfE holds about you

Under the terms of the Data Protection Act 2018, you are entitled to ask the DfE:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they are holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the DfE, you should make a 'subject access request' to them. Further information on how to do this can be found within the DfE's personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>.

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

## 22. Contact Us

If you would like to discuss anything in this privacy notice, please contact the Quality Assurance Officer by email at: [dpo@dorsetcentreofexcellence.org.uk](mailto:dpo@dorsetcentreofexcellence.org.uk).

## 23. Updates to this privacy notice

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated in April 2024.

## 24. Version control

Date of adoption of this notice, by or on behalf of the Proprietor	June 2023
Date of last review of this notice	April 2024
Date for next review of this notice	April 2025
Notice owner (Proprietor)	Dorset Centre of Excellence Limited