

Parent and Pupil Privacy Notice



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1. The purpose of this notice

The purpose of this notice is to provide information about how and why information about pupils and parents / carers is processed by Coombe House School (the School) and Dorset Centre of Excellence (the Company). It is also intended to provide other information that is required under the UK General Data Protection Regulation (GDPR). It is a legal requirement to be transparent about how information about pupils and parents / carers is processed.

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 449 820

Email: office@coombehouse.org.uk

www.dorsetcentreofexcellence.org.uk

www.coombehouseschool.org.uk

The Company is registered with the Information Commissioner's Office (ICO) under number: ZB244508.

As the controller of the personal data processed, the Company is responsible for deciding how information is collected, used and stored.

3. Contact details of the Senior Responsible Individual (SRI)

The contact details of the senior responsible individual (SRI) are as follows:

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

Email: dpo@coombehouse.org.uk

The Quality Assurance Lead is responsible for overseeing the implementation of this notice, monitoring compliance with data protection law, and developing related procedures and guidelines where applicable. The Governance and GDPR Lead is the first point of contact for individuals whose data the company processes, and for the ICO.

4. Categories of pupil and parent / carer information collected and processed

The Company collects and processes 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 (SEN) information (including pupil and parent / carer 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 the School.
- Photographs / recorded images (with parent / carer consent).
- CCTV images captured on the school grounds (cameras are turned away from the school buildings).

Pupils

Purpose data is used	Type of data used	Legal basis	How long we keep data
To process the admission to the School.	<ul style="list-style-type: none">• Name• Unique pupil number• Contact details and preferences• National Insurance number• Identification documents• Ethnicity• Religion• Language• Nationality• Country of birth• Free school meal eligibility• Previous school / provision• Safeguarding information• Special educational needs• Medical information• Dietary information	<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>UK GDPR Article 9 (g) – reasons of substantial public interest (with a basis in law).</p>	<p>To be kept whilst the pupil remains at the school.</p> <p>The file will be transferred to the next education provider or if this is the last provider, then for 25 years from the date of birth.</p> <p>Educational health care plan (EHCP) is kept from the pupil 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>

<p>To care for the pupils wellbeing whilst at the school, including safeguarding.</p>	<ul style="list-style-type: none"> • Safeguarding information • Behaviour information • Special educational needs information • Medical information • Dietary information • CCTV images • Records of therapy sessions 	<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>UK GDPR Article 9 (g) – reasons of substantial public interest (with a basis in law).</p>	<p>To be kept whilst a pupil at the school.</p> <p>The file will be transferred to the next education provider or if this is the last provider, then for 25 years from date of birth.</p> <p>Educational health care plan (EHCP) is kept from the pupil 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>
<p>To monitor and report on pupil progress whilst at the school.</p>	<ul style="list-style-type: none"> • Assessment and exam data including grades awarded • Photographs and recorded images of learning and progress. 	<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 a pupil at the school.</p> <p>The file will be transferred to the next education provider or if this is the last provider, then for 25 years from the pupil date of birth.</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 support learning whilst at the school.	<ul style="list-style-type: none"> • Attendance data • Behaviour information • Special educational needs information 	<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>UK GDPR Article 9 (g) – reasons of substantial public interest (with a basis in law).</p>	<p>To be kept whilst a pupil at the school.</p> <p>The file will be transferred to the next education provider or if this is the last provider, then for 25 years from the pupils date of birth.</p> <p>Educational health care plan (EHCP) is kept from the pupils 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>
For the school to assess the quality of the education provided.	<ul style="list-style-type: none"> • Attendance data • Assessment and exam data including grades awarded • Photographs and recorded images of learning and progress • Records of where the pupil goes after leaving the school 	<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 a pupil at the school.</p> <p>The file will be transferred to the next education provider or if this is the last provider, then for 25 years from the pupils date of birth.</p> <p>Other information not included in the educational record, is kept for different retention periods. Please contact the school for further details.</p>

For communication,
marketing and
promotional purposes.

- Photographs and recorded images

UK GDPR Article 6 (a) – consent
has been obtained to take
photographs / recorded images.

The consent will end upon the pupil
leaving the school or informing the
School or Company of the withdrawal
of consent.

Parents / Carers

Purpose the data is used	Type of data used	Lawful basis	How long we keep your data
To process admission to the school	<ul style="list-style-type: none"> Contact details and preferences, including next of kin. Safeguarding information which could include court orders or professional involvement Special educational needs information which includes parent / carer views 	<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 a pupil at the school.</p> <p>The file will be transferred to the next education provider or if this is the last provider, then for 25 years from the date of birth.</p> <p>Educational health care plan (EHCP) is kept from the pupils 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"> CCTV images captured on school grounds 	<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>

<p>To provide pupils with an education, including caring for their wellbeing and safeguarding.</p>	<ul style="list-style-type: none"> • Contact details and preferences, including next of kin. • Safeguarding information which could include court orders or professional involvement • Special educational needs information which includes parent / carer views 	<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 a pupil at the school.</p> <p>The file will be transferred to the next education provider or if this is the last provider, then for 25 years from the pupils date of birth.</p> <p>The educational health care plan (EHCP) is kept from the 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>
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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 the Company collects and uses pupil information

Information about pupils is collected and used, for the following purposes:

- To support 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 services provided.
- 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, there are a wide range of laws which must be complied with to further pupil education and to safeguard their wellbeing. To comply with these laws, personal information is only processed as far as is necessary to meet those obligations. Some of the information described in this privacy notice is also processed to carry out the public tasks vested in the school in order to effectively run the school.

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information provided is mandatory, some is provided on a voluntary basis. For example, pupils dietary requirements or parent / carer consent to take photographs or recorded images of the pupils for promotional purposes. In order to comply with UK GDPR, pupils or parents / carers will be informed at the point of collection whether certain pupil information is required to be provided or if there is a choice in this. If consent is needed, the School will provide clear and detailed information as to why the School is collecting the data and how the data will be used. Where the School processes data based on consent, pupils and parents / carers 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 the use of this data.

What is meant by 'lawful basis'?

Personal data is only able to be used when the law allows. 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 consent is required to process 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 to hold and use information for the purposes of providing schooling and to ensure pupils are looked after. 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.

Information which is special category data may need to be used where there is a specific interest to do so, for example health and social care purposes (Article 9, 2i UK GDPR) or to provide equal opportunities and treatment (Article 9, 2g UK GDPR). This information is also used where permission to do so has been given (Article 9, 2a UK GDPR). There may also be circumstances where information in relation to legal claims is needed to be used (Article 9, 2f UK GDPR), or to protect vital interests and where consent is unable to be provided (Article 9, 2c UK GDPR).

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

6. Collecting and storing pupil information

Pupil information is collected via new pupil request forms at the start of the academic year (or point of entry), through the Management Information System (Arbor) and secure file transfer via Egress from the pupil's previous school. Alternatively, if secure file transfer via Egress is not available, then documents are sent 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, information is gathered via request forms which are sent by post.

Pupil data is held securely for the set amount of time shown in the data retention schedule. For more information on the data retention schedule and how data is kept safe, please contact the School Office.

7. Who pupil information is shared with

The School routinely shares pupil information with:

- Schools that pupils attend after leaving.
- The local authority.
- Youth support services (pupils aged 13+).
- The Department for Education (DfE).
- The NHS.
- Educators and examining bodies.
- Regulators (such as Ofsted).
- Suppliers and service providers (such as alternative provision).
- Central and local government.
- Professionals and consultants (i.e. careers advice).

Personal data is only shared when necessary, and only the minimal amount of personal data is shared to fulfil the purpose of the sharing.

8. Why pupil information is regularly shared

Information about our pupils is not shared without consent unless the law and internal policies allow for this. For further information on the sharing of safeguarding information, please refer to the [Safeguarding and Child Protection Policy](#).

The sharing of information is done so securely via file transfer using Egress. 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 pupils reach the age of 13, pupil information is passed to the 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+

Certain information about pupils aged 16+ will be shared with the 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 the 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. The School is required to share information about pupils with the Department for Education (DfE) either directly or via the 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 the CCTV system and who the images may be shared with, please contact the School Office.

12. Requesting access to personal data

Under data protection legislation, parents and pupils have the right to request access to information about them that is held. To make a request for access to personal information, or to be given access to a child's educational record, please contact the Governance and GDPR Lead by email at: dpo@coombehouse.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 the 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 the 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.

Parents / Carers have the right to:

- Ask for access to personal information that is held
- Have personal data rectified, if it is inaccurate or incomplete.
- Request the deletion or removal of personal data where there is no compelling reason for its continued processing
- Restrict the processing of personal data (i.e. permitting its storage but no further processing).
- Object to direct marketing (including profiling) and processing for the purposes of scientific / historical research and statistics.
- Not be subjected to decisions based purely on automated processing where it produces a legal or similarly significant effect.

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

13. The right to object

Everyone has the right to object to the processing of personal information at any time. However, this will only apply in certain circumstances. Individuals can object if data is being used for the following:

- A task carried out in the public interest.
- The exercise of official authority.
- Legitimate interests.
- Scientific or historical research, or statistical purposes.
- Direct marketing purposes.

The Company cannot refuse an objection to using personal data for direct marketing purposes. However, if other uses of personal data has been objected to, refusal to comply with the objection can be made if there is a strong reason to continue processing the 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/>.

Where there are any concerns or complaints about the way personal data is collected or used, these should be raised with the Company in the first instance by email to dpo@coombehouse.org.uk 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

Everyone has the right to withdraw consent where personal data is processed with consent. To withdraw consent please contact the School Office.

15. The right to lodge a complaint

If any individuals are unhappy with any aspect of this privacy notice, or how personal data is being processed, please contact the Governance and GDPR Lead by email at dpo@coombehouse.org.uk

If the complainant is not satisfied with the response, then complainants 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 information be held for

Pupil, parent and carer information is held for a period of time specified by law and as detailed within the 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 the Data Retention and Disposal procedure and guidance, please contact the School Office.

17. How the Government uses data

The pupil data that is lawfully shared 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 by the Department for Education (DfE), please 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

Under the terms of the Data Protection Act 2018, everyone is entitled to ask the DfE:

- If they are processing personal data about them.
- For a description of the data they hold.
- The reasons they are holding it and any recipient it may be disclosed to.
- For a copy of the personal data and any details of its source

To see the personal data held by the DfE, a 'subject access request' should be submitted 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

To discuss anything in this privacy notice, please contact the Governance and GDPR Lead by email at: dpo@coombehouse.org.uk.

23. Updates to this privacy notice

This privacy notice may need to be updated periodically so it is recommended that this information be revisited from time to time. This version was last updated in April 2025.

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 2025
Date for next review of this notice	April 2026
Notice owner (Proprietor)	Dorset Centre of Excellence Limited