

Privacy notice for students at Coombe Wood School and their parents/carers

This document gives you detailed information about how we use your personal data and complies with the EU General Data Protection Regulations. The latest version is available on our web site.

Your privacy is critically important to us. We follow a few fundamental principles as to how we use data:

- We are thoughtful about the personal information that we ask you to provide.
- We carefully consider the ways that we use and store your personal information.
- We share your data only when we need to.
- We take steps to ensure that the organisations with whom we share your information understand that your privacy is critically important.
- We aim to store personal information for as long as we have a reason to keep it and not longer than this.
- We believe in full transparency on how we gather, use, and share your personal information.
- We never sell your personal data to anyone.

1 – Whose data do we process?

We process personal data relating to those who are registered students at our school, and their parents and carers. We may also receive data about students from a variety of sources including previous schools or colleges, local authority, external agencies such as hospitals, the Department for Education and the Learning Records Service.

2 - Why do we process your data?

As a school, we operate in the public interest to provide all of our students with an education, pastoral care and support for their next steps when they leave us. We are also required by law to share some information with the Department for Education (DfE). In order to safely and legally run the school and to meet our legal obligations to the DfE, it is necessary for us to store and process data about both students and their parents and carers. If we do not process this data:

- We may be unable to provide students with an education or pastoral care.
- We may be unable to keep parents and carers informed about students' education and support.
- We may be unable to enter students for external examinations or assessments.
- We may be unable to assess the quality of our services.
- We may be unable to meet legal obligations on us as a school or comply with the law regarding data-sharing.

In addition to this, we may contact all parents/carers to make a voluntary contribution towards funding of the school and have a legitimate interest in doing so. All voluntary contributions are used towards the running of the school to the benefit of all students. We also retain alumni details and our school buildings may include alumni photographs and "gold leaf" displays of past students' achievements. We have a legitimate interest in storing this data to help maintain and conserve the past history and culture of the school.

Your data is processed for the following reasons:

- Supporting and managing the learning needs of our students
- Providing appropriate pastoral care and meeting students' welfare needs
- Complying with requirements set by bodies which manage the awarding of external qualifications to our students (such as OFQUAL or individual examination boards)
- Monitoring and reporting on student progress
- Offering career guidance and access to training providers
- Enabling parents and carers to be kept informed about their children's education
- Assessing the quality of our services
- Administrating and running educational trips and visits
- Providing financial support in the form of bursaries to 6th form students
- Undertaking fundraising for the school through sending out CWS PA communications
- Maintaining accounts, running of the school and management of school property
- Complying with laws on data-sharing, safeguarding and children missing from education
- Ensuring security, preventing crime, behaviour management and incident investigation through the use of CCTV
- Providing supporting information for the application of Free School Meals and School Uniform Vouchers
- Enriching our culture and partnership with parents and celebrating achievements and events
- Managing catering services for all our students including handling dietary requirements and choices

- Contributing to a sense of belonging and developing an inclusive learning environment throughout the school site
- Marketing the school and Folio Education Trust online and in wider marketing materials

The data that we require about your child includes some sensitive data.

*Sensitive data that we **must** know about*

- You **must** tell us about a student’s health or medical conditions.
- As a school, we operate in the public interest to educate children. We must provide the right level of care and support for all of our students. We would be unable to keep children safe without processing some essential health-related information to enable us to do that.
- If we were unable to store or process this information, we would be unable to meet the learning or welfare needs of our students.

*Sensitive data that you **do not have to share** with us*

- Some sensitive data is shared with us **optionally** e.g. ethnicity. This data is held and processed only because both student and parent or carer have consented and agreed to share this data with us.
- You do not have to share this with us. You can change your preference at any time by contacting the school. You can also request for this to be deleted and in doing so, this will not affect our ability to provide your child with an education.

3 – What data do we process about students and families?

The personal data that we hold and process may include:

- Personal details, including names, date of birth, home address, parents and carers contact details, student photographs, passport numbers and unique learner numbers
- Personal characteristics (such as ethnic group, religion, country of birth, language, free-school meal eligibility, looked-after status)
- Information relating to National Curriculum assessment
- Attendance and absence information
- Pastoral welfare, behaviour commendations, disciplinary incidents and exclusions information within our school (and any similar information received from previous school files)
- Leavers’ destinations and alumni contact details
- Biometric data in the form of a numerical code that represents each student’s fingerprint¹
- Photographic, audio or video material of students (where required for student assessment)
- Child protection and safeguarding
- Details of special educational needs and disabilities including education, health and care plans, medical impairments, social, emotional and mental health needs
- Dietary requirements and choices
- Health and safety information relating to accidents or incidents involving our students

4 – How do we share your data?

Information sharing takes place on a routine basis as part of our usual school processes.

- The first table below summarises how data may be shared with third parties, including which data is shared and why it is shared.
- In exceptional or extraordinary circumstances, there may be cases where additional information is shared about a particular student and these are detailed in the second table.

TABLE 1 - ROUTINE SHARING

Who Data is Shared With	What Data is Shared	Reason for Sharing
Local authority – School admissions	Student name, date of birth, home address, parent or carer details, school application reference number and unique pupil number, EHCP and SEND information	To administrate school admissions
Local authority - Youth support service	Student name, address, date of birth, names and addresses of parents and carers	To meet legal requirements. Parents can request sharing is restricted to student’s name, address and DOB.
Local authority – Health & safety Department	Student name, date of birth, home address, parent or carer telephone details	To track incidents where an accident form was completed after a health and safety incident involving a student or member of staff
Local authority – Education department	Student name, date of birth, address, date of leaving and destination, attendance marks, exclusion period and reason and parent or	To comply with legal obligation on the school to share information with local authority in respect of safeguarding, promoting welfare and reporting

¹ Please refer to more detailed information on biometric data available on pages 7-8 of this Privacy Notice.

Who Data is Shared With	What Data is Shared	Reason for Sharing
	carer telephone details	children missing from education
Learning records service	Student name, date of birth, address	To obtain unique learner numbers (UPN/ULN)s which are a means of uniquely identifying each child
Department for Education (DfE) - census	All census data fields as listed in Department for Education (DfE) document "School census 2017 to 2018" pp. 33-38 ²	<p>We are required to provide information about you to the DfE as part of data collections such as the school census. Under the Education Act 1996, the DfE requires all schools to submit data about all students and the school staff as part of a termly census.</p> <p>Some of this information is then stored in the DfE's National Pupil Database, which provides evidence on how schools are performing. This, in turn, supports research. The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.</p> <p>The Department for Education may share information from the database with other organisations which promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.</p>
Careers guidance provider	Student name, email address, action plan	To provide career guidance to students
Examination boards	Student name, date of birth, special educational needs and/or personal circumstances which may affect exam performance; audio and/or visual images or recordings where they are required for assessment in a particular subject.	To assess the students' progress and attainment in external examinations
Other schools when a student transfers	A standard transfer file is sent securely via the Department for Education (DfE)'s designated web service and hard copies of the pupil record may be sent on	To pass on information to a destination school or college when a student transfers
Travel companies	Student name, date of birth, passport details if relevant, medical issues, dietary requirements, next of kin contact details	To administrate school trips and visits
Cashless payments provider - ParentPay	Student name, parent or carer email address, free school meal entitlement, home address	To enable the school to operate payments electronically for services such as lunches or school trips
HMRC	Parent or carer's name, house number and postcode	To claim Gift-Aid on donations made to school by parents and carers
Photography	Student name, visual image, class or year group	To take photographs of student in school
School Nursing Provider – School-attached nurse	Student name, date of birth	To administrate and undertake immunisation programme
Sports events management provider	Student name and year group	To administrate sporting events for school students
Parents' evening system provider	Student name, date of birth, parent or carer name, relationship to student, email address and telephone number	To enable parents and carers to book appointments with teachers
School management information system provider – CAPITA SIMS	SIMS provides our school system that holds most of our student data. This is a cloud-based service which is hosted by SIMS.	To manage and run the school and share information with parents
Internet and network	Student name, date of birth, gender, unique	To enable the school network to operate and for

Who Data is Shared With	What Data is Shared	Reason for Sharing
resources provider – London Grid for Learning	pupil number, year group, parent or carer email address, relationship to child, parent or carer telephone number, attendance, absence and lateness, gifted status, special needs status, description of special needs, admission date, ethnicity, behaviour incidents, details of gifted provision	the provision of internet-based services
Homework tracking provider	Student name, unique pupil number, gender, pupil premium, special educational needs, free school meal entitlement, English as an additional language status, first language, year group, pupil email address, parent or carer name, parent or carer email address and parent or carer telephone number	To enable parents and carers, students and teachers to track students' homework and to provide the school with analysis to assess student progress
School trip management provider	Student name, date of birth, passport details if relevant, medical issues, dietary requirements, next of kin contact details	To administrate school trips and visits
Google – file sharing and teaching and learning	Student name, email address	To provide students and staff with an online learning environment
Teacher training colleges	Audio and/or visual images or recordings (where consent has been given by students and parents/carers)	To provide material for colleges to assess the quality of teaching by teachers who are training within our school.
School counselling provider	Visual image of counselling work (drawing or other work) and/or counsellor's notes	To allow the counsellor to provide counselling services, which are quality-controlled and supervised by an external supervisor
Visitors to our web site	Visual images, newsletter and student achievements	To enrich the culture of partnership with parents and to celebrate achievements and events
Visitors to our school premises for events aimed at parents	Student name	To allow the management of events and capturing attendance of events
Fitness Tracking Provider – MyZone	Student name, date of birth, weight and heart rate and fitness data	To support our students in meeting their personal fitness targets
Online Learning Support Providers	Student name, tutor group, reading age and any other relevant information	To support students learning in specific areas e.g., literacy and numeracy support

TABLE 2 – INFORMATION SHARING IN EXCEPTIONAL CASES

Who Data is Shared With	What Data is Shared	Reason for Sharing
Local authority – Social and welfare services	Student name and other information depending on the concern	To follow safeguarding procedures where there is a concern about the safety of a student. We have to share information with social services or other welfare services in certain cases to protect children.
Police services	Student name and other information depending on the concern	To follow safeguarding procedures where there are safeguarding concerns about a student; To comply with a request from a law enforcement agency where it may harm their investigation if we do not share information; To seek appropriate pastoral support from the police for students who require it
Legal advisors	Student name and other information depending on the concern	To gain advice, undertake a legal case or to assist an inquiry or investigation to which the school is a party
Local authorities	Student name, date of birth	To establish which borough provides funding for a looked-after child, in the exceptional case when the funding borough is not clear
Education Funding Agency (EFA)	Student name, address, date of birth, residency confirmation, class	To comply with EFA audit procedures on funding for 6 th form students
Health professionals	Student name, medical information and parental contact details	To deal with medical emergencies
CAMHS	Student name and other information depending on the concern	To deal with concerns relating to pupil welfare

We do not share information about you with any third parties that are not listed above without your consent - unless the law requires

us to do so.

5 – Where is my data stored?

Some of the data we process is stored on school systems only. Our network providers are LGFL and Atomwide; together they are responsible for ensuring security and safety of our managed network. Some data may be stored on the systems of organisations that we share data with, which includes cloud-based service providers. As a school, we enquire from those that we share data with about the processes and policies that providers have in place to ensure that data held on their systems is protected, including where data is transferred outside of the European Economic Area (EEA). There may be international transfer of your data where our suppliers use systems that are hosted in data centres abroad but we always endeavour to ensure that the appropriate privacy protection is in place.

6 – How can I see what data you hold about me?

You have a right to access personal information that we hold about you and can do this by contacting the Data Protection Officer.

Ms Sabin Qureshi
Director of Compliance and Data Protection
Folio Education Trust c/o Park Hill Junior School
Stanhope Road
Surrey CR0 5NS Email: squireshi@foliotrust.uk Tel: 0203 011 2767

The data controller responsible for processing your personal data is Folio Education Trust:

Mr Jonathan Wilden
Chief Executive Officer
Folio Education Trust c/o Park Hill Junior School
Stanhope Road
Surrey CR0 5NS Email: jwilden@foliotrust.uk

7 – For how long do you store data about me?

We follow the guidance of the Information & Records Management Society (IRMS) in determining our data retention policies. Please contact our Data Protection Officer for further information.

8 – What rights do I have regarding my personal data?

- The right to be informed about how your data is used and why. This is the objective of this notice.
- The right of access to see what data is held about you.
- The right to rectification of incorrect or incomplete data held about you.
- The right to erase data if there is no compelling reason for it to be held.
- The right to restrict processing of your data where there is an unresolved dispute about the data.
- The right to object to your data being processed due to your particular situation, if there is no compelling legitimate reason for your data to be processed.
- Rights in relation to automated decision making and profiling.

9 – How do I exercise my rights or make a complaint?

Please contact our Data Protection Officer if you wish to exercise your rights or wish to make a complaint about data-handling. You may also approach the Information Commissioner's Office (ico.org.uk) with your concern.

Use of Biometric Data in School

We identify students within school based on a scan of their finger. All biometric information is *sensitive personal data*. We ask that you consent as a parent or carer to register your child on this system. This document aims to address any queries you may have about the system and how and why it is used.

The system we use currently applies to:

- Registration
- Catering

There are many benefits of this system:

- Quicker identification of students, resulting in time saved on registration processes
- No need for students to carry a card or to remember a PIN code
- Time and money saved on replacement of lost or forgotten cards or PIN code
- Reduced queuing times at lunchtime and increased speed of service
- Automatic allocation of free school meals, with the student remaining anonymous
- Avoidance of problems associated with the use of cash in schools, (such as loss, theft, bullying and the misuse of dinner money through spending it in shops outside of school grounds)

Biometric identification is simply one way of quickly and uniquely recognising users in a way that can't be forgotten or lost.

How it works

1. Students register for the system by scanning their finger.
2. The scan is converted to a number.
3. The student's number is encrypted and stored in the database as a unique reference for that student.
4. When the student places their finger on the scanner in future, the software scans the finger and produces a number.
5. The system will then look up this number in the database to find the relevant match and will identify the matching student.

Scanners will be available at entry points for registration and at catering service points to allow students to purchase meals and refreshments without the need for cash or cards.

Frequently asked questions on use of biometric data as a means of identification of students in school

Are the fingerprints stored?

- No. The finger is scanned and used to generate a collection of data points which is then stored as an encrypted number on the database.

Is the data secure?

- The database is fully password protected and cannot be accessed by the copying of the physical data files. The biometric data itself is encrypted within this database. All data is held within school.

What happens when a student leaves the school?

- When a student leaves school the system will be updated to remove the leaver's data.

Can the data be reversed to produce a fingerprint?

- No. Even if this was attempted, it could never produce anything that would be usable as evidence by police or courts, because the result would not be detailed enough to meet those standards.

I have identical twins. Do they have the same fingerprint?

- Identical twins share many physical similarities but will have different fingerprints/ digital signatures, so there would not

be any mistakes made when the system identifies them.

What about cuts or other injuries?

- Unless the injury resulted in a severe disfigurement to the finger, then a biometric solution will have no problem identifying the user. Alternatively, an alternate finger can be registered for identification.

What if my child has a medical condition that makes her finger prints difficult to read?

- An alternative means of identification will be provided by the school.

I have biometric scanners in my workplace and sometimes they don't recognise my finger print. Will students go hungry if this happens to them?

- There are alternatives available if needed. No student will ever go hungry.

I don't want my child to be entered in to the biometric database, what alternatives are there?

- Any student who wishes to opt out of our biometric database will be issued with an alternative. This may be a PIN code or a card.

I'm happy for my child to be on the biometric database but what if he/she doesn't want this to happen?

- If a student refuses to participate, the school must ensure that the student's biometric data is not used as part of the biometric recognition system. A student's objection or refusal overrides any parental consent to the processing. The student will be issued with an alternative means of identification, which may be a PIN code or a card.