

Coombe Hill Infants' School Privacy Notice for Parents 2022 (How we use pupil information)

This document is intended to give you, as parents, a guideline as to how we, Coombe Hill Infants' School, use information about your child. We legally have to follow the General Data Protection Regulation (GDPR). This came into force on 25th May 2018 and is used alongside the Data Protection Act 2018.

This applies to Coombe Hill Infants' School and Coombe Connections, the school's wraparound care provider.

What categories of information are processed?

The categories of personal information that we process include the following:

- **Personal identifiers and contacts** – e.g. name, unique pupil number, contact details and address
- **Characteristics** – e.g. ethnicity, language and eligibility for free school meals
- **Safeguarding information** – e.g. safeguarding incidents and referrals to the LA; court orders; any professional involvement.
- **Special educational needs and disabilities (SEND) information** – e.g. type of special educational need; intervention information; referral information to other LA services any additional needs.
- **Medical and administration** – e.g. details of medical conditions; treatment of medical conditions and medicines to be administered; first aid incidents; allergies; dietary requirements; doctors' information, general health, dental health.
- **Attendance** – e.g. sessions attended, number of absences, reasons for absences and any previous schools you have attended
- **Assessment and attainment** – e.g. teacher assessment levels; SATS scores; progress tracking scores; or as required by the Department of Education (DfE) and any relevant test and exam results
- **Behavioural information** – e.g. behaviour incidents; behaviour monitoring; rewards information; any relevant provision put into place; exclusions.

- Asylum/Refugee status information as required by the Local Authority
- Parental contact details
- Admission numbers
- Child's birth date confirmation
- Sibling information
- Home School Partnership documentation.
- We also use photographs within school of your child. **See separate Parental Consent form.**

This list is not exhaustive – to access the current list of categories of information the school processes, please see the school's Data Asset Register which can be found on our website, under: Key Information/GDPR or by following the link below:

<https://www.coombehillinants.com/page/?title=GDPR&pid=122&action=saved>

Why do we collect and use pupil information?

We collect and use pupil information under the Section 537A of the Education Act 1996 – this information can be found in the census guide documents on the following website:

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>

- Article 6 “Lawfulness of Processing”: Processing is necessary for compliance with a legal obligation to which the controller (i.e. the school) is subject.
- Article 9 (c) “Processing of Special Categories of Personal Data”: Processing is necessary to protect the vital interests of the data subject or of another person where the data subject is physically or legally incapable of giving consent.

We may also receive information about our pupils from their previous schools or nursery, the local education authority or the Department for Education (DfE).

We will only collect your information when we have a good reason to do so in line with the law – this is known as having a lawful basis to use data. Here are the reasons we collect your information:

- To support pupil learning
- To monitor and report on pupil attainment and progress
- To provide appropriate pastoral care
- To assess the quality of our services
- To keep pupils safe
- To meet legal duties placed on us by the government
- To comply with the law regarding data sharing

How do we collect your information?

We collect your personal information via the following methods:

- Registration forms
- Common Transfer File (CTF) from your previous school
- Child protection plans

Pupil data is essential for the school’s operational use. Whilst the majority of information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with data protection legislation, we will inform you at the point of collection whether you are required to provide certain information to us or if you have a choice.

How do we store your information?

We hold pupil data in the form of secure paper and electronic records for the set amount of time shown in the school’s Data Protection Policy. This is in accordance with the Information and Records Management Society (IRMS) 2019. As guidelines become updated we will adhere to the new updates.

For more information about how we keep your information safe, please see the Data Protection Policy.

Who do we share your information with?

We routinely share your information with:

- The local authority (LA)
- The Department for Education (DfE)
- Schools that you go to after leaving us
- School Health
- The NHS

Why do we share your information?

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

We share pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

Data collection requirements:

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

We also employ other companies as data processors. We share only the necessary personal data with these companies to enable them to perform specific functions as part of the administration of the school or to deliver teaching and learning and other essential services. Examples of data processors we use are Capita, ParentPay and our catering company. The school is responsible for how these companies use your data and therefore we ensure that the companies comply with data protection laws and our policies.

Department for Education (DfE)

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

The DfE collects personal information from us and our LA through various collections the school is required to undertake legally. We are required to share information about pupils with the DfE either directly or via our LA for the purpose of those data collections, under:

- Section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013

All information we share with the DfE is transferred securely and held by the DfE under a combination of software and hardware controls which meet the current government security policy framework.

How does the government use your data?

The pupil data that we lawfully share with the DfE through data collections:

- Underpins school funding, which is calculated based upon numbers of pupils and their characteristics in each school.
- Informs 'short-term' education policy monitoring and school accountability and intervention.
- Supports 'longer-term' research and monitoring of educational policy, e.g. how certain subject choices go on to affect education or earnings beyond school.

The National Pupil Database (NPD)

Much of the data about pupils in England goes on to be held in the NPD.

The NPD is owned and managed by the DfE and contains information about pupils in schools in England – it provides evidence on educational performance to inform independent research as well as studies commissioned by the DfE.

Information on the NPD is held in an electronic format for statistical purposes and it is securely collected from a range of sources, including schools, LAs and awarding bodies.

You can find out more about the NPD by following this link:

<https://www.gov.uk/guidance/how-to-access-department-for-education-dfe-data-extracts>.

Sharing by the DfE

The DfE is legally allowed to share pupils' personal information with certain third parties, including the following:

- Schools
- LAs
- Researchers
- Organisations connected with promoting the education or wellbeing of children in England
- Other government departments and agencies

- Organisations fighting or identifying crime

Organisations fighting or identifying crime, such as the Home Office and the police, may use their legal powers to contact the DfE to request access to individual level information relating to a crime.

For more information about how the DfE collects and shares pupil information, you can look at the information in the following two links:

- <https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>
- <https://www.gov.uk/government/publications/dfE-external-data-shares>
- For information about which organisations the department has provided pupil information, (and for which project), please visit:
- <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

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

Under the Data Protection Act 2018, you are entitled to ask the DfE what personal information it holds about you. You have the right to ask the DfE:

- If it processes your personal data.
- For a description of the data it holds about you.
- The reasons it is holding your data and any recipient it may be disclosed to.
- For a copy of your personal data and any details of its source.

To exercise these rights, you should make a subject access request. Information on how to do this can be found by following this link:

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

You can also contact the DfE directly using its online contact form by following this link: <https://www.gov.uk/contact-dfe>.

What are your rights?

You have specific rights to the processing of your data; these are the right to:

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

If you want to request access to the personal information that we hold about you, please contact the Data Protection Manager, details at the end of this document.

You can also contact the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns/>. The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

How to withdraw consent and lodge complaints

Where our school processes your personal data with your consent, you have the right to withdraw your consent.

If you change your mind or are unhappy with how our school uses your personal data, you should let us know by contacting the DPO.

Updating this privacy notice

We may need to update this privacy notice periodically if we change how we collect and process data. The school will inform you when this privacy notice has changed; however, we also recommend that you revisit this privacy notice periodically.

This privacy notice was last updated on 31st March 2022

How can you find out more information?

If you would like to discuss anything in this privacy notice, please contact:

Jackie Patel
Data Protection Manager
Coombe Hill Infants' School
Coombe Lane West
Kingston
KT2 7DD

020 8942 9481
admin@chi.rbksch.org

If you require further information about how we and/or the DfE store and use your personal data, please visit our website, <https://www.coombehillinfants.com/>, the Gov.UK [website](#)