

## 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 6<sup>th</sup> form students
- Undertaking fundraising for the school through sending out CWSA 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 fingerprint<sup>1</sup>
- Photographic, audio or video material of students
- 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, | To administrate school admissions |

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

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|--|--|---|
|  | school application reference number and unique pupil number, EHCP and SEND information   |   |
| 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 carer telephone details   | To comply with legal obligation on the school to share information with local authority in respect of safeguarding, promoting welfare and reporting children missing from education   |
| Learning records service                     | Student name, date of birth, address   | To obtain unique learner numbers (ULN's) which are a means of uniquely identifying each child   |
| Department for Education (DfE) - Census      | All census data fields as listed in the Department for Education (DfE) document "School Census 2019 to 2020" pp. 27-57 <sup>2</sup>  | <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  |
| ASSET for Schools Groupcall                  | Student attendance data (Looked After Children only)   | To assist with the monitoring and tracking of Looked After Children's attendance and progress   |
| 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 student 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   | To administrate school trips and visits   |

<sup>2</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/854226/2019-20\\_School\\_Census\\_Business\\_and\\_Technical\\_Specification\\_Version\\_1.7.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/854226/2019-20_School_Census_Business_and_Technical_Specification_Version_1.7.pdf)

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|--|--|--|
|  | contact details  |  |
| 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  |
| School Nominated Photographer                                      | Student name, visual image, admission number, tutor group and/or year group  | To take photographs of students in school for the purpose of the school management information system, medical alerts and for home/parental purchasing |
| School Nursing Provider – Croydon Health Services NHS Trust        | Student name, date of birth, tutor group and parent contact details  | To administrate and undertake immunisations under the national vaccination programme   |
| Sports events management provider                                  | Student name, tutor group and/or 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 – 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  |
| Automated Pre-Admissions Provider                                  | Student name, date of birth, home address, parent or carer details, dietary requirements, medical and SEND details   | To streamline the admissions process by enabling parents to complete the registration process for their child online                                   |
| Internet and network resources provider – London Grid for Learning | Student name, date of birth, gender, unique 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 | To enable the school network to operate and for 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, audio and video images  | 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  | Visual images, newsletter and  | To enrich the culture of partnership with  |

|   |   |   |
|---|---|---|
| site  | student achievements  | 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, heart rate and fitness data                                    | To support our students in meeting their personal fitness targets   |
| Online Careers Platform - START                             | Student admission number, ULN, name, date of birth, gender, year group                              | To support our students in researching career paths as part of the PSHE national curriculum                   |
| 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                            |
| Provision Map - SEND Support Tool Provider                  | Student name and related details including any other relevant personal and SEND related information | To enable the SEND department to more effectively map and manage provision                                    |
| Automated sports analytics provider                         | Sports related audio, video and still images  | To enable the provision of analytics and feedback to students and to record and live-stream sporting fixtures |

Folio schools are part of a collaborative working model. This means that staff from one school may observe teaching and learning from another school in order to help assess our performance across all schools within the Trust.

- This happens from time to time and all staff involved in this process would certainly have the appropriate security clearances, data protection and safeguarding training that we expect across the board in all of our schools.
- In addition to this, we may from time to time bring in outside contractors to support this work, particularly where they have specialist skills or experience, for example, trained OFSTED inspectors who might observe our physical/online teaching and learning or other aspects of our school management.

**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;<br>To comply with a request from a law enforcement agency where it may harm their investigation if we do not share information;<br>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 <sup>th</sup> 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 Coombe Wood School  
30 Melville Avenue  
South Croydon CR2 7HY                      Email: [squireshi@foliotrust.uk](mailto: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 Coombe Wood School  
30 Melville Avenue  
South Croydon CR2 7HY                      Email: [jwilden@foliotrust.uk](mailto: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](http://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:

- 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 queueing 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 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.