

## **Privacy Notice**

### Schools' Privacy Notice for Parents / Carers

#### **Who is collecting information?**

Coombe Girls' School, Coombe Boys' School and Knollmead Primary School are part of the Coombe Academy Trust. For the purposes of Data Protection law, the Coombe Academy Trust is the Data Controller. This means it is in charge of personal information about our pupils and their families.

The postal address of the Coombe Academy Trust is:

Coombe Boys' School,  
College Gardens,  
New Malden.  
Surrey  
KT3 6NU

If you want to contact the Trust about your personal information you can contact our Data Protection Officer, Mrs Suzanne Dwyer. You can speak to her directly in school, leave a letter at Reception or send one, by post, or email [dataprotection@coombe.org.uk](mailto:dataprotection@coombe.org.uk).

In this policy 'we', 'us' and 'the Trust' mean the Coombe Academy Trust.

#### **What information is collected?**

The Trust collects and holds personal information relating to our pupils and may also receive information about them from their previous school, local authority and / or the Department for Education (DfE). The Trust collects the following personal information on pupils

- Contact details
- Parent(s) / guardian(s) details
- National curriculum assessment results
- Attendance information
- Any exclusion information
- Where they go after they leave school
- Personal characteristics such as their ethnic group
- Any special educational needs they may have as well as relevant medical information.
- For pupils enrolling for post 14 qualifications, the Learning Records Service will give us the unique learner number (ULN) and may also give us details about their learning or qualifications.
- We will also use photographs of pupils. More details about this are in our photograph policy.

#### **Why is information being collected?**

The Trust has a legal basis for collecting data where:

- It is under a legal obligation to collect the information or the information is necessary for it to meet legal requirements imposed upon it, such as the duty to safeguard pupils.
- It is necessary for the Trust to hold and use pupil information for the purposes of its functions in providing schooling and therefore its duty of care for pupils.
- Consent is not required where our collecting and processing of data is covered by the above legal bases which apply to most of the data we process. However, if at any time it appears to us that we would need consent then this will be sought before collection is made. For example, a routine requirement for consent is using photographs in publications or online.

We have a separate photograph policy which you will have received on joining the school and is available on the Trust website.

### **How is the information collected?**

- Application forms
- Regular data collection forms
- The schools within the Trust generate data such as
  - attendance
  - progress and attainment
  - behaviour records
  - Purchases through ParentPay and in the canteen
- Medical forms
- Trip & activity consent forms
- Data transferred to us from other schools and organisations (e.g. local authorities, DfE, Learning Records Service, etc)

### **How will the information be used?**

We hold this personal information to:

- support our pupils' learning
- monitor and report on their progress
- provide appropriate pastoral care; and
- assess the quality of our services
- to comply with the law about sharing personal data

### **Who will the information be shared with?**

In its operation as data controller, the Trust employs other companies as data processors. Personal data is shared with these companies to enable them to perform specific functions as part of the administration of the schools or to deliver teaching & learning and other essential services. Examples of data processors we use are: ParentPay, ParentMail, Pabulum (our catering provider), etc. The Trust is jointly responsible for how these companies use your data and therefore the Trust ensures that the companies comply with data protection laws and the Trust policies.

The Trust also shares data with government departments, local authorities and other public bodies to comply with its legal obligations and in the interests of providing education, safeguarding and pastoral care.

The organisations the Trust may routinely share data with are:

- The Department for Education (including National Pupil Database): <https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>
- Local authorities - Kingston: <https://achievingforchildren.org.uk/wp-content/uploads/2016/09/2015-Information-Sharing-Policy.pdf>
- Your new school or college, if you move schools
- Disclosures connected with SEN support – e.g. The SEN and Disabilities Integrated Service, Merton, Jigsaw
- School nurse
- School counsellor
- CAMHS (Child and Adolescent Mental Health Service)
- Any other organisations where the disclosure is in the pupils' interest

The information disclosed to these people / services may include sensitive personal information. Usually this means information about a pupil's health and any special educational needs or any disabilities they may have. We do this because these services need the information so that they can support our pupils.

Our disclosure of your or pupils personal data is lawful for the following reasons:

- The Trust is under a legal obligation to disclose the information or disclosing the information is necessary for us to meet legal requirements imposed upon us such as our duty to look after our pupils and protect them from harm.
- It is necessary for us to disclose your information for the purposes of our functions in providing schooling. This is a function which is in the public interest.
- We have a legitimate interest in disclosing your information because it is necessary in order to provide our pupils with education and pastoral care and connected purposes as outlined above.
- We will not usually need consent to disclose your information for these purposes. However, if at any time it appears to us that we would need consent then this will be sought before a disclosure is made.

### **How long we keep your information**

We keep your information only for as long as we need to or for as long as the law requires us to. Most of the information we have about pupils will be in our pupil files. We usually keep these until a pupil's 25th birthday unless they move to another school in which case we send their file to their new school. We have a policy which explains how long we keep information. It is called a Records Retention Policy and you can find it on the Trust website or ask for a copy at reception.

### **Your rights**

You have the following rights under the data protection laws:

- You can ask us for a copy of the information we have about you
- You can ask us to correct any information we have about you if you think it is wrong
- You can ask us to erase information about you (although we may have good reasons why we cannot do this)
- You can ask us to limit what we are doing with your information
- You can object to what we are doing with your information
- You can ask us to transfer your information to another organisation in a format that makes it easy for them to use.
- Subject Access Requests. We will respond to Subject access requests in a timely manner, but please be aware that during school holidays this may become more difficult.

There is more information in our Data Protection Policy or you can ask Mrs Suzanne Dwyer. You can complain about what we do with your personal information. If you are not happy with our answer to your complaint then you can complain to the Information Commissioner's Office:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Tel: 0303 123 1113

