NAME OF SCHOOL

[NAME OF NOTICE HOW WE USE PUPIL DATA]

Information Governance Team

Lisa Richards - Data Protection Officer
Sam Bishop/Rebecca Walsh - Data Disclosure and Records Officer

Civic Centre, Castle Street, Merthyr Tydfil, CF47 8AN
Data.Protection@merthyr.gov.uk
01685 7250000

This notice has been written in accordance with the General Data Protection Regulations and relevant legislation.

Date Created:	25 May 2018
Headteacher:	Jacqueline Roome
Address:	Troedyrhiw Community Primary, Archer Street, Troedyrhiw
Telephone Number:	01685 351819

Troedyrhiw Community Primary is responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to all users of the school which includes children attending our school, parents, carers, guardians, we may also hold information relating to our pupils siblings who have not yet began school or have left our school. This notice does not form part of any contract to provide services. We may update this notice at any time if we do we will ensure that an updated copy of this notice is made available to you as soon as reasonably practical.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

Troedyrhiw Community Primary is the Data Controller and is committed to protecting the rights of individuals in line with the Data Protection Legislation including the GDPR.

Contact details of the Data Protection Officer

Troedyrhiw Community Primary has appointed a Data Protection Officer who can be contacted using the following details:

Mrs. Lisa Richards (Data Protection Officer)

Address:	Information Governance Team Merthyr Tydfil County Borough Council Civic Centre Castle Street Merthyr Tydfil CF47 8AN	Email: Tel: Fax:	data.protection@merthyr.gov.uk 01685 725000 01685 725060

WHAT INFORMATION DO WE HOLD ABOUT YOU

Personal data, or personal information, includes any information about an individual from which that person can be identified. There are special categories of more sensitive personal data which require a higher level of protection, such as information about a person's health or sexual orientation.

We will collect, store, and use some of the following categories of personal information about you and your child:

- Personal Descriptors including:
  - Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
  - Date of birth.
  - Gender.
  - Marital status.
  - Siblings.
  - Dependants.
  - Next of kin and emergency contact information.
  - CCTV footage and other information obtained through electronic means.
  - Photographs.
  - Free school meal entitlement
- Identification Numbers:
  - ID Numbers.
  - Health IDs.
- Financial Details:
  - Bank account details.
  - Compensation history.
- Education:
  - Education History.
  - Exam Results.
  - Predicted Grades.
  - Assessment and attainment data, such as key stage 1 and phonics results, post 16 courses enrolled for and any relevant results.
  - School attendance records such as sessions attended, number of absences, absence reasons and any previous schools attended.
  - Behavioural information such as exclusion and suspension data.

We may also collect, store and use the following special categories of personal information:

- Information about your race or ethnicity, language, religious beliefs, sexual orientation and political opinions.
- Family or individual health history, health records, blood type, current and past medications and prescriptions.
- Information about your child's health, including any medical condition, health and sickness records, dental health, allergies, dietary requirements, special educational needs or additional learning needs information.
- Safeguarding information such as court orders and professional involvement.

- Genetic information which may include inherited or acquired genetic characteristics.
- Biometric data including finger prints.
- Information about criminal convictions and offences.

HOW IS YOUR PERSONAL INFORMATION COLLECTED

We collect personal information about our pupils through the admissions form and other information supplied to us by the Local Education Authority and other departments of Merthyr Tydfil County Borough Council), we will also receive information directly from the pupil, parent, guardian or carer.

We may sometimes collect additional information about our pupils from third parties including:
- Other local authorities
- Neighbouring schools
- The National Health Service
- Police force
- Other government agencies
- Charities that help and support children
- Family members or known associates of the child

We will collect additional personal information in the course of our operational functions as an educational establishment and the services we provide to our pupils throughout their time at school. We will input our pupil's personal information into our school computer systems.

We also collect personal information about the parents, carers or guardians of our pupils during the course of our operational functions. This may include information about our pupils family life, including separation of parents, the birth of a new sibling, the death of a relative etc. this information will be obtained either directly from a family member, the pupil or a third party as listed above.

HOW WE WILL USE INFORMATION ABOUT YOU

We will only use your personal information when the law allows us to. We will use your personal information in the following circumstances:

1. Where we have received your consent to provide you with a service.
2. Where we need to comply with a legal obligation.
3. Where we need to protect your interests (or someone else's interests).
4. Where it is needed in the public interest or for official purposes.
5. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Situations in which we will use your personal information

We need all the categories of information in the list above primarily to allow us to perform our services as an education provider which will enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Consent:
    - To respond to and consider any complaints made by parents, guardians and carers.

- To enable the pupils to engage with and participate in activities and events taking place within the school

- Legal Obligation:
  - To support pupil learning
  - To monitor and report on pupil attainment progress which will include exam results
  - To provide appropriate pastoral care
  - To investigate or report on concerns of the pupil received from third parties
  - To administer free school meal entitlement
  - To provide a provision of welfare, including safeguarding, social services involvement and accessing health services
  - To encourage Welsh language development

- Protecting your Interests:
  - To keep children safe (food allergies, or emergency contact details)

- Official Purposes (Public Task):
  - To assess the quality of our services
  - To meet the statutory duties placed upon us for Welsh Governments data collections
  - To enhance personal and social development, well-being and cultural diversity
  - To develop language, literacy and communication skills
  - To improve mathematical development
  - To develop knowledge and understanding of the world
  - To improve physical development
  - To encourage creative development

- Legitimate Interests:
  - To promote healthy lifestyle habits
  - To give support and guidance to pupils, their parents and legal guardians

HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

Special categories of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent such as administering medication prescribed by a doctor.
2. Where we need to carry out our legal obligations or exercise rights in connection with our public task in connection with:
   - Delivering the school curriculum for Wales which is made up of:
     - the Foundation Phase
     - the national curriculum
     - the literacy and numeracy framework
     - personal and social education
     - sex and relationships education

- careers and the world of work
- religious education
- the digital competence framework

- Developing Educational Skills and training in accordance with the Welsh Government Statutory codes and guidance
- Supporting children and young people with additional learning needs (ALN) in Wales in accordance with the Additional Learning Needs and Education Tribunal (Wales) Act 2018, the Education Act 1996 and the SEN Code of Practice for Wales.
- To comply with our legal obligations imposed under the following Acts:
  - School Sites Act 1841
  - Education Act 1962
  - Education Act 1973
  - Education Act 1980
  - Education (Fees and Awards) Act 1983
  - Further Education Act 1985
  - Education (No.2) Act 1986
  - Education Reform Act 1988
  - Education (Student Loans) Act 1990
  - Further and Higher Education Act 1992
  - Education Act 1994
  - Education Act 1996
  - Education Act 1997
  - Education (Schools) Act 1997
  - Teaching and Higher Education Act 1998
  - School Standards and Framework Act 1998
  - Learning and Skills Act 2000
  - Education Act 2002
  - Higher Education Act 2004
  - Education Act 2005
  - Education and Inspections Act 2006
  - Further Education and Training Act 2007
  - Sale of Student Loans Act 2008
  - Education and Skills Act 2008
  - Learner Travel (Wales) Measure 2008
  - Education (Wales) Measure 2009
  - Healthy Eating in Schools (Wales) Measure 2009
  - Learning and Skills (Wales) Measure 2009
  - Apprenticeships, Skills, Children and Learning Act 2009
  - Education Act 2011
  - Education (Wales) Measure 2011
  - Safety on Learner Transport (Wales) Measure 2011
  - School Standards and Organisation (Wales) Act 2013
  - Further and Higher Education (Governance and Information) (Wales) Act 2014
  - Education (Wales) Act 2014

3. Where it is needed in the public interest, such as for equal opportunities monitoring.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of

giving your consent, or where you have already made the information public.

DATA SHARING

We may have to share your data with third parties, including third-party service providers. We require third parties to respect the security of your data and to treat it in accordance with the law.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the services we are providing to you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

Our school uses a number of data processors to assist us in delivering an interactive and engaging teaching solution. This includes interactive educational games and apps which our pupils access, with consent of their parent, guardian or carer.

We may engage with local service providers such as videographers, photographers, musicians, librarians, the fire service or police force to deliver services to our pupils and to document school activities.

We also use other technological solutions to help us prepare our classroom planning activities, to report on our pupil's health and wellbeing in addition to providing our annual and statistical returns to the Local Education Authority. The following is a list of providers we may use to facilitate these activities which include interactive games and learning resources for our pupils to use and also management software solutions that we use to facilitate our education delivery programmes:

1. Abacus Resources
2. Accelerated Maths
3. Aurasma
4. Book Creator
5. CATS
6. Class Dojo
7. Colorfoto
8. eCadets
9. Edukey: Class Charts and provision map
10. Essential Skills Wales
11. Every Child Counts
23. G.L. Assessments
24. Google Classroom
25. ICT games
26. IXL Maths
27. I-Movie
28. Just 2 Easy
29. Kahoot!
30. Khan Academy
31. Lucid LASS
32. Mathletics

- Evolve
- FFT Aspire
- Midyis
- Mind Mup2
- Movie maker
- Padlet
- Penigamp
- Prezi
- Prodigy
- Purple Mash
- Read Theory
- Read Write Inc
- Schoop
- Scratch
- Seesaw
- Show me
- Show my homework
- Sketchup
- Mathsbot
- Mathsframe
- Skoolbo
- Speechlinks
- Spelling City
- Spelling Frame
- Storybird
- Story Nory
- Sumdog
- Teachers2Parents
- Teaching Continua
- Thrive assessments
- Times Table Rock Stars
- Topmarks
- Twinkl
- Word Shark/Number Shark
- Ziptales
- Zoho Creator

How secure is my information with third-party service providers and other data controllers?

All our third-party service providers and other data controllers are required to take appropriate security measures to protect your personal information in line with the Data Protection Legislation. Our third party suppliers and data controllers will provide you with information on how they use your personal information.

We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When might you share my personal information with other data controllers?

We will share your personal information with other data controllers as part of our regular reporting activities on education delivery, in order to report any safeguarding issues to the local safeguarding board, for additional support and delivery of our core activities as an educational establishment, for system maintenance support and hosting of data.

We may share anonymised personal data on an annual basis regarding our pupils educational attainment with Welsh Government through their online portal for research and statistical analysis performed in order to improve education provided to pupils in Wales.

We also use the Welsh Government online schools portal, Ffynon to access DEWI, S2S and also Hwb a digital learning resource for Wales. We also use CAPITA educational systems such as SIMS and MyConcern.

We may share statistical information with the National Foundation for Educational Research for statistical analysis and research purposes.

We will also share personal data with the Central South Consortium Joint Education Service with statistical information relating to your participation in school activities, we will also access their online materials through Cronfa; we will share information with Careers Wales to assist you with your career choices and pathways. We may also be required to submit a referral to or liaise with the Multi Agency Safeguarding Hub which is made up of professionals from the Local Authority, South Wales Police Force, Cwm Taf Health Board and other charities and organisations for the purposes of protecting and promoting the safety and welfare of our pupils, parents and staff.

What about other third parties?

We may also need to share your personal information with a regulator or to otherwise comply with the law. This may include the National Health Service, the Police, the Ombudsman, the Information Commissioners Office or other Government Department and appointed Regulatory Commissioner's.

Transferring information outside the EU

We will not transfer your data to any countries outside of the EU. If we do we will inform you as soon as possible. If we do, you can expect a similar degree of protection in respect of your personal information.

DATA RETENTION

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Details of retention periods for different aspects of your personal information are available in our Records Management policy which is available from the Councils Information Governance Team who can be contacted on the details provided at the top of this notice. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer receiving services from the [SCHOOL] we will retain and securely destroy your personal information in accordance with our Records Management Policy including any applicable laws and regulations.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the responsible manager detailed at the top of this notice in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances. If you would like to submit a request for your information please contact our Data Protection Officer.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate

security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the responsible manager detailed at the top of this notice. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

MAKING A COMPLAINT

We have appointed a data protection officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer using the contact details provided at the top of this privacy notice. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues:

Information Commissioner's Office (Wales)
2nd Floor
Churchill House
Churchill Way
Cardiff
CF10 2HH

Tel: 029 2067 8400
Fax: 029 2067 8399
Email: casework@ico.org.uk

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will ensure that the new privacy notice is made available to you when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.