

Ysgol Harri Tudur/Henry Tudor School Privacy Notice



Introduction. This pupil privacy notice provides information on how Ysgol Harri Tudur/Henry Tudor School (YHT) manages personal information in accordance with local authority and governmental direction.

How & why we collect and use pupil information

The categories of pupil information that we may process include:

- personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- characteristics (such as ethnicity, biometric data, language, and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including the needs and ranking)
- medical and administration (such as doctor's information, school nurse, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as key stage 1 and phonics results, post 16 courses enrolled for and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- contact information for school trips/excursions (parent contact details, emergency contacts, passport details, health/medical information)

We collect and use pupil information under section 537A of the Education Act 1996, and section 83 of the Children Act 1989.

We collect and use pupil information, for the following **purposes**:

- as part of our admissions process
- to support pupil learning
- to monitor and report on pupil attainment progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to keep children safe (food allergies, or emergency contact details)
- to meet the statutory duties placed upon us for DfES data collections
- to comply with the law regarding data sharing
- to support parents/guardians to decide what to do after pupils leave school

Under the General Data Protection Regulation (GDPR), the **lawful bases** we rely on for processing pupil information are:

- Because we have been given **consent** (e.g. use of pupil photographs)
- Because it is necessary for the performance of a **contract** to do so (e.g. staff records, financial)
- Because we have a **legal obligation** to process (e.g. pupil census returns, pupil records)
- Processing is necessary to protect the **vital interests** of a data subject or another person (e.g. sharing emergency contact info)
- Because it is necessary for the performance of this **public task** to do so (e.g.

pupil record, accident reporting, behaviour logs, trips & visits, curriculum tools, school nurse)

- Because it is necessary for the purposes of **legitimate interests** to do so (e.g CCTV, signing in/out logs)

In addition, concerning any special category data, under the General Data Protection Regulation (GDPR), the conditions under Article 9 we rely on for processing pupil information are:

- Because we have been given explicit consent to do so (e.g. Biometric catering system)
- Because it is necessary for us to carry out our specific obligations as data controller to do so (e.g. some data held in your pupil record)
- Because it relates to a legal claim to do so (e.g. in some instances CCTV)

How we collect pupil information

We collect pupil information via admissions/information forms at the start of the school year or secure file transfer from previous school.

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

How we store pupil data

We keep information on computer systems and also sometimes on paper. We hold education records securely (computerised and paper) in accordance with guidance issued by the Local Authority regarding document retention i.e. to comply with legal requirements e.g. date of birth plus 25 years for prime documents linked to safeguarding, SEN, Educational Psychology, School Admissions, EWS and 7 years for PLASC counts, class counts, SEN registers, School Action Plans, GEMS intervention referrals, admissions reports, school meals reports etc after which they are safely destroyed.

Biometric fingerprint data relating to the school catering card system is destroyed as pupils leave school in years 11, 12 and 13. Access to the school's IT and Data Systems is restricted to authorised individuals only and is underpinned and protected by our Digital Safety and Acceptable Usage Policies. Access is logged and routinely monitored to protect users and the integrity and security of systems and data.

We adhere to the following retention periods for school files which contain personal data, these can be viewed at <https://www.pembrokeshire.gov.uk/privacy-promise/how-long-do-we-keep-hold-of-your-information>

Access to data on all laptop computers is secured through encryption or other means, to provide confidentiality of data in the event of loss or theft of equipment. Backups are also encrypted.

After the retention periods data is deleted securely from our systems. Where data resides on third party systems e.g. Google Apps, contracts exist to ensure data security, integrity and retention periods match legislation within our in-house systems. All system backups are encrypted and are held in multiple, physically secure locations as part of the school's disaster recovery plan.

There are strict controls on who can see information. We will not share data if we have been advised not to unless; it is the only way we can make sure pupils stay safe and healthy, we are legally required to do so or the data is required for operational purposes.

Paper records are held in lockable cabinets. Control to areas where records are stored is restricted – pupils and visitors are not permitted to access any such area unless required and under the supervision of a staff member.

Who & why we share pupil information

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority, Health Board, Careers Wales & Welsh Government
- youth support services (pupils aged 13+)
- the Department for Education (DfES)

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

Youth support services

Pupils aged 13+ and 16+

Once our pupils reach the age of 13, we also pass pupil information to the Local Authority and/or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996. This enables them to provide youth services and careers advice.

The information shared is limited to the child's name, address and date of birth. However, where a parent/ guardian provides consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child / pupil once they reach the age 16.

For more information about services for young people, please visit our local authority website see link <http://www.pembrokeshireyouth.co.uk/content.asp?nav=3>

Department for Education and Skills in Wales (DfES)

The DfES collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our pupils with the DfES either directly or via our local authority for the purpose of those data collections. All data is transferred securely and held by DfES under a combination of software and hardware controls, which meet the current government security policy framework.

Pupil data that we lawfully share with the DfES through data collections:

- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).
- supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

Requesting access to your personal data & your rights

Under data protection legislation, parents/guardians and pupils have the right to request access to information about them that we hold. To make a request for personal information, or be given access to your child's educational record contact: Access to Records Team, Pembrokeshire County Council, County Hall, Haverfordwest or email: accesstorecords@pembrokeshire.gov.uk

You also may have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- a right to seek redress, either through the ICO, or through the courts

Complaints or Queries

YHT endeavours to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this seriously. We encourage people to bring to our attention if they believe that our collection or use of information is unfair, misleading or inappropriate.

This privacy notice does not provide exhaustive detail of all aspects of our collection and use of personal information. If you have any further queries please direct them in the first instance to: Mr Nick Makin, School Business Manager, Ysgol Harri Tudur/Henry Tudor School, Pembroke, SA71 4RL or via contact@yht.wales

Local Authority Data Protection Officer

Jo Hendy
Data Protection Officer
Pembrokeshire County Council
County Hall, Haverfordwest,
SA61 1TP
Email: dataprotection@pembrokeshire.gov.uk

If you want to make a complaint about the way we have processed your personal

information, you can contact the Information Commissioner's Office as the statutory body which oversees data protection law at the following;

Information Commissioner's

Office Wycliffe House

Water Lane Wilmslow SK9 5AF

Email; caseworker@ico.org.uk Telephone No: 0303 123 1113