



Heol Gelli Haf
Fleur De Lys
Y Coed Duon
NP12 3JQ

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Privacy Notice Name: Processing pupil information

Description of Privacy Notice: This Privacy Notice describes how the school will process personal information about pupils and families.

Full Privacy Notice

How we will use your information

Source and type of information being processed

Categories of personal data obtained

Most of the information that the school holds/uses about you has been collected from you directly, but some information may have been received from other organisations/sources, as listed below.

The school has obtained the following categories of your personal data that make up your education record:

- personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- characteristics (such as ethnicity, language, free school meal eligibility and immigration status)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including the needs and ranking)
- medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- performance in internal and national assessments and examinations
- behavioural information (such as exclusions and any relevant alternative provision put in place)

Source of the personal data

This information has been collected from:

- Pupils/families directly, (e.g. via registration forms at the start of the school year, school trip applications, etc)
- Caerphilly County Borough Council Education Directorate
- Caerphilly County Borough Council Social Services Directorate (if applicable)
- This information has been shared with the school by a previous school attended by the pupil

If you would like further information on the source of this information please contact the school.

Your Obligations

Certain pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory due to a legal or contractual obligation (see below), some of it is optional, and if this is the case you will be asked to give your consent.

We will inform you at the point of collection whether you are required to provide certain pupil information to us or if you have a choice in this, and any consequences should you decide not to provide information or to subsequently withdraw consent.

Purpose and legal basis for using your information

Purpose of processing

We process personal information about pupils and their families:

- to support pupil learning
- to monitor and report on pupil 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 Welsh Government data collections
- to administer trips and activities, catering and free school meal management, which may include identity management/authentication using biometrics.

Legal basis for processing

For the processing of personal data to be lawful, an Article 6 condition from the General Data Protection Regulations 2016 is required.

- Mandatory school processing of pupil information is covered by the Article 6 condition - processing is necessary for compliance with a legal obligation to which the controller is subject. The legal obligation is contained within the Education Act 1996 and associated Welsh Government regulations.
- Optional processing of personal data is covered by the Article 6 condition – explicit consent. If this is case, you have the right to withdraw consent. Please contact the school for further information.

Data Protection legislation provides extra protection for certain classes of information called 'special category' personal data, which includes:

- Physical or mental health or condition
- Politics
- Racial or ethnic origin
- Religion or other beliefs of a similar nature
- Sex life
- Sexual orientation
- Trade union membership
- Genetics
- Biometrics (where used for identification purposes)

Data Protection legislation also provides extra protection for personal data in relation to criminal allegations, proceedings, outcomes and sentences.

If any information falls within these definitions, additional conditions are required from Article 9 for special category personal data and Article 10 for personal data relating to crimes. These additional conditions are contained in the UK Data Protection Bill, due to be enacted during 2018. When the Bill has been enacted this privacy notice will be updated, but if you have any questions in the meantime please contact the school.

Who will have access to your information

Identity of Data Controller and Data Protection Officer

The Data Controller for your information is Ysgol Gyfun Cwm Rhymni.

The Data Protection Officer is contracted by the school to Caerphilly County Borough Council. You can contact the school Data Protection Officer on 01443 864322 or by email at dataprotection@caerphilly.gov.uk

Details of any sharing of your information with other organisations

We must share certain pupil information with specific organisations, but only with a clearly defined reason and an appropriate legal basis under data protection law.

We always ensure that the sharing of personal information is securely undertaken.

Organisation	Reason and lawful basis
School that the pupil subsequently attends	Continuity of education - compliance with a legal obligation (Art 6 GDPR)
Caerphilly County Borough Council	To monitor education provision and research to inform policy and funding decisions- compliance with a legal obligation (Art 6 GDPR) To provide IT support – performance of a contract (Art 6 GDPR) To provide Health and Safety support - performance of a contract (Art 6 GDPR) To defend insurance claims – legitimate interests (Art 6 GDPR) and legal proceedings (Art 9 GDPR) To administer Special Educational Needs support – public task (Art 6 and 9 GDPR) Safeguarding purposes – compliance with a legal obligation, vital interests, or public task (Art 6 and 9 GDPR)

Welsh Government (further detail below)	Provision of statistics to monitor education - compliance with a legal obligation (Art 6 GDPR)
Aneurin Bevan University Health Board	To provide a school health service – public task (Art 6 GDPR); public health (Art 9 GDPR) Safeguarding purposes – compliance with a legal obligation, vital interests, or public task (Art 6 and 9 GDPR)
Youth support services (pupils aged 13+)	Education or training of 13-19 year olds (S507B of the Education Act 1996) - compliance with a legal obligation (Art 6 GDPR)
Blaenau Gwent County Borough Council Caerphilly County Borough Council Merthyr County Borough Council Newport County Borough Council	School Transport - compliance with a legal obligation for contracts (Art 6 GDPR)

Sharing information with Welsh Government

The Welsh Government receives information on pupils directly from schools normally as part of statutory data collection which consists of the following:

- Post-16 data collection
- Pupil Level Annual School Census (PLASC)
- Educated other than at school (EOTAS) pupil level collection
- National data collection (NDC)
- Attendance collection
- Welsh National Tests (WNT) data collection

In addition to the data collected as part of PLASC, the Welsh Government and local authorities also receive information regarding National Curriculum assessments, public examination results, and attendance data at individual pupil level which comes from Schools and /or Awarding Bodies (e.g. WJEC).

The Welsh Government uses this personal information for research (carried out in a way that ensures individual children and young people cannot be identified) and for statistical purposes, to inform, influence and improve education policy and to monitor the performance of the education service as a whole. Examples of the sort of statistics produced can be viewed at www.wales.gov.uk/statistics. Further information is on the Welsh Governments' use of personal data is set out within the Welsh Governments' Privacy Policy which is available here.

Details of any external data processors

Parentmail
Chartwells

Requests for information

All recorded information held by the school may be subject to requests under the Freedom of Information Act 2000, Environmental Information Regulations 2004 and data protection law (General Data Protection Regulations 2016 and Data Protection Act 2018).

If the information you provide is subject to such a request, where possible the school will consult with you on its release. If you object to the release of your information we will withhold your information if the relevant legislation allows.

How long will we retain your information

We hold pupil data securely for the set amount of time documented in our data retention schedule.

- Primary schools will retain information whilst the child remains at the primary school, and securely transfer the information to the secondary school or alternative provision when the child moves on.
- Secondary schools will retain information about pupils and their families for 25 years after the pupil's birth date.

Information with historic value will be transferred to Gwent Archives or Glamorgan Archives, but any personal information will be subject to an appropriate closure period so that it is restricted from public inspection.

For more information contact Gwent Archives on 01495 353363 enquiries@gwentarchives.gov.uk www.gwentarchives.gov.uk or Glamorgan Archives on (029) 2087 2200 GlamRO@cardiff.gov.uk <https://glamarchives.gov.uk/>

Your Rights (including complaints procedure)

Your rights under data protection law

Data protection law gives data subjects (those who the information is about) a number of rights:

- The right of subject access
- The right to be informed
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to object
- The right to data portability
- Rights in relation to automated decision making and profiling.

Further information on your rights is available from: www.ico.org.uk.

To exercise your rights please contact the school.

Complaints Procedure

If you are unhappy with the way that the school has handled your request / information, you have the right of complaint. Please contact the school outlining your concerns in the first instance.

If you remain unhappy you can contact the schools Data Protection Officer on 01443 864322 dataprotection@caerphilly.gov.uk

You can also complain to the Information Commissioner's Office on 029 2067 8400.