Porthcawl Comprehensive School

Privacy Notice

Privacy Notice for Porthcawl Comprehensive School

This privacy notice describes how we collect and use personal information about pupils, in accordance with the UK General Data Protection Regulation (UK GDPR), section 537A of the Education Act 1996 and section 83 of the Children Act 1989.
Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

Who Collects This Information?
Porthcawl Comprehensive School is a "data controller." This means that we are responsible for deciding how we hold and use personal information about pupils and parents.
We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of any contract of employment or other contract to provide services and we may update this notice at any time.
It is important that you read this notice, together with any other policies mentioned within this privacy notice. This will assist you with understanding how we process your information and the procedures we take to protect your personal data.

Data Protection Principles
We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

Categories of Pupil Information We Collect, Process, Hold and Share
We may collect, store, and use the following categories of personal information about you:

- Personal information such as name, pupil number, date of birth, gender, and contact information;
- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses;
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility);
- The pupil's level of fluency in the Welsh Language and how this has been assessed/provided;
- Attendance details (such as sessions attended, number of absences and reasons for absence);



- Performance and assessment information;
- Behavioural information (including exclusions);
- Additional Learning Needs information;
- Relevant medical information;
- Special categories of personal data (including biometric data, ethnicity, relevant medical disability status; if the pupil is in the care of the local authority, if the pupil is receiving support from other agencies, biometric information);
- Images of pupils engaging in school activities, and images captured by the School's CCTV system;
- Information about the use of our IT, communications and other systems, and other monitoring information;
- Post 16 learning information;
- Financial information;
- Counselling information/records;
- School history; and
- Registration status and full time or part time status

Collecting this Information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. To comply with the UK General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

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.

How We Use Your Personal Information

We hold pupil data and use it for:

- Pupil selection (and to confirm the identity of prospective pupils and their parents);
- Providing education services and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Informing decisions such as the funding of schools;
- Assessing performance and to set targets for schools;
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care;
- Support teaching and learning;
- Giving and receive information and references about past, current and prospective pupils, and to provide references to potential employers of past pupils;
- Managing internal policy and procedure;
- Enabling pupils to take part in assessments, to publish the results of examinations and to record pupil achievements;
- To carry out statistical analysis for diversity purposes;
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care;
- Enabling relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;



- Monitoring use of the school's IT and communications systems in accordance with the school's IT security policy;
- Making use of photographic images of pupils in school publications, on the school website and on social media channels;
- Security purposes, including CCTV; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

The Lawful Basis on which we use this Information

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Consent: the individual has given clear consent to process their personal data for a specific purpose;
- Contract: the processing is necessary for a contract with the individual;
- Legal obligation: the processing is necessary to comply with the law (not including contractual obligations);
- Vital interests: the processing is necessary to protect someone's life.
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law; and We need all the categories of information in the list above primarily to allow us to comply with legal obligations. Please note that we may process information without knowledge or consent, where this is required or permitted by law.

Sharing Data

We may need to share your data with third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared unless it's the only way, we can make sure you stay safe and healthy, or we are legally required to do so.

We share pupil information with:

- Welsh Government and agencies acting on its behalf;
- Estyn;
- Other Schools that pupils have attended/will attend;
- Health providers and other statutory agencies;
- Welfare services (such as social services);
- Law enforcement officials such as police, HMRC;
- Local Authority Designated Officer;
- Professional advisors such as lawyers and consultants;
- Support services (including insurance, IT support, information security);
- Providers of learning software such as [Blooket, Gamemaker, Kahoot, Padlet etc] and
- The Local Authority (Bridgend County Borough Council);
- Civica;
- ParentPay;
- Unifrog;
- Bromcom;

- SMID Report; and
- TES (Classcharts)/Provision Map.

Information will be provided to those agencies securely or anonymised where possible.
The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.
We do not share information about our pupils with anyone without consent unless otherwise required by law.

Why we Share this Information
For example, we share students' data with the Welsh Government: Education and Skills Department on a statutory basis which underpins school funding and educational attainment.

Storing Pupil Data
The school keep information about pupils on computer systems and sometimes on paper.
Except as required by law, the school only retains information about pupils for as long as necessary in accordance with timeframes imposed by law and our internal policy.
Full details on how long we keep personal data for is set out in our data retention policy.

Retention Periods
Except as otherwise permitted or required by applicable law or regulation, the school only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.
Information about how we retain information can be found in our Data Retention policy.

Security
We have put in place measures to protect the security of your information (i.e., against it being accidentally lost, used, or accessed in an unauthorised way).

Biometric Data
At Porthcawl Comprehensive School we would like to use your information as part of an automated (i.e. electronically operated) recognition system. This is for the purposes of catering. The information that we wish to use is referred to as 'biometric information'. This data will only be processed once we have obtained appropriate consent. For further information in relation to this, please see our Biometrics Policy.

The National Data Collection (NDC)
The NDC is run by Welsh Government and contains information about pupils in schools in Wales. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Government. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities, and awarding bodies.
We are required by law, to provide information about our pupils to the Welsh Government as part of statutory data collections such as PLASC, post-16 data collection, national data collection and attendance collection.



To find out more about the NDC, go to https://gov.wales/national-data-collection-ndc-technical-completion-notes-schools-and-local-authorities
The Government may share or receive information about our pupils regarding curriculum assessments, exam results and attendance data. The Government are most likely to share data with the following organisations: -

- The local authority;
- Estyn;
- Careers Wales;
- Qualifications Wales and any body recognised by Qualifications Wales as a body awarding qualification in Wales (for example WJEC);
- The Office for National Statistics;
- The Education and Skills Funding Agency;
- The Office of Qualifications and Examinations Regulation (Ofqual) in England and any body recognised by Ofqual;

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

- who is requesting the data?
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.
Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's education record, contact the Headteacher.

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.

Requesting Access to your Personal Data

If you want to request information, please see our Subject Access Request policy, for the procedures we take.

Right to Withdraw Consent

In 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 Headteacher. 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.

Contact

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with the Headteacher in the first instance.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by the Headteacher, then you can contact the DPO on the details below:

Data Protection Officer:	Judicium Consulting Limited
Address:	72 Cannon Street, London, EC4N 6AE
Email:	dataservices@judicium.com
Web:	www.judiciumeducation.co.uk

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues at https://ico.org.uk/concerns.

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice 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.

