



SCHOOL and PRE-SCHOOL SETTING PRIVACY NOTICE

1... Background

1.1 This Privacy Notice sets out what the School, the Newbridge-on-Wye Pre-School Setting, the Local Authority (Powys County Council) and the Welsh Government do with the education-related information which they receive about children attending the School or the Setting and their parents / carers. It follows the model Powys County Council Privacy Notice (with adaptations for our School) and is intended to comply with the General Data Protection Regulation (GDPR).

1.2 The School is registered as a Data Controller no. Z6404426 on the Data Protection Register held by the Information Commissioner. The principal reason for processing data is to “provide education, training, welfare and educational support services”

1.3 Unless otherwise stated, the Pre-School Setting follows the procedures for processing data adopted by the School as its Data Controller.

1.4 The School collects information about children and their parents or carers when children apply for admission or enrol at the School. The School also collects information at other key times during the school year and may receive information from other schools or early years providers when children transfer.

1.5 The School processes the information it collects to administer the education which it provides to pupils. For example:

- the provision of educational services to individuals;
- monitoring and reporting on pupils'/children's educational progress;
- the provision of welfare, pastoral care and health services;
- the giving of support and guidance to children and young people, their parents and legal guardians;
- the organisation of educational events and trips and to inform about events and other things happening in the school
- to keep children safe (food allergies, or emergency contact details)
- the planning and management of the school

1.6 **Powys County Council** collects information about children and young people and their parents or carers when children and young people apply for admission to the School. It also has access to data collected by the School for the same reasons listed above and for the following additional purposes:

- to monitor, challenge and provide support to schools to improve performance and set credible targets
- to support schools in the services delivered to children and young people



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- to inform and support services provided by the Children and Young People's Partnership (CYPP) and the Powys Youth Service to young people and their families
- to carry out research and inform policy decisions including funding for schools and early years providers
- to monitor the quality and scope of data held by schools and provide support to ensure the data held about children and young people is accurate and up-to-date

Upon receipt of the information from the School, Powys County Council also becomes the Data Controller.

2. Legal Basis for Processing

2.1 We are entitled to process pupil and parent / carer information on the following grounds:

- a) Processing is necessary to comply with the legal obligations of the School.
- b) Processing is necessary for tasks in the public interest or exercise of authority vested in the School (the provision of education).
- c) Processing is necessary to protect the vital interests of the pupil.
- d) The parent / carer gives consent for one or more specific purposes

Each of these grounds of entitlement is recognised under Article 6 of the GDPR

2.2 Some of the information which the School processes is sensitive, or special, information and processing is justified on the grounds summarised below, which are recognised in GDPR Article 9.

- a) Processing is necessary for reasons of substantial public interest
- b) Processing is necessary to carry out the obligations or exercise rights of the School, the pupil or the parent/carers in the field of social protection law.
- c) Processing is necessary to protect the vital interests of the pupil or parent/carers.
- d) Processing is carried out (in circumstances stated) by a foundation or not-for-profit organisation (includes religious, political or philosophical organisations and trade unions)
- e) The parent/carers has given explicit consent for one or more specified purposes.

2.3 As Data Controllers, the School and Powys County Council use the information received for the purposes listed in paragraphs 1.5 and 1.6 to enable them to carry out data processing necessary for the performance of a task carried out in the public interest and in the exercise of official authority.



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2.4 In addition, the Welsh Government receives information on pupils directly from schools normally as part of statutory data collections 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

2.5 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).

3... Information held by the School and Powys County Council.

3.1 The types of personal information which will be held include:

- personal details such as name, address, date of birth, child/young person identifiers and contact details for parents and guardians; photographs
- characteristics (such as ethnicity, language, and free school meal eligibility)
- details about children's and young people's immigration status (this is used only to prepare summary statistical analyses);
- 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)
- assessment and attainment (such as key stage and results, post 16 courses enrolled for and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- information about the involvement of social services with individual children and young people where this is needed for the care of the child/young person



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- we may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Welsh Government.

4... Sharing of Information

4.1 Information held by the School and Powys County Council on children and parents / carers may also be shared with other organisations when the law allows and providing all appropriate steps are taken to keep the information secure, for example:

- other education and training bodies, including schools, when children and young people are applying for courses or training, transferring schools or seeking guidance on opportunities;
- bodies doing research for the Welsh Government, LA and schools as long as steps are taken to keep the information secure;
- central and local government for the planning and provision of educational services;
- social services and other health and welfare organisations where there is a need to share information to protect and support individual children and young people; including Police Forces, Courts and Tribunals and security organisations.
- Management Information System (MIS) providers in order to ensure that system functionality and accuracy is maintained;
- The Council's approved suppliers of the schools 'cashless' system to ensure all pupils, parents & guardians with parental responsibility and school staff are able to use it as appropriate;
- Powys Teaching Health Board to support the provision of an effective School Nurse Service and other related health services for young people and their families;
- FFT Education Research Trust (<https://fft.org.uk/about-fft/>) for the maintenance of the secure on-line FFT Aspire resource for schools enabling thorough self-evaluation using extensive progress measures and effective target-setting for pupil achievement;
- GL Assessment (<https://www.gl-assessment.co.uk/about-us/>) for the administration of annual cognitive ability tests (CATs) and other similar diagnostic tools to support individual learning;
- The South West and Mid-Wales Education Consortium (ERW) to support regional statistical analysis as required by Welsh Government;
- various regulatory bodies, such as ombudsmen and inspection authorities, where the law requires that information be passed on so that they can do their work;
- The Office of National Statistics (ONS) in order to improve the quality of migration and population statistics.



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4.2 Information is also shared with Careers Wales in accordance with the provisions laid down in The Education Act 1997 (Section 43 & 44) and The Learning & Skills Act 2000 (Sections 123 & 138).

4.3 Sharing personal information with curriculum-based software suppliers:-

(a) The School may provide limited personal (but not sensitive) information to external companies providing a curriculum-based resource (which may be on-line) which is deemed to have educational value. In these circumstances the School will ensure that all reasonable precautions are taken to preserve the security of the data in line with current legislation and that the external supplier meets all legal requirements regarding the handling of this data as specified in a formal written agreement between the School and the supplier.

(b) The School will endeavour to ensure that information is kept accurate at all times. Personal information will not be sent outside the United Kingdom unless it is protected by the enhanced security arrangements associated with the Welsh Government's digital learning platform – 'Hwb'. Details are available at: <https://hwb.gov.wales/privacy>

(c.) Companies and their applications currently used by the School in this way are:

- a) *Hwb Learning Platform, Welsh Government for storing pupils online work and completing online personal assessments as directed by the Welsh Government*
- b) *Seesaw Online Learning Logs used for evidencing learning and keeping photographic records of pupils progress*
- c) *Incerts, used for assessment and tracking purposes*
- d) *Teacher Centre, an online management information system (MIS) for schools and Local Authorities that has been developed over the last 10 years by the Systems Development team in Ceredigion. Used for registering pupils and holding personal data that is shared with the local authority.*

5. Keeping Information

5.1 The School, Powys County Council and Welsh Government will keep this data until the pupil's 25th birthday or for the duration of the criteria which



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underpin the statutory regulation. After this point the data will be anonymised in line with best practices and used only for statistical and research purposes.

5.2 Where applicable, the School will follow Powys County Council's Information Retention Schedule in retaining or destroying personal data.

6. Data Subject's Rights

6.1 Under data protection legislation, parents/carers and pupils have the right to request access to information about them which we hold, through a Subject Access Request (SAR). Primary school pupils are normally considered too young to fully understand their rights so we expect parents/carers to make any SAR on behalf of any child under 12,.

6.2 If you make an SAR and we hold information about you or your child, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

6.3 You also have the right to:

- ✓ Require the School or Powys County Council to put right any inaccuracies in the information;
- ✓ Object (in some circumstances) to processing on grounds relating to your particular situation;
- ✓ Restrict processing (in some circumstances)
- ✓ Lodge a complaint with the Information Commissioner who is the independent regulator for data protection.

6.4 If you wish to exercise your rights under the GDPR, please first contact the School.

Contact details:

School: Newbridge-on-Wye Church-in-Wales School
Newbridge-on-Wye



NEWBRIDGE-ON-WYE CHURCH-IN-WALES SCHOOL

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Phone:	Llandrindod Wells Powys LD1 6LD 01597 860273
Email Address:	office@newbridge.powys.sch.uk
Powys County Council:	Data Protection Schools Information Compliance Team County Hall Llandrindod Wells Powys LD1 5LG
Information Commissioner's Office:	Wycliffe House Water Lane Wilmslow, Cheshire SK9 5AF
Telephone - Helpline:	029 2067 8400 (Wales helpline) or 0303 123 1113 (UK helpline)
Website:	www.ico.org.uk

Adopted by the Governing Body in place of previous GDPR Privacy Notice

November 2018

Signed	H.A. Nixon Head Teacher and School Data Controller
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Signed	Lorraine Jenkin Chair of Governors
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Signed	M. Havard-Pratt Leader, Pre-School Setting
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