

## Privacy Notice (Secondary Schools)

### The categories of pupil information that we process include the following non-exhaustive list:

- personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- characteristics (such as ethnicity, language, and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs
- 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 post 16 courses enrolled for and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- information about attendance on school trips and activities (safety issues and risks for keeping a pupil safe, emergency contact details; next of kin)
- food allergies (for catering)

We are also in the process of updating the School website on the type of information we process.

### Why we collect and use pupil information

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

- a) to support pupil learning
- b) to monitor and report on pupil attainment progress
- c) to provide appropriate pastoral care
- d) to assess the quality of our services
- e) to keep children safe (food allergies, or emergency contact details)
- f) to meet the statutory duties placed upon us by the Welsh Government with regard to data collection.
- g) to communicate effectively with parents and carers.
- h) to enable pupils to move from one educational setting to another seamlessly, or where we have co-operation arrangements with other schools, for delivery of local curricular entitlements.

## Lawful basis to process data

Under the UK General Data Protection Regulation (GDPR), the lawful bases we rely on for processing pupil information will usually be the following:

- As data controller, the School uses the information received for the purposes listed above to enable us 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 or where we have a legal obligation to process.
- In addition, concerning any 'special category data', where the processing is necessary for reasons of substantial public interest; or where we have obtained explicit consent.

## How we collect pupil information

We collect pupil information via admission forms or registration forms completed at the start of school years; via 'common transfer files', or file transfer from a previous school.

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the data protection legislation, 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.

## How we store pupil data

We hold pupil data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please visit the school website for the latest information. We are required to retain certain educational information until a pupil's 25<sup>th</sup> birthday for example.

## Who we share pupil information with

We routinely share relevant pupil information with:

- schools that the pupils attend after leaving us
- our local authority
- Youth support services
- Welsh Government

- NHS /school nurse; either directly or via the local authority such as for immunisation programmes.
- Examination Boards e.g. WJEC, OCR, Pearson, AQA, Agored Cymru
- Agencies and third-party suppliers providing functions on our behalf.

## Why we regularly share pupil information

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so. Where appropriate we will aim to have a formal Information Sharing Protocol in place and have made a commitment to developing these in accordance with national standards laid down by the Welsh Government's Wales Accord on the Sharing of Personal Information (WASPI) see [www.waspi.org](http://www.waspi.org)

## Youth support services

We also pass pupil information to our local authority and / or providers of youth support services, under the Learning and Skills Act 2000 and the Learning and Skills (Wales) Measure 2009, as they have responsibilities in relation to the education or training; from aged 11 to 19.

This enables them to provide services as follows:

- youth support services
- careers advisers
- post 16 education and training providers

Pupil information includes personal identifiers and contact information (e.g. name, address, date of birth, home telephone number). In order to ensure that career advice and guidance is provided to young people who may be underrepresented in employment & training, characteristics such as gender, ethnicity and ALN status may also be shared in some circumstances.

Data is securely transferred to the youth support service and held for in accordance with the Data Protection Act 2018. The receiving organisation e.g. Careers Wales, will then become the Data Controller in respect of the sent information and will provide you with any privacy or fair processing information directly.

## Welsh Government

The Welsh Government collects personal data throughout a pupil's school life from educational settings and local authorities via various statutory data collections such as:

- 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
- Post 16 data collection

In addition to the data collected as part of PLASC, the Welsh Government and Local Authorities also receives 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).

We are required to share information about our pupils with the Welsh Government either directly or via our local authority for the purpose of those data collections, under The Pupil Information (Wales) Regulations 2011.

Why do we share this data with the Welsh Government?

The pupil data that we lawfully share with the Welsh Government 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)

All data is transferred securely and held by the Welsh Government under a combination of software and hardware controls.

For more information, please visit the Welsh Government website

[www.gov.wales/school data](http://www.gov.wales/school-data) and in particular the privacy notice entitled:

<https://gov.wales/sites/default/files/publications/2020-09/privacy-notice-for-statutory-pupil-data-collections.pdf>

## Requesting access to your personal 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 educational record, please contact the school office directly.

In certain circumstances you also 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

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/make-a-complaint/>

## Contact

If you would like to discuss anything in this privacy notice, please contact:

Data Protection Officer for Schools, whose contact details are :

**Legal Services Manager** [dataprotection@denbighshire.gov.uk](mailto:dataprotection@denbighshire.gov.uk)

Legal, HR and Democratic Services, Denbighshire County Council  
County Hall, Ruthin, Denbighshire. LL15 1YN

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