



Privacy Notice – Ysgol Bro Gwaun

This privacy notice covers how Ysgol Bro Gwaun (as a Data Controller) will collect, use and share your personal data for the purposes of providing a successful education to children.

Why we need your information (purpose of processing)

We collect and use your personal information so that we can provide a safe, supportive and effective learning environment.

The information that you provide will be processed according to the UK General Data Protection Regulation, the Data Protection Act 2018, Local Government Act 2000 (Section 2), The Government of Wales Act 2006 (Section 60), Learning & Skills Act 2000 (Sections 33, 40, 138 & 140), Education Act 2004, SEN Code of Practice for Wales, Employment and Training Act 1973 (Sections 8, 9 & 10), The Education (Information about Individual Pupils (Wales) Regulations 2007, Frameworks such as Youth Engagement and Progression Framework, Special Educational Needs and Disability Act 2001, Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) and the Management of Health and Safety at Work Regulations 1999.

We will also make any disclosures required by law and we may also share this information with other bodies responsible for detecting/preventing fraud/crime or auditing/administering public funds to ensure money is targeted and spent in the most appropriate and cost-effective way. In order to achieve this, information will be shared with our Audit Service within Pembrokeshire County Council and with The Auditor General for Wales ([Audit Wales Privacy and Cookie Policy](#)).

We will not make any disclosures to third parties for marketing purposes.

Your data will be secure and confidential at all times, and we will only collect the personal information that is required to provide you with our service.

What personal data is being collected?

The categories of personal data being collected are:

Pupil Records, ALN & Register:

- Names, address, DOB, contact details, UPN numbers, sibling details if in same School, religion, ethnicity, medical records, allergies, dietary requirement, photos, free school meals, whether looked after child, potentially criminal conviction data via safeguarding reports.

CCTV:

- Images/video

Photos/Videos:

- Images/audio

Staff Records:

- Names, contact details, health data/sickness record, DOB, contract of employment, references, has DBS check?

Visitor Sign in:

- Name and reason for visit, photo, contact information and car registration

Accident & Incident Reporting:

- Name, details of injury, date, time, place of incident

Business Continuity Plan:

- Name, emergency contact details

What is our lawful basis for processing your personal data?

The UK General Data Protection Regulations (UK GDPR) requires specific conditions to be met to ensure that the processing of your personal data is lawful. These relevant conditions are below:

- Article 6 (1)(b) Contract: the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract.
- Article 6 (1)(e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- Article 6 (1)(f) Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Some types of personal data are more sensitive than others and need more protection. This is classed as 'special category data' and could include information about your racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership and the processing of genetic or biometric data, health and sex life and sexual orientation.

We process this type of special category data as it is necessary for reasons of:

- Article 9 (2)(b) Carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law.
- Article 9 (2)(g) Substantial public interest.

(The relevant Data Protection Act 2018 conditions are – Schedule 1 Part 2: Statutory and government purposes)

The Schedule 1 condition for processing criminal offence data is: Safeguarding of children and individuals at risk.

Who will we share your information with?

We may need to share your personal data with internal departments of the Council, other organisations and third parties, this will include:

- Pupil Records, ALN & Register: **School Management Information System (SIMS)**; Edukey inc. Class Charts, Safeguard my School, Provision Map; **Local Authority** inc. Leisure Centres, Social Services, Team Around the Pupil Parent and Setting (TAPPAS); **Welsh Assembly Government** inc. PLASC, Hwb, Youth Engagement and Progression Framework, Data Exchange Wales Initiative (DEWI); **National Health Service (NHS)**; **External Advisory Teachers**; **Evolve** (school trips); **Primary & Secondary Schools** (transition purposes); S2S Data Transfer system; **Haven Systems** (school meals); **School Nurse**; **Wonde**; **Class Dojo**; **Power BI**; **Darllen Co**; **Urdd**; **Carousel Learning**; **Nessy**; **Clicker**; **GroupCall Xporter**; **GL Assessment**; **Youth Support Services**; **Colleges of Further Education and Work Based Trainers**; **Examination Bodies**; **Careers Wales**; **The Learning Record Service (LRS)**; **Learning Curve Group**; **Police**; **Really Pro Ltd**; **Time Tables Rock Stars**; **Estyn**; **MathsWatch**; **Libresoft**; **SMID**; **NoMoreMarking**; **Across Cultures (Learning Village)**;
- CCTV: **Police**; **Dyfed Alarms**; **Local Authority**

- Photos and Videos: **Hwb; Social Media; Local Media** and potentially **National Media; School Website; Class Dojo; School Newsletter**
- Staff Records: **Local Authority; Hwb; School Management Information System (SIMS); WJEC; Education Workforce Council (EWC); Police; Governors; Other bodies for reference purposes; Estyn; Microsoft Office 365; Google Workspace for Education; SchoolCloud Room Booking System**
- Visitor Sign In: **EntrySign; Governors; School**
- Accident & Incident Reporting: **Hwb; Local Authority Health & Safety department** (Evotix Accident Reporting Software); **Edukey**
- Business Continuity Plan: **School Management Information System (SIMS); Governors; Local Authority**

We use data processors (third parties) who provide services to us in terms of IT provision and disaster recovery. We have contracts in place with these data processors and they cannot do anything with your personal information unless we have instructed them to do it. They will hold your data securely and your personal information will only be shared in accordance with UK GDPR. When it is necessary for your personal information to be transferred outside of the UK as part of these contracts, this will only be done in accordance with the UK GDPR.

Ysgol Bro Gwaun has a duty to protect the public funds it manages. Therefore, the information that you have provided to us may be used for the prevention and detection of fraud and for auditing purposes both internally and externally.

The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance, or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found by visiting [CIFAS](#).

How long do we keep hold of your information?

Ysgol Bro Gwaun will only keep your information for as long as is necessary, we will retain the information provided to us for:

Pupil Records, ALN & Register: Until the Pupil is 25 years of age, but where a Pupil has a Statement of Educational need or a School/LA IDP, until the pupil reaches 31 years of age.

CCTV: 30 days

Photos/Videos: Indefinitely; Examination related materials – until the closing date of reviews of moderation for the series concerned or until any appeal, malpractice or other results enquiries have been completed (JCQ ICC 12.4 & 21.2)

Staff records: 7 years

Visitor Sign in: 1 year (Photo and Signature only retained for 30 days)

Accident & Incident Reporting: Adult – 6 years, Pupil – as per their retention period

Business Continuity Plan: For duration of staff employment and whilst pupil enrolled

Your information will be securely disposed of once it is no longer required.

Your Rights

Under the UK General Data Protection Regulation and Data Protection Act 2018, you have rights as an individual including:

- The right to **Rectification** – you have the right to ask to have your information corrected.
- The right to **Restrict** processing may apply – you may request that we stop processing your personal data however, this may delay or prevent us delivering a service to you. We will seek to comply with your request but may be required to hold or process information to comply with our legal duties.
- The right to **Object** – this is not an absolute right and will depend on the reason for processing your personal information.
- The right to **Erase** - you may request that we erase your personal data however, this may delay or prevent us delivering a service or continuing to deliver a service. We will seek to comply with your request but may be required to hold or process information to comply with our legal duties.
- The right to not be subject to **Automated decision making and profiling**.
- The right of **Access** – you have the right to ask us for copies of your personal data. To make a request, please contact:

Access to Records
Pembrokeshire County Council
County Hall
Haverfordwest
SA61 1TP

Email: accesstorecords@pembrokeshire.gov.uk

Telephone: 01437 764551

Complaints or Queries

Ysgol Bro Gwaun 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. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below:

Data Protection Officer
Ysgol Bro Gwaun
Heol Dyfed
Fishguard
Pembrokeshire, SA65 9DT

Email: office@ysgolbrogwaun.com

Telephone: 01348 872268

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:

Information Commissioner's Office – Wales
2nd Floor, Churchill House
Churchill Way
Cardiff
CF10 2HH

Email: wales@ico.org.uk

Telephone: 0330 414 6421

Our Contact Details as Data Controller are:

Ysgol Bro Gwaun
Heol Dyfed
Fishguard
Pembrokeshire, SA65 9DT

Email: office@ysgolbrogwaun.com

Telephone: 01348 872268

Our Data Protection Officer's information is detailed above in the Complaints and Queries section.

Changes to this privacy notice

We keep our privacy notice under regular review.