



Privacy Notice - Education – TAPPAS

This privacy notice covers how Pembrokeshire County Council (as a Data Controller) will collect, use and share your personal data for the purposes of TAPPAS (Team Around the Pupil, Parent And Setting).

TAPPAS is a group of professionals that supports schools and families in the wellbeing and additional learning needs of children and young people, providing practical early help and support.

TAPPAS are termly meetings attended by a range of multi- disciplinary professionals, including from the local authority, the NHS, and other organisations which support children and young people.

Key Principles of TAPPAS:

Supporting schools and families in the early identification of pupils with ALN and the implementation of interventions and tracking of pupils.

Why we need your information (purpose of processing)

We use your personal information so that we can determine the support and additional learning needs of the named child or young person (CYP).

The information that you provide will be processed according to the UK General Data Protection Regulation, the Data Protection Act 2018 and Additional Learning Needs and Education Tribunal (Wales) Act.

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 \(opens in a new tab\)](#)).

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?

For this service, we are provided with information directly from the school or educational setting (including post 16 providers) that the CYP (Child or Young Person) is attending:

- CYP's (Child or Young Person's) date of birth
- Whether a child is Looked After
- School attendance and educational attainment
- Information about the CYP's (Child or Young Person's) health, abilities and skills
- Limited information about criminal offences/convictions will also be obtained from the Council's Youth Offending team, where this is relevant and needed to inform the Local Authority if they have a duty to decide if the child or young person has ALN (Additional Learning Needs).

We may be provided with medical information from NHS local health boards as part of this service.

We may also ask Children's Services and Inclusion Service professionals for advice, including their involvement with a CYP.

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)(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. The ALNET Act requires Local Authorities to determine ALN and ALP 'when it is raised to their attention that CYP has, or may have' additional learning needs.

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)(g) Substantial public interest. (The relevant Data Protection Act 2018 condition is – Schedule 1 Part 2: Statutory and government purposes)

The Schedule 1 condition for processing criminal offence data is: Statutory and government purposes.

Who will we share your information with?

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

- Young Person
- Parent/ Guardian
- Inclusion Managers, including the Early Help team (Internal)
- Behaviour Support Service (Internal)
- Outreach Workers (Internal)
- Sensory and EAL service (Internal)
- Educational Psychologist Service (Internal)
- Additional Learning Needs Advisory Teachers (Internal)
- Family Liaison Officers
- Head teachers
- ALNCOs (Additional Learning Needs Co-Ordinator), this can be from schools which the CYP (Child or Young Person) does not attend.
- Local Health Board(s)
- Early Years Play and Childcare Service
- LA IDP Panel and Specialist Placement Panel
- Further Education Institutions & Post 16 providers
- Youth Service and other commissioned providers of local authority services

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.

Pembrokeshire County Council 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 \(opens in a new tab\)](#).

How long do we keep hold of your information?

Pembrokeshire County Council will only keep your information for as long as is necessary. We will retain the information provided to us for 25 years after your child's date of birth is unless it is subject to legal action, you and your child's information will be securely destroyed after this period.

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 **Erasure** - 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

Pembrokeshire County Council 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

Pembrokeshire County Council

County Hall

Haverfordwest

SA61 1TP

Email: dataprotection@pembrokeshire.gov.uk

Telephone: 01437 764551

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 No: 0330 414 6421

Our Contact Details as Data Controller are:

Pembrokeshire County Council, County Hall, Haverfordwest, Pembrokeshire, SA61 1TP.

Telephone number: 01437 764551 or enquiries@pembrokeshire.gov.uk

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.