

## **Portfield Special School Privacy Notice**

In accordance with the General Data Protection Regulations (GDPR) which come into force on 25 May 2018, this notice sets out what Portfield Special School does with the education related information that it receives about Children and Young People.

The information in this notice will be kept under review to incorporate any further changes communicated by the Information Commissioner's Office.

### **Background**

Portfield School collects information about children and young people and their parents, carers or legal guardians when children and young people join our 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 and young people transfer.

**Portfield Special School** processes the information it collects to administer the education it provides to children and young people. 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;
- the planning and management of Portfield Special School.

**Pembrokeshire County Council** collects information about children and young people and their parents, carers or legal guardians when children and young people apply for admission to our school. The local authority also has access to data collected by Portfield Special School for the same reasons listed above and for the following additional purposes:

- to monitor, challenge and provide support to schools and early years' providers to improve performance and set credible targets
- to support schools and early years' providers in the services delivered to children and young people
- to inform and support services provided by the Children and Young People's Partnership (CYPP) and the Pembrokeshire 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 early years' providers 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 our school or early years' provider the Local Authority (Pembrokeshire County Council) becomes the Data Controller.

As data controllers, Portfield Special School and Pembrokeshire County Council use the information received for the purposes listed above 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

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

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).

Upon receipt of the information from our school or the Local Authority, the Welsh Government becomes the data controller.

### **What information is held by Portfield Special School?**

The sort of personal information that will be held includes:

- personal details such as name, address, date of birth, child/young person identifiers and contact details for parents and guardians;
- information on any additional learning needs;
- information on performance in internal and national assessments and examinations;
- information on the ethnic origin and national identity of children and young people (this is used only to prepare summary statistical analyses);
- details about children's and young people's immigration status (this is used only to prepare summary statistical analyses);
- medical information needed to keep children and young people safe while in the care of Portfield Special School;
- information on attendance and any disciplinary action taken;
- 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

### **Who does Portfield Special School share your information with?**

Information held by Portfield Special School on children and young people, their parents, carers or legal guardians 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/Early Years providers 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;
- 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;
- Hywel Dda Health Board to support the provision of an effective School Nurse Service and other related health services for young people and their families;
- 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;

From time to time, we will ask for permission from both parents and students to use photographs and video images of the students in school publicity. All students aged 13 and above will be eligible to give their consent, along with a parent, carer or guardian. It should be noted that this content may be withdrawn at any time. A copy of the school consent form may be downloaded from this site.

#### Sharing personal information with curriculum-based software suppliers

Portfield Special 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.

Portfield Special 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:  
<http://gov.wales/topics/educationandskills/publications/guidance/information-governance-guidance-for-schools/?lang=en>

#### **Companies and their applications currently used by the school in this way are:**

1. *HWB Microsoft Office 365 – Emails, Sharepoint, Onedrive, Teams. Allows for collaborative working inside and outside school as well as Archiving and small factor databases.*
2. *Teacher Centre– The school's core Information Management System – holds all core student data including contact information and results.*
3. *Seesaw - Communication with parents and carers*
4. *SCHOOP – Communication with parents and carers*
5. *EduKey – Recording pupil data for monitoring purposes*
6. *SOLAR – Pupil data for monitoring purposes*
7. *Eduspot – Recording pupil and staff data*
8. *CCTV – Provides building security and evidence if damage occurs – Inhouse solution with onsite monitoring*
9. *Examination Bodies – WJEC, Agored– Provides GCSE/GCE based awards/courses.*
10. *Haven Systems software – PCC provided Canteen till system – includes student information, picture age, dietary needs, balance on account, meals chosen by students for procuring meals.*
11. *PurpleMash – Software package for use by pupils*

## What information is received by Welsh Government?

Personal and special category information that will be collected and held includes:

- Some personal information about you, such as:
  - Name
  - Address
  - Date of birth
  - Gender
  - Ethnic group
  - Disability status
  - other health information
- Information on any additional learning needs;
- Information on performance in national assessments and examinations;
- Information from your school about your education
- Information on attendance

## What is Welsh Government doing with your information?

As data controller, the Welsh Government uses the information received for the below purposes 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:

<p>For school performance reporting purposes, identifiable data will be shared back with the relevant schools.</p> <p>For statistical and research purposes which will help to inform, influence and improve education policy for the with planning services for people in Wales. To monitor the performance and how well the education services are being provided so that they can be improved. To help monitor and target funding effectively. For publication purposes which includes a range of statistical outputs on the Welsh Government website.</p> <p>School information published on My Local School website.</p> <p>Production of school and local authority level analysis for schools, LA's and consortia.</p> <p>Link with other datasets, including non-educational data sets, in order to inform wider education and social policies. Examples of data sets that we may link include data on students in further or higher education institutions, or employment and welfare data from The Department of Work and Pensions. We will</p>	<p><u>No</u> action will be taken in relation to you personally.</p> <p>Information will <u>not</u> be shared or combined in a way that could lead to you being identified, unless we are legally able to do so.</p> <p><u>No</u> data could ever be published that would identify individual pupils.</p>
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only link data sets where the law allows us to do so.	
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For research purposes wider than education we will use techniques that ensure the data are anonymized before any research takes place.	
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A full list of Welsh Government statistical publications can be viewed at:

[www.statswales.gov.wales](http://www.statswales.gov.wales)

### **Who does Welsh Government share your information with?**

Information held by the **Welsh Government** about children and young people, their parents, or legal guardians, may be shared upon request and where the law allows, with organisations linked to education and training and specified in Regulations made under section 537A of the Education Act. The Welsh Government will only share or link data where there is a legal requirement to do so.

Persons or Organisations Welsh Government share your personal information with:

- The local authority that maintains the school at which a pupil is or was registered
- The Office of Her Majesty's Chief Inspector of Education and Training in Wales (Estyn)
- Careers Wales
- Qualifications Wales
- Any body recognised by Qualifications Wales as a body awarding qualifications in Wales
- The Office for National Statistics
- The Education and Skills Funding Agency
- Any persons conducting research into the educational achievements of pupils and who require individual pupil information for that purpose
- Information collators which, for the purposes of or in connection with the functions of the Welsh Ministers relating to education, is responsible for collating or checking information relating to pupils

Welsh Government will only provide data for a specific purpose and for a limited time period, after which the organisation must confirm that it has been destroyed.

Any analysis produced must follow Welsh Government disclosure rules to ensure that individual pupils cannot be identified.

For research purposes wider than education, Welsh Government will use techniques that ensure the data are anonymised before any research takes place. Sharing of anonymised data is outside of the GDPR. Further information can be found on the Welsh Government website at:  
[www.gov.wales/School Data](http://www.gov.wales/School Data)

### **How long will this data be kept?**

Portfield Special School will keep this data until the pupil's 25<sup>th</sup> birthday or for the duration of the criteria which underpin the statutory regulations. After this point the data will be anonymised in line with best practices and used only for statistical and research purposes.

### Your rights under the GDPR

You have the right to:

- Have access to the personal data that Portfield Special School, Pembrokeshire County Council and Welsh Government are processing about you;
- Require these organisations to rectify inaccuracies in that data;
- The right (in some circumstances) to object to processing on grounds relating to your particular situation;
- The right to restrict processing (in some circumstances)
- Lodge a complaint with the Information Commissioner who is the independent regulator for data protection.

For further information about the information which Portfield Special School, Powys County Council or Welsh Government holds and its use, or if you wish to exercise your rights under the GDPR, please see contact details below:

Portfield Special School:	Paul Hughes - Headteacher
Tel:	01437 762701
Email Address:	admin.portfield@pembrokeshire.gov.uk
Pembrokeshire County Council:	Data Protection Officer – Jo Hendy
Tel:	01437 764551
Email:	DataProtection@pembrokeshire.gov.uk
Welsh Government:	Welsh Government Cathays Park CARDIFF CF10 3NQ
Tel:	029 2082 3650

Email Address:	Data.ProtectionOfficer@gov.wales
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To contact the Information Commissioner's Office, please see details below:

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:	<a href="http://www.ico.org.uk">www.ico.org.uk</a>

P Hughes

Headteacher

April 2019