



Working together to provide excellent learning experiences  
*Cydweithio i ddarparu profiadau dysgu ardderchog*

**Headteacher: Mrs. J. Cooper**  
**Deputy Head: Mr. C. Ellis**  
Assistant Heads  
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## ALUN SCHOOL PRIVACY NOTICE FOR PARENTS AND GUARDIANS

To meet the requirements of the Data Protection Act 2018 and GDPR, schools are required to issue a Privacy Notice to pupils and/or parents summarising the information held on record about pupils, why it is held, and the third parties to whom it may be passed on. This Privacy Notice provides information about the collection and processing of pupils' personal and performance information by the Alun School.

**The Information Commissioner's Office (ICO)** is the Regulator for how personal information is used. They have the powers to enforce Data Protection legislation. If you have any concerns they will provide advice and will handle any complaints, you may have. Advice and guidance is available via their website [www.ico.org.uk](http://www.ico.org.uk)

**Data Protection Officer (DPO)** The school has a Data Protection Officer who is independent from the school and provides advice to the school and The Governing Body on complying with privacy and data protection legislation (the General Data Protection Regulation and Data Protection Act 2018). Our Data Protection Officer will liaise with ICO when required. Our Data Protection Officer is provided by an independent consultancy. If you have any questions he may be contacted via [www.gdbr.co.uk](http://www.gdbr.co.uk) or [david@gdbr.co.uk](mailto:david@gdbr.co.uk)

**The Governing Body** For the purposes of the General Data Protection Regulations and the Governing Body is recognised as The Data Controller (further information about the roles of the Data Controller is available from the ICO) and is ultimately responsible for how information is collected used and shared. It is also responsible for implementing advice and guidance issued by the DPO. The Chair of Governors may be contacted c/o Mrs. Amanda Flint at [amanda.flint@alun.flintshire.sch.uk](mailto:amanda.flint@alun.flintshire.sch.uk)

**The Headteacher** is responsible for the day to day management of how personal information is collected, used and shared.

### How we use your information

The **school** processes the information it collects to administer the education it provides to pupils. For example, where necessary we use personal information to:

- Provide education, training, welfare and educational support services
- Monitor and report on pupils' educational progress
- Provide welfare, pastoral care and health services
- Give support and guidance to pupils, their parents and legal guardians
- Organise educational events and trips
- Administration for the planning and management of the school
- Maintain our accounts and records
- Carry out Fundraising
- CCTV to monitor visual images for security, the prevention and detection of crime

## **We collect and process the following types of information relating to the above reasons and purposes**

- Name & personal details such as name, address, date of birth, pupil identifiers and contact details for parents and guardians
- Family links
- Student records from previous academic establishments
- Visual images, personal appearance and behaviour
- Information on performance in internal and national assessments and examinations
- Information on the ethnic origin and national identity of pupils (this is used only to prepare summary statistical analyses)
- Details about pupils' immigration status (this is used only to prepare summary statistical analyses)
- Medical information needed to keep pupils safe while in the care of the school
- Information on attendance and any disciplinary action taken; information about the involvement of social services with individual pupils where this is needed for the care of the pupil.

## **We may also collect and use the following special category information**

- Physical or Mental Health
- Racial or ethnic information
- Religious or other beliefs
- Offences or alleged offences

## **We collect this information from**

We collect this information from you, and our partner organisations such as Flintshire County Council, other Local Authorities and Primary Schools.

## **Where necessary or required we may share information**

Information may be shared with other organisations and partners that provide services on our behalf or on behalf of our pupils such as Careers Wales, GWE (Regional Education Service), Flintshire County Council and schools where pupils move to. The information provided is only the minimum necessary to enable them to provide services to you. We share information with:

- Education training and examining bodies
- School staff and the Governing Body
- Family, Carers and associates
- Healthcare professionals
- Social and Welfare Bodies
- Local Authorities
- Welsh Government
- Police Forces
- Courts
- Business Associates; Catering providers, parent pay
- Financial Organisation
- Security Organisations
- Learning Records Service
- Careers Wales
- GWE (Regional Education Service)
- Capita (Schools Information Management System)

- Press and Media

These organisations are required to retain your information in a secure manner and only use it to undertake the services they provide to you. The School is also required **by law** to protect the public funds it administers and may share information provided to it with other bodies responsible for auditing or administering public funds in order to prevent and detect fraud. More information is available from the [National Fraud Initiative website](#).

### **Welsh Assembly Government & Local Education Authority (LEA)**

The Welsh Assembly Government receives information on pupils normally as part of what is called the Pupil Level Annual Schools' Census (PLASC). The Welsh Assembly Government uses this personal information for research (carried out in such a way that ensures individual pupils cannot be identified) and for statistical purposes, to inform, influence and improve education policy and to monitor the performance of the education service as a whole. Examples of the sort of statistics produced can be viewed at [www.wales.gov.uk/statistics](http://www.wales.gov.uk/statistics).

The LEA also uses the personal information collected via PLASC to do research. It uses the results of this research to make decisions on policy and the funding of schools, to calculate the performance of schools and help them to set targets. The research is carried out in such a way that ensures individual pupils cannot be identified.

In addition, the Welsh Assembly Government and LEAs receive information regarding National Curriculum assessment and Public Examination results and attendance data at pupil level.

### **Transfers**

Information is not transferred out of the United Kingdom however some information may be stored on Cloud Servers based in the EEA.

### **The Lawful Basis for collecting information**

Information is collected on the basis we have a legal obligation to provide education service (Article 6(1)(b) General Data Protection Regulation

The task we carry out is a Public task in the Public Interest (Article 6(1)(e,))

- Fundraising Activities are carried out
  - With your consent
    - Article 6(1)(a)
- Or where we have a legitimate interest
  - Article 6(1)(f)

### **We apply the following principles where we use personal information**

- a) processed lawfully, fairly and in a transparent manner
- b) collected for specified, explicit and legitimate purposes ('purpose limitation');
- c) adequate, relevant and limited to what is necessary
- d) accurate and, where necessary, kept up to date;
- e) kept in a form which permits identification of data subjects for no longer than is necessary
- f) processed in a manner that ensures appropriate security of the personal data,

### **Your Rights**

The Regulation recognises 8 rights dependent on the lawful basis for processing

- Right to be informed
- Rights of access
- Right to rectification
- Right to erasure
- Right to restrict
- Right to Portability
- Right to object
- Rights over automated decision making & profiling

This notice forms part of your right to be informed.

Where information is used under Public Task you have the right to be informed, the rights to object and rectify.

Under Consent all 8 rights are valid

### **How we look after your information**

Under the General Data Protection Regulations, we must to protect any information that we collect from you. We take measures to safeguard your data and apply security standards and controls to prevent any unauthorised access to it. Information which you have provided will be stored securely. It will only be used for the purpose(s) stated when the information was collected.

### **How long we retain information**

How long we keep the information before it is securely disposed of varies depending on the type of information, legal requirements and school need. The school uses guidance provided by the Information Toolkit for Schools (provided by the Information & Records Management Society) and in some instances our Data Protection Officer may also provide advice on how long it is appropriate to keep types of information.

### **Access to information and correction**

Under the data protection Act you have a right to request a copy of some or all of your personal information we hold about you. We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. Please help us to make sure that we have identified you correctly by letting us know when you change address or name, and tell us if any of your information we hold is wrong.

If you wish to request your information, update or correct your information please contact Mrs. Amanda Flint at [amanda.flint@alun.flintshire.sch.uk](mailto:amanda.flint@alun.flintshire.sch.uk)

If you have any questions or queries you can contact our Data Protection Officer, Mr. David Bridge, directly at [david@gdbr.co.uk](mailto:david@gdbr.co.uk)

Alun School is required to maintain class/bubble lists in response to the Covid-19 health emergency. The lists contain each pupils name along with the parents/guardians name and telephone number. The processing of the class/bubble lists is necessary as part of our public task as set out in the Operational Public Health Advice Note for Welsh Government on the investigation and management of clusters and incidents of COVID-19 in educational and childcare settings.

Alun School will retain your data for as long as the child remains a pupil within the school or until the pandemic ends, whichever is sooner.

In the event of a positive Covid-19 case within the school, the class/bubble list will be shared with NHS Wales Test, Trace, Protect.

If you feel that Alun School has mishandled yours or your child's personal data at any time you can make a complaint following the procedures below.

### Complaints

If you wish to complain about how we use your information you may contact the school or the Data Protection Officer. You also have the right to complain to the Information Commissioners Office [www.ico.org.uk](http://www.ico.org.uk)

Alternatively, you can make a complaint to the Information Commissioners Office by visiting their website (<https://ico.org.uk/make-a-complaint/>) or by calling their helpline on 0303 123 1113.

### Changes to our privacy policy

We keep our Privacy Policy under regular review and will publish any revisions on our website.

Data Protection Officer Welsh Government Cathays Park CARDIFF CF10 3NQ		Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF
Email Data.ProtectionOfficer@gov.Wales		
School Data Protection Officer GDBR Consultancy Ltd David Bridge david@gdbr.co.uk		
		Wales helpline: 029 20678400 <a href="http://www.ico.gov.uk">www.ico.gov.uk</a>
		Head Teacher Mrs. J. Cooper Alun School <a href="mailto:school@alun.flintshire.sch.uk">school@alun.flintshire.sch.uk</a>
		School Data Protection liaison Mrs. A. Flint <a href="mailto:amanda.flint@alun.flintshire.sch.uk">amanda.flint@alun.flintshire.sch.uk</a>