

# KING HENRY VIII SCHOOL

*Ysgol Brenin Harri'r VIII*



*UT PROSIM*

## PRIVACY NOTICES

*Hysbysiadau preifatrwydd*

*Approved by the Governing Body  
on 2<sup>nd</sup> July 2018*

*Review: Annually*

Headteacher/Prifathro: Mrs E Lewis BA (Hons) MA Ed

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Abergavenny  
NP 7 6EP

Tel: 01873 735373

Our school aims to ensure that all personal data collected about staff, pupils, parents/legal guardians, governors, visitors and other individuals is collected, stored and processed in accordance with the General Data Protection Regulation 2016 (GDPR 2016) and the Data Protection Act 2018 (DPA 2016) as set out in the [Data Protection Bill](#). This set of Privacy Notices explain how we collect, store and use personal data.

We, King Henry VIII School are the 'data controller' for the purposes of data protection law.

Our Data Protection Officer is Stuart Mullaney.

## **COMPLAINTS**

If you have any concerns or complaints about how we obtain, use, store or share your personal data, please contact the Data Protection Officer.

If however you are dissatisfied with our response to your concerns you can contact the Information Commissioners Office:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone: 0303 123 1113 (local rate) or 029 2067 8400

Website: [www.ico.org.uk](http://www.ico.org.uk)

## **FURTHER INFORMATION**

If you would like further details about how we collect and use information, please review our Data Protection Policy 2018, which can be found on our website.

## **CONTACT**

If you would like to discuss anything in this privacy notice, please contact the Data Protection Officer:

Name: Stuart Mullaney

Address: King Henry VIII School, Old Hereford Road, Abergavenny, Monmouthshire, NP7 6EP

Telephone: 01873 735318

Email: [mullaney@khs.schoolsdu.org.uk](mailto:mullaney@khs.schoolsdu.org.uk)

**PRIVACY NOTICES**

Privacy Notice for Parents – Using your child’s data .....	4
Privacy Notice for Parents – Using your data .....	9
Privacy Notice for Pupils – An easy guide for pupils .....	13
Privacy Notice for Workforce including Volunteers and the Governing Body.....	17
Privacy Notice for People Captured on CCTV .....	23

**The category of pupil information that we collect, hold and share (process) include:**

- personal identifiers and contacts (such as name, unique pupil number, contact details, address and family circumstances)
- characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- additional learning needs (including the needs and ranking)
- 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 the Welsh Tests and school reports)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- Photographs
- CCTV images

**Why we collect and use pupil information:**

- to support pupil learning
- to monitor and report on pupil attainment progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to keep children safe (such as food allergies and emergency contact details)
- to publicise activities and celebrate achievements
- to comply with the law regarding data sharing and to meet the statutory duties placed upon us (for example, Welsh Government data collection)

**Under GDPR 2016, the lawful bases we rely on for processing pupil information are:**

Personal Data We Hold	Processing Activity	Lawful Basis (Article 6 of GDPR 2016)
Personal identifiers and contacts (such as name, unique pupil number, contact details, address and family circumstances)	<ul style="list-style-type: none"> <li>● to comply with the law regarding data sharing and to meet the statutory duties placed upon us (for example, Welsh Government data collection)</li> <li>● to keep children safe (such as emergency contact details)</li> </ul>	Article 6(1)(e): processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller  Article 6(1)(c): processing is necessary for compliance with a legal

	<ul style="list-style-type: none"> <li>to provide appropriate pastoral care</li> </ul>	<p>obligation to which the controller is subject</p> <p>Article 6(1)(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person</p>
<p>Characteristics (such as ethnicity, race, language, nationality, country of birth and free school meal eligibility)</p>	<ul style="list-style-type: none"> <li>to comply with the law regarding data sharing and to meet the statutory duties placed upon us (for example, Welsh Government data collection)</li> </ul>	<p>Article 6(1)(e): processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> <p>Article 6(1)(c): processing is necessary for compliance with a legal obligation to which the controller is subject</p>
<p>Safeguarding information (such as court orders and professional involvement)</p>	<ul style="list-style-type: none"> <li>to provide appropriate pastoral care</li> <li>to keep children safe (such as emergency contact details)</li> </ul>	<p>Article 6(1)(c): processing is necessary for compliance with a legal obligation to which the controller is subject</p> <p>Article 6(1)(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person</p>
<p>Additional Learning Needs (including the needs and ranking)</p>	<ul style="list-style-type: none"> <li>to support pupil learning</li> <li>to monitor and report on pupil attainment progress</li> <li>to provide appropriate pastoral care</li> <li>to comply with the law regarding data sharing and to meet the statutory duties placed upon us (for example, Welsh Government data collection)</li> </ul>	<p>Article 6(1)(e): processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<p>Medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)</p>	<ul style="list-style-type: none"> <li>to keep children safe (such as food allergies and emergency contact details)</li> <li>to provide appropriate pastoral care</li> </ul>	<p>Article 6(1)(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person</p>
<p>Attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)</p>	<ul style="list-style-type: none"> <li>to support pupil learning</li> <li>to provide appropriate pastoral care</li> <li>to keep children safe</li> <li>to comply with the law regarding data sharing and to meet the statutory duties placed upon us (for example, Welsh Government data collection)</li> </ul>	<p>Article 6(1)(e): processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> <p>Article 6(1)(c): processing is necessary for compliance with a legal obligation to which the controller is subject</p> <p>Article 6(1)(d): processing is</p>

		necessary in order to protect the vital interests of the data subject or of another natural person
Assessment and attainment (such as the Welsh Tests and school reports)	<ul style="list-style-type: none"> <li>to support pupil learning</li> <li>to monitor and report on pupil attainment progress</li> <li>to assess the quality of our services</li> <li>to comply with the law regarding data sharing and to meet the statutory duties placed upon us (for example, Welsh Government data collection)</li> </ul>	<p>Article 6(1)(e): processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> <p>Article 6(1)(c): processing is necessary for compliance with a legal obligation to which the controller is subject</p>
Behavioural information (such as exclusions and any relevant alternative provision put in place)	<ul style="list-style-type: none"> <li>to support pupil learning</li> <li>to provide appropriate pastoral care</li> <li>to keep children safe (such as food allergies and emergency contact details)</li> <li>to comply with the law regarding data sharing and to meet the statutory duties placed upon us (for example, Welsh Government data collection)</li> </ul>	<p>Article 6(1)(e): processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> <p>Article 6(1)(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person</p>
Photographs	<ul style="list-style-type: none"> <li>to support pupil learning</li> <li>to publicise activities and celebrate achievements</li> </ul>	Article 6(1)(a): the data subject (or parent) has given consent to the processing of his or her personal data for one or more specific purposes
CCTV images	<ul style="list-style-type: none"> <li>to keep children safe</li> </ul>	Article 6(1)(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person

Some of the personal data we process can be more sensitive in nature and therefore requires a higher level of protection. The GDPR 2016 refers to the processing of these data as ‘special categories of personal data’:

Personal Data We Hold	Lawful Basis (Article 9 of GDPR 2016)
Characteristics (such as ethnicity, race and religious faith)	Article 9(2)(b): processing is necessary for the purposes of 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
Medical (such as health data and genetic data)	Article 9(2)(c): processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent

## **How we collect pupil information:**

We collect pupil information via enrolment and consent forms, secure file transfer from previous school, Monmouthshire County Council, other Local Authorities, the NHS and agencies working alongside the family.

Pupil data is essential for the school's operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the GDPR 2016, we will inform you on the Data Collection Form whether you are required to provide certain pupil information to us or if you have a choice in this and we will explain possible consequences of failing to provide that personal data.

## **Storing pupil data:**

To ensure our pupil information is kept safe we have the following controls/limitations in place:

- the information will not be used for any purpose other than those stated in this notice
- the information will be held within secure systems/locations, with appropriate levels of security, that comply with relevant data protection legislation
- the information will only be shared for lawful purposes and with an appropriate level of security that complies with relevant data protection legislation
- the information will only be held for the periods agreed in Monmouthshire County Council's Retention Schedule, after which it will be destroyed. The Retention Schedule is available on request
- the information will be held, used and shared in accordance with the DPA 2018 legislation and the GDPR 2016

## **Who we share pupil information with:**

- schools that the pupil's attend after leaving us
- Monmouthshire County Council, Youth Enterprise, the Welsh Government, Education Achievement Service (EAS), the Department for Education, the NHS and the Police.
- Fischer Family Trust (FFT) and A Level Performance Service (ALPs) (helps us track pupil progress)
- Examination Boards (pupil level data)
- ParentPay (online payment service for schools)
- ID Manager (conversion of biometric information into a digital form) is shared with the Impact system to enable cashless catering.
- Impact system is used to manage cashless catering.
- University and Colleges Admission Service (UCAS) and Careers Wales (the school provides student references including predictions of examination success for applications to Higher Education, Further Education, apprenticeships, work based learning or employment)
- SIMS (School Information Management System)
- Apps to enhance pupil learning (such as PiXL maths<sub>1</sub>, Unifrog<sub>1</sub>, Giglets<sub>1</sub>.)
- Websites to support learning (such as PiXL, Boxall Assessment)
- Virtual Learning Environments such as Edmodo

- Evolve (managing education visits)
- The Hwb (a website and collection of online tools provided to all schools in Wales by the Welsh Government)
- School Photos, taken by Colorfoto (data capture to link photos with pupils)
- Shared Resource Service (SRS) (schools IT provider)
- Extra-Curricular Providers (such as after school clubs and sporting activities)

### **Why we share pupil information**

We will share information where we have legal basis to do so, otherwise we will ask for consent. When you give your consent for your child's information to be held and/or shared for any purpose, you can withdraw that consent at any time, by contacting the Data Protection Officer named above. Any processing undertaken before consent was withdrawn will not be affected.

### **Rights in relation to your child's personal data**

Under data protection legislation, parents and pupils have the right to make a 'Subject Access Request' to gain access to information about them that we hold. To make a request for your child's personal information, or to be given access to your child's educational record, contact the Data Protection Officer named above.

You also have the right to request (in certain situations):

- to have any information we hold about your child corrected
- to have any information we hold about your child erased
- to restrict how information we hold about your child can be used or shared
- to object to information about your child being held
- to have any electronic information we hold about your child provided to you or transferred to a third party
- to challenge decisions relating to your child made using automated decision making and profiling means (generally, there are no decisions made in our school that solely rely upon automated decision making or profiling alone. For further information, contact the Data Protection Officer named above)

### **Transferring data outside of the EEA**

Information entered onto the apps marked with a "1" may be transferred out of the EEA. However, the companies have confirmed that they have appropriate measures and controls in place to protect the information in accordance with relevant data protection laws and regulations.



**The category of parental information that we collect, hold and share (process) include:**

- personal identifiers and contacts (such as name, contact details, address and family circumstances)
- characteristics (such as ethnicity and language)
- medical (such as details of physical and mental health)
- support received, including care packages, plans and support providers
- CCTV images

**Why we collect and use your information:**

- to report to you on your child’s attainment and progress
- provision of information, such as communication of emergency closures and events/activities
- promoting the school, such as school newsletters
- to provide appropriate pastoral care
- to protect pupil welfare, such as being able to contact you in an emergency
- to administer admissions waiting lists
- to assess the quality of our services
- to comply with the law regarding data sharing and to meet the statutory duties placed upon us (for example, Welsh Government data collection)

**Under GDPR 2016, the lawful bases we rely on for processing pupil information are:**

Personal Data We Hold	Processing Activity	Lawful Basis (Article 6 of GDPR 2016)
Personal identifiers and contacts (such as name, contact details, address and family circumstances)	<ul style="list-style-type: none"> <li>● to report to you on your child’s attainment and progress</li> <li>● provision of information, such as communication of emergency closures and events/activities</li> <li>● promoting the school, such as school newsletters</li> <li>● to provide appropriate pastoral care</li> <li>● to protect pupil welfare, such as being able to contact you in an emergency</li> <li>● to administer admissions waiting lists</li> <li>● to assess the quality of our services</li> <li>● to comply with the law regarding</li> </ul>	<p>Article 6(1)(e): processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> <p>Article 6(1)(c): processing is necessary for compliance with a legal obligation to which the controller is subject</p> <p>Article 6(1)(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person</p> <p>Article 6(1)(a): the data subject has given consent to the processing of his or her personal data for one or more specific purposes</p>

	data sharing and to meet the statutory duties placed upon us (for example, Welsh Government data collection)	
Characteristics (such as ethnicity and language)	<ul style="list-style-type: none"> <li>to comply with the law regarding data sharing and to meet the statutory duties placed upon us (for example, Welsh Government data collection)</li> </ul>	<p>Article 6(1)(e): processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> <p>Article 6(1)(c): processing is necessary for compliance with a legal obligation to which the controller is subject</p>
Medical (such as details of physical and mental health)	<ul style="list-style-type: none"> <li>to provide appropriate pastoral care</li> <li>to protect pupil welfare</li> </ul>	<p>Article 6(1)(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person</p> <p>Article 6(1)(a): the data subject has given consent to the processing of his or her personal data for one or more specific purposes</p>
Support received, including care packages, plans and support providers	<ul style="list-style-type: none"> <li>to provide appropriate pastoral care</li> <li>to protect pupil welfare</li> <li>to meet the statutory duties placed upon us</li> </ul>	<p>Article 6(1)(e): processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> <p>Article 6(1)(c): processing is necessary for compliance with a legal obligation to which the controller is subject</p> <p>Article 6(1)(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person</p>
CCTV images	<ul style="list-style-type: none"> <li>to keep our pupils, staff and visitors safe</li> <li>to prevent and detect crime</li> </ul>	<p>Article 6(1)(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person</p>

Some of the personal data we process can be more sensitive in nature and therefore requires a higher level of protection. The GDPR 2016 refers to the processing of these data as 'special categories of personal data':

Personal Data We Hold	Lawful Basis (Article 9 of GDPR 2016)
Characteristics (such as ethnicity and race)	Article 9(2)(b): processing is necessary for the purposes of 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

<p>Medical (such as health data)</p>	<p>Article 9(2)(c): processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent</p> <p>Article 9(2)(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject</p>
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### **How we collect your information**

We collect your information via enrolment and consent forms, secure file transfer from previous school, Monmouthshire County Council, other Local Authorities, the NHS and agencies working alongside the family.

Your data is essential for the school's operational use. Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the GDPR 2016, we will inform you on the Enrolment Form whether you are required to provide certain pupil information to us or if you have a choice in this and we will explain possible consequences of failing to provide that personal data.

### **Storing your data**

To ensure your information is kept safe we have the following controls/limitations in place:

- the information will not be used for any purpose other than those stated in this notice
- the information will be held within secure systems/locations, with appropriate levels of security, that comply with relevant data protection legislation
- the information will only be shared for lawful purposes and with an appropriate level of security that complies with relevant data protection legislation
- the information will only be held for the periods agreed in Monmouthshire County Council's Retention Schedule, after which it will be destroyed. The Retention Schedule is available on request
- the information will be held, used and shared in accordance with the DPA 2018 legislation and the GDPR 2016

### **Who we share your information with:**

- schools that your child attend after leaving us
- Monmouthshire County Council and Health and social welfare organisations, such as the NHS and the Police.
- ParentPay (online payment service for schools)
- University and Colleges Admission Service (UCAS) and Careers Wales (the school provides student references including predictions of examination success for applications to Higher Education, Further Education, apprenticeships, work based learning or employment)
- SIMS (School Information Management System)
- Evolve (managing education visits)
- Shared Resource Service (SRS) (schools IT provider)

## **Why we share your information**

We will share information where we have legal basis to do so, otherwise we will ask for consent. When you give your consent for your information to be held and/or shared for any purpose, you can withdraw that consent at any time, by contacting the Data Protection Officer named above.

Any processing undertaken before consent was withdrawn will not be affected.

## **Rights in relation to your personal data**

Under data protection legislation, you have the right to make a 'Subject Access Request' to gain access to the personal information that we hold about you. To make a request for your personal information, contact the Data Protection Officer named above.

You also have the right to request (in certain situations):

- to have any information we hold about you corrected
- to have any information we hold about you erased
- to restrict how information we hold about you can be used or shared
- to object to information about you being held
- to have any electronic information we hold about you provided to you or transferred to a third party
- to challenge decisions relating to you made using automated decision making and profiling means (generally, there are no decisions made in our school that solely rely upon automated decision making or profiling alone. For further information, contact the Data Protection Officer named above)

## **Transferring data outside of the EEA**

If we are aware of apps that transfer information out of the EEA, the companies will have confirmed that they have appropriate measures and controls in place to protect the information in accordance with relevant data protection laws and regulations.

### What is it all about?

We have to let you know how our school uses any personal information that we hold about you. This document explains how we collect, keep and use your information.

We have a Data Protection Officer, whose job it is to make sure that we are acting in the right way when collecting, keeping and using your personal information. Their name is Mr Stuart Mullaney



### Who looks after the information?

The school is the data controller of the personal information you give us – we look at how and why your information is collected and used. Sometimes the school has to give your information to other people, such as the government, but it will only give away your information when your parents say it's ok or when the law says that they have to. When your data is given to someone else, they must look after it and keep it safe.



### Why do we collect and use your information?

We will only collect your information when we need it to help us do our job or to follow the law. When we have collected it, here's how we use it:

- to help you learn
- to check how you are doing in school and work out whether you or your teachers need any extra help
- to give you any extra support you need when not in class
- to see how well the school as a whole is doing
- to look after you and keep you safe
- because we have to tell Welsh Government how you and we are doing



### What information do we collect?

There is some information about you, which your parents or guardians have to give us. There are some occasions when your parents or guardians can choose whether or not to give us the information. We will always tell your parents or guardians whether they must give certain information to us, or if they have a choice. We will explain what might happen if they don't give us that information. The information we hold about you includes:

- Personal information (such as your name and where you live and when you were born)
- Characteristics (such as your ethnicity, the country where you were born and if you should have free school meals)

- Safeguarding information (such as if you and your family need help or support from other people)
- Special educational needs (if you need extra help to learn)
- Medical information (information about any medicines you take or if you are not able to eat certain food)
- Attendance information (such as the days that you have been at school, any days that you have missed and why you missed them)
- Assessment and attainment (such as your Test Results or your school report)
- Behaviour information (such as if you are well-behaved or to record when you have not been well-behaved)
- Photographs of you learning at school
- CCTV images



### **How long do we keep your information?**

We don't keep your information for ever. We only keep it for as long as we need, to help us to do the things we needed it for. We have a policy that tells us how long to keep it and when to bin it.



### **How do we store your information?**

To make sure that your information is kept safe we do the following:

- The information will not be used for any reason other than the reasons we have talked about in this document.
- The information will be kept either on a computer (that has a password) or in a locked cupboard. Only some people are allowed to have the password for the computer or the key for the locked cupboard.



### **Who do we share your information with?**

Your information will only be shared with other people, if the law says that we can share it. We will make sure that your information is kept safe when we do share it too. We sometimes share your information with:

- schools that you go to after leaving us
- Monmouthshire County Council, Youth Enterprise, the Welsh Government, Education Achievement Service (EAS), the Department for Education, the NHS and the Police.
- Fischer Family Trust (FFT) and A Level Performance Service (ALPs) (helps us track pupil progress)
- Examination Boards (pupil level data)
- ParentPay (online payment service for schools)

- ID Manager (conversion of biometric information into a digital form) is shared with the Impact system to enable cashless catering.
- Impact system is used to manage cashless catering.
- University and Colleges Admission Service (UCAS) and Careers Wales (the school provides student references including predictions of examination success for applications to Higher Education, Further Education, apprenticeships, work based learning or employment)
- SIMS (School Information Management System)
- Apps to enhance pupil learning (such as PiXL maths<sub>1</sub>, Unifrog<sub>1</sub>, Giglets<sub>1</sub>.)
- Websites to support learning (such as PiXL, Boxall Assessment)
- Virtual Learning Environments such as Edmodo
- Evolve (managing education visits)
- The Hwb (a website and collection of online tools provided to all schools in Wales by the Welsh Government)
- School Photos, taken by Colorfoto (data capture to link photos with pupils)
- Shared Resource Service (SRS) (schools IT provider)
- Extra-Curricular Providers (such as after school clubs and sporting activities)



### **What are your rights?**

You and your parents have the right (in some situations) to:

- Be told how we use your information
- Ask to see the information we hold
- Ask us to change information you think is wrong
- Ask us to remove information when it's not needed anymore
- Ask us to only use your information in certain ways
- Tell us you don't want your information to be processed

If the information we are collecting is information that you can choose not to give, you can tell us to stop collecting it at any time.



### **Would you like to know more?**

If you're worried about how we get and use your information, you can speak to our Data Protection Officer Mr Stuart Mullaney who will be able to help you and answer any questions that you have.

If you want to speak to somebody not at the school, you can call the people who look after information, called the Information Commissioner's Office (ICO), on 0303 123 1113 or using their live web chat.

## **Four important things to understand**

Now you've read this, we hope you understand that:

- The law allows us to get and use your information to help us do our job
- We may share your information with others, but only when we really need to
- We will ask for your parent's permission to share your information whenever you have a choice.
- Your parents can tell us not to share your information, even when they have said yes before



**This privacy notice applies to the workforce, volunteers and members of the Governing Body. The category of workforce information that we collect, hold and share (process) include:**

- Personal identifiers and contacts (such as name, address, employee or teacher number and national insurance number)
- Characteristics (such as gender and ethnic group)
- Medical (such as details of physical and mental health)
- Contract and financial information (such as start date, hours worked, post, roles and salary information)
- Absence Information (such as number of absences and reasons)
- Relevant Qualifications
- Record of DBS check
- Photographs
- CCTV images
- Business Interest information

**Why we collect and use workforce information:**

- enable the development of a comprehensive picture of the workforce, volunteers and Governing Body and how it is deployed
- inform the development of recruitment and retention policies
- improve the management of workforce data across the sector
- allow better financial modelling and planning
- support the work of the School Teachers' Review Body
- comply with the law regarding data sharing and to meet the statutory duties placed upon us (for example, Welsh Government data collection)
- enable individuals to be paid
- safeguarding and to make safer recruitment decisions by identifying candidates who may be unsuitable to work with children
- keep the workforce, volunteers and Governing Body safe (such as emergency contact details)
- to support pupil learning
- to publicise activities and celebrate achievements

**Under GDPR 2016, the lawful bases we rely on for processing workforce information are:**

Personal Data We Hold	Processing Activity	Lawful Basis (Article 6 of GDPR 2016)
Personal identifiers and contacts (such as name, address, employee and/or teacher number and national insurance number)	<ul style="list-style-type: none"> <li>• comply with the law regarding data sharing and to meet the statutory duties placed upon us (for example, Welsh Government data collection)</li> <li>• improve the management of workforce, volunteers and Governing Body data across the sector</li> <li>• keep the workforce, volunteers and Governing Body safe (such as emergency contact details)</li> </ul>	<p>Article 6(1)(b): processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Article 6(1)(e): processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> <p>Article 6(1)(c): processing is necessary for compliance with a legal obligation to which the controller is subject</p> <p>Article 6(1)(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person</p>
Characteristics (such as gender and ethnic group)	<ul style="list-style-type: none"> <li>• comply with the law regarding data sharing and to meet the statutory duties placed upon us (for example, Welsh Government data collection)</li> </ul>	<p>Article 6(1)(c): processing is necessary for compliance with a legal obligation to which the controller is subject</p>
Medical (such as details of physical and mental health)	<ul style="list-style-type: none"> <li>• keep the workforce, volunteers and Governing Body safe</li> </ul>	<p>Article 6(1)(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person</p>
Contract and financial information (such as start date, hours worked, post, roles and salary information)	<ul style="list-style-type: none"> <li>• enable the development of a comprehensive picture of the workforce, volunteers and Governing Body and how it is deployed</li> <li>• inform the development of recruitment and retention policies</li> <li>• improve the management of workforce, volunteers and Governing Body data across the sector</li> <li>• allow better financial modelling and planning</li> <li>• support the work of the School Teachers' Review Body</li> <li>• enable individuals to be paid</li> </ul>	<p>Article 6(1)(b): processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Article 6(1)(e): processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> <p>Article 6(1)(c): processing is necessary for compliance with a legal obligation to which the controller is subject</p> <p>Article 6(1)(d): processing is necessary in order to protect the vital</p>

		interests of the data subject or of another natural person
Absence Information (such as number of absences and reasons)	<ul style="list-style-type: none"> <li>inform the development of recruitment and retention policies</li> <li>enable individuals to be paid</li> <li>improve the management of workforce, volunteers and Governing Body data across the sector</li> </ul>	<p>Article 6(1)(b): processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Article 6(1)(e): processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Relevant Qualifications	<ul style="list-style-type: none"> <li>enable the development of a comprehensive picture of the workforce, volunteers and Governing Body and how it is deployed</li> <li>inform the development of recruitment and retention policies</li> </ul>	<p>Article 6(1)(b): processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Article 6(1)(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person</p>
Record of DBS check	<ul style="list-style-type: none"> <li>to meet the statutory duties placed upon us</li> <li>safeguarding and to make safer recruitment decisions by identifying candidates who may be unsuitable to work with children</li> </ul>	<p>Article 6(1)(b): processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Article 6(1)(c): processing is necessary for compliance with a legal obligation to which the controller is subject</p> <p>Article 6(1)(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person</p>
Photographs	<ul style="list-style-type: none"> <li>safeguarding</li> <li>to support pupil learning</li> <li>to publicise activities and celebrate achievements</li> </ul>	<p>Article 6(1)(c): processing is necessary for compliance with a legal obligation to which the controller is subject</p> <p>Article 6(1)(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person</p> <p>Article 6(1)(a): the data subject has given consent to the processing of his or her personal data for one or more specific purposes</p>

CCTV images	<ul style="list-style-type: none"> <li>keep the workforce, volunteers and Governing Body safe</li> </ul>	Article 6(1)(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person
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Some of the personal data we process can be more sensitive in nature and therefore requires a higher level of protection. The GDPR 2016 refers to the processing of these data as ‘special categories of personal data’:

Personal Data We Hold	Lawful Basis (Article 9 of GDPR 2016)
Characteristics (such as ethnicity and race)	Article 9(2)(b): processing is necessary for the purposes of 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
Medical (such as health data and genetic data)	Article 9(2)(a): the data subject has given explicit consent to the processing of those personal data for one or more specified purposes

### Collecting workforce, volunteers and Governing Body information

We collect personal information via Staff Contract Forms, Workforce, Volunteers and Governing Body Data Collection Forms, Occupational Health forms and MCC e-forms.

Workforce, volunteers and Governing Body data is essential for the school’s operational use. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with the GDPR 2016, we will inform you on the Data Collection Forms whether you are required to provide certain information to us or if you have a choice in this and we will explain possible consequences of failing to provide that personal data.

### Storing workforce, volunteers and Governing Body data

To ensure your information is kept safe we have the following controls/limitations in place:

- the information will not be used for any purpose other than those stated in this notice
- the information will be held within secure systems/locations, with appropriate levels of security, that comply with relevant data protection legislation
- the information will only be shared for lawful purposes and with an appropriate level of security that complies with relevant data protection legislation
- the information will only be held for the periods agreed in Monmouthshire County Council’s Retention Schedule, after which it will be destroyed. The Retention Schedule is available on request
- the information will be held, used and shared in accordance with the DPA 2018 legislation and the GDPR 2016

### Who we share workforce volunteers and Governing Body information with:

- schools or employers you go to after you leave

- Monmouthshire County Council, EAS, the Welsh Government and HMRC
- Our Occupational Health Provider Insynchhealth
- Professional Bodies, such as School Teachers' Review Body and Education Workforce Council
- Disclosure and Barring Service (DBS)
- Teacher's Pensions and the Local Authority Pension Scheme (administered by Torfaen County Borough Council)
- SIMS (school information management system)
- Evolve (Manage educational visits)
- ID Manager (conversion of biometric information into a digital form) is shared with the Impact system to enable cashless catering.
- Impact system is used to manage cashless catering.
- Financial institutions (for the purpose of providing information relating to mortgages/rental agreements etc.)

### **Why we share workforce information**

We will share information where we have legal basis to do so, otherwise we will ask for consent. When you give your consent for your information to be held and/or shared for any purpose, you can withdraw that consent at any time, by contacting the Data Protection Officer named above.

Any processing undertaken before consent was withdrawn will not be affected.

### **Rights in relation to your personal data**

Under data protection legislation, you have the right to make a 'Subject Access Request' to gain access to information about you that we hold. To make a request for your personal information, contact the Data Protection Officer named above. You also have the right to request (in certain situations):

- to have any information we hold about you corrected
- to have any information we hold about you erased
- to restrict how information we hold about you can be used or shared
- to object to information about you being held
- to have any electronic information we hold about you provided to you or transferred to a third party
- to challenge decisions relating to you made using automated decision making and profiling means (generally, there are no decisions made in our school that solely rely upon automated decision making or profiling alone. For further information, contact the Data Protection Officer named above)

### **Transferring data outside of the EEA**

If we are aware of apps that transfer information out of the EEA, the companies will have confirmed that they have appropriate measures and controls in place to protect the information in accordance with relevant data protection laws and regulations.

## PRIVACY NOTICE FOR PEOPLE CAPTURED ON CCTV

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### The categories of information that we process include:

This privacy notice tells you what to expect when we collect personal information. It applies to information we collect about:

- people who are recorded on CCTV operated by the school

### Why we collect and use this information:

We use CCTV in various locations around the school site to ensure it remains safe and to prevent and detect crime. We will adhere to the ICO's code of practice for the use of CCTV.

We do not need to ask individuals' permission to use CCTV, but we make it clear where individuals are being recorded. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use.

### Under GDPR 2016, the lawful basis we rely on for processing CCTV footage is:

Personal Data We Hold	Processing Activity	Lawful Basis (Article 6 of GDPR 2016)
CCTV footage	<ul style="list-style-type: none"><li>● to ensure the safety of our pupils, staff and visitors</li><li>● to help with crime prevention and detection</li></ul>	Article 6(1)(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person

### Storing CCTV footage:

To ensure your information is kept safe we have the following controls/limitations in place:

- the information will not be used for any purpose other than those stated in this notice
- the information will be held within secure systems/locations, with appropriate levels of security, that comply with relevant data protection legislation
- the information will only be shared for lawful purposes and with an appropriate level of security that complies with relevant data protection legislation
- the information will not be kept for longer than necessary for the purposes stated in this notice, as per the ICO Code of Practice for CCTV
- the information will be held, used and shared in accordance with the DPA 2018 legislation and the GDPR 2016

### Who we share CCTV footage with:

We will share information where we have legal basis to do so, with organisations such as:

- statutory prosecuting bodies (Police)
- Monmouthshire County Council

**Rights in relation to your personal data:**

Under data protection legislation, you have the right to make a 'Subject Access Request' to gain access to the CCTV images of yourself and be provided with a copy subject to certain criteria. To make a request for CCTV images of yourself or your children, contact the Data Protection Officer named above. You also have the right to request (in certain situations):

- to have any information we hold about you erased
- to restrict how information we hold about you can be used or shared
- to object to information about you being held
- to have any electronic information we hold about you provided to you or transferred to a third party