



## Privacy Notice – Narberth Community Primary School

This privacy notice covers how Narberth Community Primary School (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, criminal convictions via safeguarding reports

#### CCTV:

- Images/video

#### Photos/Videos:

- Images/audio

#### Staff records:

- Name, contact details, next of kin, NI numbers, DOB, sickness and absence records, capability procedures, dismissals

#### Visitor Sign in:

- Name and reason for visit, date and time enter and leave, car reg optional

#### Accident & Incident Reporting:

- Name, date, time and place of the incident, details of the injury or illness, details of any first aid provided, name and signature of the first aider or person dealing with the incident, DOB, contact details

#### **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: Statutory and government purposes

#### **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., Literacy Assessment Online, 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, Designed to Smile, Kerbcraft, Hwb, Flying Start, 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); **Speakr**; **Traciwr** (tracking and monitoring curriculum); **Haven System** (school meals); **School Nurse**; **Seesaw**; **Taith360**; **Wonde**; **IDL Literacy**; **Power BI**; **Darllen Co**; **Urdd**; **LexiaUK**; **Big Maths**; **Oxford Reading Tree**; **Carousel**; **Nessy**; **Giglets**; **All Wales Reading Test (AWRT)**; **GL Assessment**; **Youth Support Services**; **Colleges of Further Education and Work Based Trainers**; **Examination Bodies**; **Careers Wales**; **The Learning Record Service (LRS)**; **Learning Curve**; **Police**; **Morfa Bay Adventure**; **Time Tables Rock Stars**; **Research on the Instruction of Literacy with Language (RILL)**; **Estyn**; **Mathletics**; **Scopay**;
- **CCTV**: **Police**; **Tremorfa**; **Dyfed Alarms**; **Local Authority**
- Photos and Videos: **Hwb**; **Social Media**, **Twitter**, **Facebook**, **Instagram**; **Local Media** and potentially **National Media**; **School Website**; **Seesaw**.

- Staff Records: **Local Authority; Hwb; School Management Information System (SIMS); External Insurance Absence Scheme** (School Advisory Service); **Mutual Absence Scheme; WJEC; Education Workforce Council (EWC); Police; Governors; Other bodies for reference purposes; Estyn; School Newsletter**
- Visitor Sign In: **Governors; Halo Support Ltd;**
- 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.

Narberth Community Primary School 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?**

Narberth Community Primary School will only keep your information for as long as is necessary, 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 **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](mailto:accesstorecords@pembrokeshire.gov.uk)

Telephone: 01437 764551

### **Complaints or Queries**

Narberth Community Primary School 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

Mrs Kate Moore

Narberth CP School

Jesse Road

Narberth

Pembrokeshire, SA67 7FE.

Email: [moorek47@hwbcymru.net](mailto:moorek47@hwbcymru.net)

Telephone: 01834 860776

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

2<sup>nd</sup> Floor, Churchill House

Churchill Way

Cardiff

CF10 2HH

Email: [wales@ico.org.uk](mailto:wales@ico.org.uk)

Telephone: 0330 414 6421

**Our Contact Details as Data Controller are:**

Mrs Kate Moore

Narberth CP School

Jesse Road

Narberth

Pembrokeshire, SA67 7FE.

Email: [moorek47@hwbcymru.net](mailto:moorek47@hwbcymru.net)

Telephone: 01834 860776

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.