



## BOWNNOG SCHOOL

We take your privacy very seriously, so we urge you to read this policy carefully as it contains important information regarding:

- Who we are
- What information do we collect
- How and why we collect, store and share personal information
- Your rights in relation to your personal information
- How to contact us and supervising authorities if you have a complaint

### Who we are

**Ysgol Botwnnog** ('we') collects, uses and is responsible for certain personal information about you as a 'data controller'. In doing so, we are regulated by the General Data Protection Regulations which are in effect throughout the European Union (including the United Kingdom) and are responsible as a 'data controller' for that personal information for the purposes of those laws.

### Personal information about pupils that we collect and use:

- Personal information and contacts to identify pupils (name, date of birth, gender, address, pupils' unique number (UPN), learners' unique number (ULN), applicants' unique number (UCI), email address, emergency contact details)
- Characteristics (ethnicity, nationality, home language, FSM eligibility)
- Safeguarding information (court orders, personal involvement and social services and child protection reports, relevant background information about the family)
- Special educational needs (needs and position includes 'More able and talented' information)
- Attendance (number of sessions attended, number of absences and reasons for absence)
- Medical and administration (doctor information, allergies, medication and dietary requirements)
- Assessment and attainment (statutory and non-statutory test results, educational history, expected achievement levels, seasonal and annual reports)
- Conduct information (prohibitions and any provisions that have been put in place)
- Schedule and classes attended (includes musical instrument lessons)
- Photos (including CCTV images)
- Permission for school tours and photos published (including name of person who gave the permission and date)



**We collect and use information about pupils for the following purposes:**

- To support the pupil's education
- To monitor and report on pupil attainment progress
- To provide appropriate pastoral care
- To assess the quality of our services
- To keep children safe (food allergies, emergency contact details, CCTV images)
- To meet statutory requirements for use with data collections

We can use your information for automated decision making, including profiling. This is where we automatically make a decision about you without human intervention.

**Under the General Data Protection Regulation (GDPR), the legal grounds on which we rely to process pupil information are:**

- Processing is necessary to comply with legal obligations to which the data controller is subject
- Processing is necessary to protect the essential benefits of the data subject or any other natural person.
- Processing is necessary for the purpose of a task undertaken in the public interest or by the exercise of the official authority of the data controller

**In addition, linked to any special category data**

- Processing is necessary for the purposes of completing the implications and using certain rights held by the controller or the subject of the data that provide for appropriate safeguards for the fundamental rights and interests of the data text
- Processing is necessary to protect the vital interests of the data subject or other natural person when the subject of the data does not have the physical or legal ability to give consent
- Processing is necessary for public interest archiving purposes, scientific research, historical research or statistical purposes. This will be proportionate to the aim aimed at, respect the essence of the right to data protection and protect the fundamental rights and interests of the data text.

**The legal obligations for processing pupil information are:**

- Education (School Information) (Wales) Regulations 2011
- Education (Pupil Information) (Wales) Regulations 2011
- Education (School Performance and Absence Targets) (Wales) Regulations 2011
- Education Report (Head of Parents and Adults Report) (Wales) 2011
- Data Protection Act 1998
- The General Data Protection Regulation (GDPR) and Data Protection Act 2018
- Freedom of Information Act 2012
- Additional Learning Needs and Educational Tribunal (Wales) Act 2018
- Governance of Maintained Schools (Wales) Regulations 2005
- Social Services and Well-being Act 2014
- Equality Act 2010



- Regulations (Fire Safety) Order 2005/ Regulatory Reform (Fire Safety) Order 2005 (PEEPS forms are completed and these include details of any disabilities a child / member of staff has)

### **Collecting Pupil Information**

We collect pupil information through registration forms as pupils start school and we receive some data through *Common Transfer File* (CTF) if a child transfers to us from another school

While most pupil information you provide to us is essential, some information will be provided on a voluntary basis

In order to comply with the data protection legislation, we will let you know whether you will be required to provide us with specific information about a pupil or if you have a choice in this.

If information is provided to us on a voluntary basis, we will ask you to give explicit consent and give you the option to withdraw the consent at any time.

### **Storing Pupil Data**

We keep pupil data safe for certain periods of time as shown in our retention period list. For more information about our retention periods, please visit the data protection policy on our website [www.ysgolbotwnnog.org](http://www.ysgolbotwnnog.org)

### **Who we share information about pupils with**

We regularly share information about pupils with:

- Schools that the pupil goes to when they leave us
- Gwynedd Council, Local Authority - School Counsellor, Welfare Officer, Social Services, Leisure, Transport, Finance, Derwen, GwE
- Betsi Cadwaladr University Health Board - school nurse, dentist, CAMHS
- Police and youth offending team
- Language Centres (when necessary)
- Welsh Government
- School Governing Body (space required)

### **Agencies we commission to provide services on our behalf**

- Welsh Government
- Exam Boards - WJEC, Edexcel, OCR, Pearson, Agored Cymru, AQA, JCQ (Joint Council for Qualifications Pearson), A2C, LRS (Learning Records Service)
- Further Education Colleges where pupils follow and/or transfer to KS4 - Coleg Menai, Coleg Meirion Dwyfor, Coleg Llandrillo
- Bangor University and other Higher Education institutions in Wales and Britain and universities involved in the Welsh Government's SEREN programme
- NFER (National Foundation For Educational Research)
- FFT (Fischer Family Trust)
- GwE
- *Capita* – SIMS



- SchoolComms
- School Gateway
- Williams and Williams (disposal of confidential materials)
- Delwedd
- Evolve
- PASS
- Tempest (school photos)
- Dropbox
- Twitter
- Facebook
- Gwynedd a Mon Schools Music Service
- MyConcern
- Gwynedd Ni – 'Team around the family', Care Threshold Team

### Relevant companies that promote and administer our pupils' learning experiences

- Welsh Government - via HwB
- GwE
- Careers Wales
- CAFcass - Children and Families Counselling and Support Service.
- *Advocacy Support Cymru* - Young Carers
- Urdd Gobaith Cymru
- Google Classroom
- Athletics
- Gorwel
- Young Offenders

### Youth support services

#### Pupils aged 13+

When our pupils turn 13, we will also pass on information about pupils to our local authority and/or youth support services provider because they have responsibilities in relation to the education or training of those aged 13-19 under section [507B of the Education Act 1996](#).

This enables them to provide services as follows:

- Youth Support Services
- Careers Advisors

A parent or guardian can apply that **only their child's** name, address and date of birth be passed on to their local authority or youth support services provider by notifying us. This right is transferred to the child / pupil once he/she is 16 years of age.



## Pupils aged 16+



We will also share specific information about pupils aged 16+ with our local authority and/or youth support services provider because they have responsibilities in relation to the education or training of those aged 13-19 years under [section 507B of the Education Act 1996](#).

This enables them to provide services as follows:

- post-16 education and training providers
- Youth Support Services
- Careers Advisors

For more information on services for young people, visit our local authority's website.

### Why we regularly share information about pupils

We do not share information about our pupils with anyone without permission, unless the law and policies allow us to do so.

We share pupil data with the Welsh Government on a statutory basis. Sharing data in this way underpins school funding and monitors educational attainment.

We are required to collect data under the Education (Pupil Information) (Wales) Regulations 2011 and the Education (School Performance and Absence Targets) (Wales) Regulations 2011.

We are required to share information about our pupils with our Local Authority, Gwynedd Council, and Welsh Government under the Education (Pupil Information) (Wales) Regulations 2011

### Request to access your personal data

Under data protection legislation, parents and pupils have the right to request access to the information we hold about them. To request your personal information, or request access to your child's educational record, please contact one of the below:

**Head of**

**Gwynedd  
LL53 8PY LL55 1SH**

**School Data Protection Officer  
Gwynedd Council Botwnnog School  
Castle Street Lake  
Caernarfon Botwnnog  
Gwynedd**

### You also have the right to:

- Object to the processing of personal data that is likely to cause, or cause, harm or distress
- Prevent anything from being processed for direct marketing purposes
- Oppose decisions made by automated means
- Correct, Prevent, delete or destroy incorrect personal data in certain circumstances
- Claiming damages for the harm caused as a result of breaches of Data Protection regulations



If you have a concern about how we collect or use your personal data, we ask that you raise your concern with us initially. Alternatively, you can contact the Information Commissioner's Office (ICO) via <https://ico.org.uk/concerns>

### **Update this privacy notice**

We may need to update this privacy notice periodically, therefore, we recommend that you revisit this information from time to time. This version last updated **November 2023**

### **Link**

If you would like to discuss anything in this privacy notice, please contact one of the below:

#### **Headmaster**

Ysgol Botwnnog

Botwnnog

Pwllheli

Gwynedd

LL53 8PY

#### **School Data Protection Officer**

**Gwynedd Council**

**Castle Street**

**Caernarfon**

**Gwynedd**

**LL55 1SH**