

HAVERFORDWEST HIGH VC SCHOOL



PRIVACY NOTICE PUPILS & PARENTS

Responsible	Written/Revised	Approved by Date
Mrs J Foss	June 2026	Full Governing Body Meeting June 2026

Document Owner and Approval

Mrs Julie Foss is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with School's policy review schedule.

A current version of this document is available to all members of staff via the staff web or the school website.

Signature:

Date:

Change History Record

Version	Description of Change	Date of Policy Release by Judicium
1	Initial Issue	06.05.18
2	Updated for UK GDPR and international transfers outside of the UK	06.05.21
3	Added reference to sharing data section about Department for Education request for regular attendance data collection	18.02.22
4	Amendments to introduction, and 'How to Raise a Concern' in line with amendments to UK GDPR by Data (Use and Access) Act 2025. Changed Judicium's Address. Clarification of conditions for processing special category data. Clarification re data sharing when there are compelling reasons to continue despite data subject 'opt out' added to 'Sharing Data'.	06.03.26

What the School, Local Authority and Welsh Assembly Government does with information it holds on Pupils

This Privacy Notice provides information about the collection and processing of pupils' personal and performance information by the Welsh Assembly Government, Pembrokeshire Local Authority (LA) and Haverfordwest High V. C. School in accordance with the UK General Data Protection Regulation (UK GDPR), section 537A of the Education Act 1996 and section 83 of the Children Act 19.

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) was incorporated into UK law as retained EU law and is now known as the UK GDPR. The UK GDPR operates alongside the Data Protection Act 2018, which supplements it by setting out additional provisions on matters such as the processing of personal data in specific sectors, exemptions, the powers of the Information Commissioner, and enforcement. The Data (Use and Access) Act 2025 further amends both the UK GDPR and Data Protection Act 2018 to modernise UK data protection rules and clarify certain rights and obligations. The GDPR continues to apply within the EU and to organisations that process personal data of individuals located in the EU.

This notice applies to all pupils and parents.

Who Collects This Information

Haverfordwest High VC School is a "data controller." This means that we are responsible for deciding how we hold and use personal information about pupils and parents. This means that we are responsible for deciding how we hold and use personal information about pupils and parents. Under data protection legislation, we are required to notify you of the information contained in this privacy notice.

This notice does not form part of any contract to provide services and we may update this notice at any time.

The collection & processing of personal information

The school collects information about pupils and their parents or legal guardians when they enrol at the school. The schools also collect information at other key times during the school year. Information is also received from other schools when pupils transfer. Any personal or sensitive information you share with us will be used to provide you with services and any statutory duties The Local Authority is required to fulfil. The processing of your data is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the school and Local Authority as the data controller.

We may collect, store and use the following categories of personal information about you:

Categories of Pupil Information We Collect, Process, Hold and Share

- Personal information such as name, pupil number, date of birth, gender and contact information;
- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses;
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility);
- Attendance details (such as sessions attended, number of absences and reasons for absence);
- Performance and assessment information;
- Behavioural information (including exclusions);
- Special educational needs information;
- Relevant medical information;
- Special categories of personal data (including ethnicity, relevant medical information, special educational needs information);
- Images of pupils engaging in school activities, and images captured by the School's CCTV system;
- Information about the use of our IT, communications and other systems, and other monitoring information;
- Post 16 learning information

We may also collect, store and use the following more sensitive types of personal information:

- Information about your race or ethnicity, religious or philosophical beliefs
- Information about your health, including any medical conditions and sickness records.
- Special educational needs information;

Collecting this Information

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 UK General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with u

How We Use Your Personal Information

We hold pupil data and use it for:

- Providing education services and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Informing decisions such as the funding of schools;
- Assessing performance and to set targets for schools;
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care;
- Support teaching and learning;
- Giving and receive information and references about past, current and prospective pupils, and to provide references to potential employers of past pupils;
- Managing internal policy and procedure;
- Enabling pupils to take part in assessments, to publish the results of examinations and to record pupil achievements;
- To carry out statistical analysis for diversity purposes;
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care;
- Enabling relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
- Monitoring use of the school's IT and communications systems in accordance with the school's IT security policy;
- Making use of photographic images of pupils in school publications, on the school website and on social media channels;
- Security purposes, including CCTV; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.
- To provide support to pupils after they leave the school

How we use particularly sensitive personal information

Special categories of particularly sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation, or biometrics (as defined under UK GDPR as "special category data") require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations in line with our data protection policy.
- For reasons of substantial public interest, such as for equal opportunities monitoring.
- Where necessary to establish, exercise or defend legal claims;
- Where necessary to protect your vital interests (or those of another person) and you are unable to consent.

The Lawful Bases on which we use this Information

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Consent: the individual has given clear consent to process their personal data for a specific purpose;
- Contract: the processing is necessary for a contract with the individual;
- Legal obligation: the processing is necessary to comply with the law (not including contractual obligations);
- Vital interests: the processing is necessary to protect someone's life.
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law; and We need all the categories of information in the list above primarily to allow us to comply with legal obligations. Please note that we may process information without knowledge or consent, where this is required or permitted by law.

Sharing Data

We may need to share your data with third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared unless we have compelling reasons to continue sharing it which override your rights and interests, it's the only way we can make sure you stay safe and healthy, or we are legally required to do so.

Welsh Government (WG) & Local Authority (LA)

The School has a legal duty to share certain information about pupils with the Welsh Assembly Government 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

The LA 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 WG and the LA receive information regarding National Curriculum assessment and Public Examination results and attendance data at pupil level.

Organisations who may share personal information

Information held by the School, LA and the Welsh Government on pupils, their parents or legal guardians may also be shared with other organisations when necessary including the Auditor General for Wales and the Local Health Board (School Nurse). For example if the sharing of information would protect a child's safety or, if the sharing is strongly in a child's best interest. We will not give information about our pupils to anyone without your consent unless the law allow us to do so.

An example of where the law would allow us to share information without your consent is Google Workspace. Google Workspace for Education is a collection of productivity, collaborative and education tools. These tools are used by school in order to enhance the teaching and learning experience. A few more examples would be

- Eedi which is used by the Mathematics Department as a mathematics diagnostic platform.
- Sparx which is a Mathematics homework platform.
- Exams Assist which is an Exams Management System used to assist the school with the process of conducting examinations.
- Unifrog which is an online platform aimed at helping students to research pathways, make applications and record activities.

We may need to share your child's personal information within the Local Authority and other services (e.g. a training provider) as part of Welsh Government's Youth Engagement and Progression Framework, a process designed to support your child's learning, and help them progress into further education, employment or training. We will only share the minimum amount of information necessary with whom we are legally obliged.

Examples of information we may need to share include:

Name,

Date of birth,

Examination results,

Barriers to learning

Pupils Aged 14 or Over

The information you supply will be used by the Chief Executive of Skills Funding, to issue your child with a Unique Learner Number (ULN), and to create your Personal Learning Record. Further details of how your information is processed and shared can be found at <http://www.learningrecordsservice.org.uk/learnparent/>.

Your Rights & Accessing Personal information held about your child

Pupils have certain rights under the General Data Protection Regulation 2016, including;

- **The right of access-** to be given access to personal data held about them. The presumption is that by the age of 12 a child has sufficient maturity to understand their rights and to make an access request themselves if they wish or, to give consent for a parent or guardian to act on their behalf. A parent or guardian would normally be expected to make a request on a child's behalf if the child is younger than 12 years of age.
- **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 in relation to any council service. 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 legal basis for processing your personal data. If you wish to access your personal data, or that of your child, then please contact the school in writing.

Storing Pupil Data

The school keeps information about pupils on computer systems and sometimes on paper.

Except as required by law, the school only retains information about pupils for as long as necessary in accordance with timeframes imposed by law and our internal policy.

How long do we keep hold of your information?

Except as otherwise permitted or required by applicable law or regulation, the school only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes. Data will be held in accordance with our retention schedules and will be securely disposed of once it is no longer required. For further information on retention schedules, please contact the school.

Other information

The Welsh Government, LA and school place a high value on the importance of information security and have a number of procedures in place to minimise the possibility of a compromise in data security.

The Welsh Government, LA and School will endeavour to ensure that information is kept accurate at all times. Personal information will not be sent outside the United Kingdom.

Seeking further information

For further information about the personal information collected and how it is used or, if you have concerns about the accuracy of personal information, or wish to exercise your rights

under the Data Protection Act 1998, you should contact; Haverfordwest High VC school on 01437 774749

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by Haverfordwest High VC School, then you can contact the DPO on the details below:

Data Protection Officer: Judicium Consulting Limited
Address: 5th Floor, 98 Theobalds Road, London, WC1X 8WB
Email: dataservices@judicium.com
Web: www.judiciumeducation.co.uk

Should you remain dissatisfied with our response, you also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information

Policy Review

The policy will be ratified by the Governing body.

Signed.....*C Williams*..... (Chair of Governors)

Date.....*30.06.2026*.....