

# Privacy Policy – Governing Body Processes (includes school staff, governors, parents and pupils in schools in the South East Wales region)

## What it covers

The Education Achievement Service (EAS) and its member Local Authorities (LAs) collect and process personal data and this policy establishes how we collect and process personal information relating to school staff, governors, parents and pupils in schools in the South East Wales region.

This policy applies to EAS and member LAs school staff, governors, parents and pupils in schools in the South East Wales region. It is important that you read this policy so that you are fully aware of how and why we are using your data.

Personal data, or personal information, means any information about an individual from which that person can be identified.

We are the processor for your personal data.

This version was last updated on 24 May 2018

## What information do we hold, process and share?

The different kinds of personal data which we collect and process are:

- Personal information of school governors (name, contact details, date of birth, gender, governing body attached to, training records and DBS number);
- Personal information of staff involved in statutory processes (name, contact details and school attached to);
- Personal information of parents and pupils involved in statutory processes (name, contact details and school attached to);
- Characteristics of parents and pupils (such language, English as an Additional Language (EAL), free school meal eligibility, Looked After Children status (LAC), additional learning needs information, assessment information, attendance and exclusion data);
- Characteristics of staff involved in statutory processes (employment records, date of birth, physical or mental health, political opinion, criminal offences or convictions, legal proceedings and disability);
- Trade union membership;
- Equal opportunities monitoring information, racial or ethnic origin, health, sexual orientation and religion or belief.

## Where do we hold this information?

Data will be stored in a range of different places, including: internal databases and in other IT systems (including email systems). Additionally, some personal information is held in paper format e.g. files and personnel records. All paper-based information and electronic databases are held securely and in accordance with data protections laws.

Specific, information related to statutory committees are held on a secure server, accessed only by limited EAS staff via individual usernames and passwords. Access to governor details is seen by those who have to see it and will keep it secure.

## Why we use this information

The role of the EAS is to support and challenge school improvement across the five South East Wales local authorities. The role of the Governor Support Team is to provide a clerking service for governing bodies. The clerk is the data processor

The information will be used to:

- Provide the clerking service and facilitating meetings of the Governor Support Team;
- Ensure compliance with legal obligations;

Some of the information we process constitutes "special categories" of personal information, which is information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information for uniquely identifying a person, information concerning health, and information concerning a person's sex life or sexual orientation. Information concerning criminal convictions is placed in a similar category. These special categories are considered particularly sensitive and the EAS will therefore only process this information where absolutely necessary. The EAS will ensure it is only seen by those who have to see it and will keep it secure.

## The lawful basis on which we use this information

The EAS rely on a number of lawful reasons for processing your information. These are:

- It is necessary for us to comply with our legal obligations; and/or
- It is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us; and/or
- It is necessary to protect the vital interests of the data subject or another person; and/or
- It is necessary for our legitimate interests; and/or
- where none of the other lawful reasons apply but it is necessary to protect the life of a persons to whom this policy is applicable or the life of someone else.

Where the personal information is one of the "special categories" (as described above), or relates to criminal convictions, the commission/alleged commission of criminal offences, or criminal proceedings, we will only process this information where:

- It is necessary to protect the vital interests of the data subject or another person; and/or
- the personal information has been manifestly made public by the data subject; and/or
- it is necessary in relation to legal claims; and/or

- it is necessary for reasons of substantial public interest; and/or
- it is necessary to protect the life of a persons to whom this policy is applicable or the life of someone else and they are physically or legally incapable of giving consent.

There will also be circumstances where the EAS ask for freely-given, specific, informed and clear consent to process certain types of information if it is not already covered by one of the lawful bases set out above.

## Storing personal information and data security

We will protect the quality and integrity of your personal information, in accordance with current law. We have implemented technologies and security policies to protect the stored personal data of our users from unauthorised access, improper use, alteration, unlawful or accidental destruction and accidental loss. In addition, we limit access to personal information to those employees, agents, contractors and other third parties who have a specific need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We will continue to enhance our security procedures, as new technology becomes available.

We hold the data for school governors for up to 5 years after their term of office ends after which the information will be destroyed securely, in accordance with current law.

We hold staff, pupil and parent data in relation to statutory process until the case is closed. The school has the responsibility for retaining the full history of pupils and the responsibility holding staff records.

## Personal information sharing and disclosure

The Education Achievement will not disclose, sell or rent your personal information to anyone, or use the data for any other purpose incompatible with the purpose for which it was originally collected. A request to view any personal information the Consortium holds should be made in the first instance to the user's LA. The EAS administrator can also be contacted via [business.support@sewaleseas.org.uk](mailto:business.support@sewaleseas.org.uk).

We do not transfer your personal data outside the European Economic Area

## Your rights

Under data protection legislation, you have the right to:

- Request access to and obtain a copy of your personal information;
- Object to the processing of your personal data where we are relying on your consent or EAS legitimate interests as the legal ground for processing;
- Ask EAS to stop the processing of your personal data, for example where the data is no longer necessary for the purposes of processing;
- Object to decisions being taken by automated means

- Have personal data rectified, erased, destroyed or to port your personal information.

Please note that not all of these rights apply to all information, and so we may not be able to comply with your request. We will always tell you if this is the case.

If you wish to exercise any of your rights, or have any requests or objections, these should be made in writing to the EAS' Data Protection Officer Sarah Jones, contact details are found below.

## Questions or suggestions

If you have any questions, comments, requests or suggestions regarding this policy or have any concerns about the processing of your personal data by the Education Achievement Service and/or its member LAs, please contact us, details are listed in the section below or contact:- the Information Commissioner's Office (ICO) ([www.ico.org.uk](http://www.ico.org.uk)).

## Contact Details

### By Post

Education Achievement Service  
Tredomen Gateway  
Tredomen Park  
Ystrad Mynach  
Hengoed  
CF82 7EH

**By Email** [business.support@sewaleseas.org.uk](mailto:business.support@sewaleseas.org.uk)

### By Telephone

01443 864963

### Opening Hours

Monday to Friday 8.30am to 5pm