

Privacy Policy – Pupil Level Data

(includes pupils and pupils parents/guardians)

What it covers

The Education Achievement Service (EAS) and its member Local Authorities (LAs) hold and process pupil personal information relating to pupils who attend maintained schools in the South East Wales region. This policy applies to EAS and member LAs school staff pupils in schools in the South East Wales region and their parents/guardians. 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 a processor for this 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 pupils and their parents/guardians (name, date of birth, address gender, Unique Pupil Number, school attended, contact details such as telephone numbers and email addresses);
- Characteristics of pupils and their parents/guardians (such as 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);
- Equal opportunities monitoring information, such as racial or ethnic origin.

The information we hold will have been collected, either by ourselves or third party organisations, in a variety of ways, such as provided by pupils or their parents/guardians, collected through application forms, obtained from passport or other identity documents, from forms completed at the start of school enrolment; from correspondence; or through interviews, meetings or other assessments. 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.

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 pupil records. All paper-based information and electronic databases are held securely and in accordance with data protection laws.

Access to this personal information is limited to relevant EAS staff where access to the data is necessary for performance of their roles.

Specifically, information related to pupil target setting is held on a secure, encrypted website, accessed only by school staff and EAS staff via individual usernames and passwords.

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 information will be used to:

- Access performance and support setting of pupil and school performance targets ;
- Ensure compliance with legal obligations;
- Produce anonymised data summary analyses which inform decisions such as funding and levels of support for schools.

"Special category" information 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. The EAS does not collect all types of special category information. Only some of the information we process constitutes certain types of special categories of personal information. Special category information is 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 EAS anonymise personal data (so that it can no longer be associated with you) and share this with third parties for research, analysis, statistical purposes or for the provision of advice or guidance, or funding decision making. We may use this information indefinitely without further notice to you.

The lawful basis on which we use this information

The EAS rely on a number of lawful reasons for processing pupil and parent/guardian information. These are:

- It is necessary for us to comply with our legal obligations; and/or



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- 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 pupils and parent/guardians for 3 academic years, after which the information will be destroyed securely, in accordance with current law.

Personal information sharing and disclosure

The Education Achievement Service will only share anonymised, aggregated data to member LAs, and we 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.

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:- Information Commissioner's Office – (ICO) (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

By Telephone

01443 864963

Opening Hours

Monday to Friday 8.30am to 5pm



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