Ysgol Penygaer Primary School

PRIVACY NOTICE FOR PUPILS AND PARENTS

SEPTEMBER 2026

Penygaer Primary School is the Data Controller for the personal data we hold about you and your child.

How we use your information

The proper handling of personal information by the school is very important in delivering education to your child.

Personal data is any information that relates to a person who can be directly or indirectly identified from the information. The terms 'information' and 'personal data' are used throughout this privacy notice and have the same meaning.

To ensure that the school treats personal information correctly, we seek to adhere in full to the requirements of Data Protection legislation.

This privacy notice has therefore been produced to explain as clearly as possible what we do with personal data.

1. The purposes for which we use personal data

The information we collect about you, and your child will be used for the purposes of:

- Supporting your child's learning
- Monitoring and reporting on their progress
- Providing appropriate pastoral care
- Assessing the quality of our education

Our lawful bases for processing personal data are:

- Public task (the exercise of official authority to provide education.)
- Legal obligation (e.g., reporting to Welsh Government)
- Vital interests (emergencies)
- Consent (e.g., certain uses of images, some optional digital services)

Where we process special category data, our lawful bases are: 2

- Article 9(2)(g) – Substantial public interest, as set out in the Data Protection Act 2018, including:
    - safeguarding of children and individuals at risk
    - equality of opportunity and treatment
    - statutory and government-mandated education functions
- Article 9(2)(h) – Health or social care purposes, where relevant.
- Article 9(2)(a) – Explicit consent, where the processing is voluntary and consent-based.

If you do not give us the information we need when we ask for it, this could have an impact on your child's education and safety.

2. What type of information do we use?

We collect the following types of personal data:

- Contact details for you and your child
- Your child's date of birth
- Your child's gender
- Pupil ID number for our Management Information System
- Your family's composition
- Child's language ability
- Education details
- Images/photographs as part of our school activities
- Information about your child's health
- Your child's racial or ethnic origin

We also use a CCTV system in the school but do NOT record images. This is to keep your child and our employees safe.

Where applicable, we will collect and use the following:

- Free school meals eligibility
- Additional Learning Needs
- Whether your child is Looked After by a local authority

3. Do we use information received from other sources?

The school collects information directly from you, but we also receive information from the following sources:

- Any previous schools your child has attended
- Carmarthenshire County Council • Other local authorities 3
- The NHS

4. Who we share your personal information with

We share your information with the following recipients

- Carmarthenshire County Council
- Welsh Government
- Other schools, where your child leaves our school
- Partneriaeth regional consortium
- Hywel Dda University Health Board (NHS)

- Ceredigion County Council, who provide our Management Information System
- Children and family wellbeing services
- Hospital Trusts
- IT services such as the Welsh government HWB learning platform
- School to Parent Communication Services
- Law enforcement agencies
- Personal data about you and your child will not be transferred outside the UK. Where a transfer is required, we ensure that appropriate safeguards are in place.
- third-party software/applications such as Parent Pay, Class Dojo, SeeSaw, Speakr, Charanga, Winning with Numbers

There are also other specific situations where we may be required to disclose information about you, such as:

- Where the Council is required to provide the information by law
- Where disclosing the information is required to prevent or detect a crime
- Where disclosure is in the vital interests of the person concerned

5. How long we will keep your personal data

We keep personal data in accordance with the school retention schedule which includes guidelines published by the Information & Records Management Society:

https://irms.org.uk/

6. Your Data Protection rights

The UK-GDPR gives parents and pupils certain rights about how their information is collected and used.

Requesting access to your personal data

To make a request for your personal information, or be given access to your child's educational record, contact the school admin (admin@penygaer.ysgolccc.cymru) or the

School Data Protection Officer

Mrs Helen Conway helen.conway@penygaer.ysgolccc.cymru

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'.
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant). ·
- the right to complain to the Information Commissioner if you feel we have not used your information in the right way.

There are legitimate reasons why your information rights request may be refused. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to withdraw consent.

You can also access your child's education record under the Pupil Information (Wales) Regulations 2011.

7. Freedom of Information Act 2000 and Environmental Information Regulations 2004

As a public body, Penygaer Primary School is subject to requests made under the above legislation. Therefore, we have a legal obligation to process any personal data we hold when considering requests under these laws.

However, we will never disclose personal data in our responses to these requests where to do so would contravene the principles of data protection.

8. Contact details

If you wish to discuss the way we are collecting or using your personal data, you can contact us at admin@penygaer.ysgolccc.cymru

The School Data Protection Officer is contactable at: schooldpo@carmarthenshire.gov.uk

9. Complaints

If you have any concerns about how the school handles your personal data, you have the right to make a complaint. We encourage you to raise any concerns with us in the first instance so that we have the opportunity to investigate and resolve the issue.

You can do this by contacting: admin@penygaer.ysgolccc.cymru or 01554 750900

We will acknowledge your complaint within 30 days and will aim to investigate and respond without undue delay. We will keep you informed of the outcome and any actions taken.

If you are not satisfied with our response, or if you believe we have not handled your complaint appropriately, you have the right to lodge a complaint with the Information Commissioner's Office (ICO): Information Commissioner's Office Telephone: 0303 123 1113

For further information about your data protection rights, please refer to the ICO's guidance on individuals' rights under UK GDPR. see the guidance from the UK Information Commissioners Office (ICO)

Signed: Mrs Helen Conway (Headteacher)	
Signed: Mr Richard Samuel (Chair of Governors)	