Privacy notice relating to the processing of personal data by the school, for the maintenance of the Pupil Educational and Curricular Record

(Version 1.2 – 28.08.2025)

Mae'r ddogfen hon ar gael yn Gymraeg / This document is also available in Welsh

About this privacy notice

This privacy notice applies to the processing of personal data by primary, secondary and through schools within Rhondda Cynon Taf (RCT) that are maintained by the local authority (Rhondda Cynon Taf County Borough Council) (RCTCBC). It also applies to the processing of personal data by faith schools within RCT that are voluntary funded.

Click here for a full list of schools covered by this privacy notice.

This privacy notice is provided by RCTCBC for an on behalf of schools under a data protection Service Level Agreement.

Introduction

This privacy notice is intended to provide information about how the school will use (or 'process') personal data about individuals, including current, past, and prospective pupils and their parents, carers or guardians (referred to in the notice as 'parents') for the statutory purpose of maintaining the pupil educational and curricular record.

When processing the personal data, we process only the minimum amount necessary in relation to the purpose.

This notice should be read in conjunction with the school's General Privacy Notice which is available on our website or by contacting the Data Protection Lead

Pupil educational record

Under the Pupil Information (Wales) Regulations 2011 the head teacher must keep an educational record of each pupil.

The educational record consists of information about pupils;

- processed by, or on behalf of, the governing body or a teacher
- originating from or supplied by Local Authority employees
- originating from or supplied by teachers or other employees of the school (e.g. voluntary aided or non-maintained special schools)

The educational record typically consists of information relating to;

- Accidents and incidents
- Additional learning needs
- Attendance and wellbeing
- Behaviour and exclusions
- Safeguarding
- Relevant medical information relevant to education/behaviour
- Correspondence with parents
- Annual reports
- School based complaints

The educational record does not include records processed by a teacher solely for the teacher's own use.

Pupil curricular record

The pupil curricular record is a sub-set of the educational record. It is a formal record of a pupil's academic achievements, skills and abilities and the progress they make at school.

Under the Pupil Information (Wales) Regulations 2011 the head teacher must keep a curricular record of each pupil.

The curricular records typically consist of information relating to the pupils;

- Assessment results
- Examination results

The Data Controller

The school is the data controller for the personal data we process, unless otherwise stated. This includes the personal data processed by the Governing Body, head teacher, individual governors, teachers, teaching assistants and support staff etc.

The school is registered with the Information Commissioner's Office (ICO) as a controller.

How to contact us for data protection matters or concerns

The school's Data Protection Lead is the main point of contact for data protection matters. The Data Protection Lead can be contacted using our normal contact methods; by telephone, email, post and in person at the school.

Click here for the school's contact information.

The Data Protection Officer

RCTCBC provides a data protection support service to the school under a Service Level Agreement, including the provision of a Data Protection Officer (DPO).

The DPO can be contacted in relation to data protection matters. However, we encourage you to contact the school in the first instance. Should you have the need to contact the Data Protection Officer directly you can do so via email to the following email address;

- Information.management@rctcbc.gov.uk

We recommend, when contacting the DPO, you send a copy of the correspondence to the school as the data controller.

The categories of personal data we process

We process the following categories of personal data which form part of the pupil educational and curricular record;

Pupils

We typically process the following categories of personal data relating to every pupil;

- Personal identifiers such as name, unique pupil number, date of birth etc.
- Contact Information such as address, telephone number, email address etc.
- Gender, ethnicity, language, national identity/nationality, country of birth, sexual orientation, free school meal eligibility, child looked after status
- Relevant health and medical information such as doctor's information, child health, dental health, allergies, sight and hearing health, medication, dietary requirements etc.
- Language information – first language, fluency etc.
- Attendance information such as sessions attended, number of absences, absence reasons, previous schools attended etc.
- Assessment and attainment information
- Information relating to home to school transport / collection arrangements
- Images (captured by CCTV)

We may process the following categories of personal data depending on pupil needs and individual circumstance;

- Additional learning needs and disability information
- Safeguarding information such as - court orders, professional involvement.
- Information relating to behaviour and exclusions
- Information relating to accidents and incidents.
- Information relating to school-based complaints.

Parents & Emergency Contacts

We typically process the following categories of personal data which forms part of the pupil educational and curricular record;

- Personal identifiers and contact details such as – name, address, telephone number, place of work (if applicable), email address etc.
- Relationship to the child

We may process the following categories of personal data relating to parents, depending on pupil needs and family circumstance which forms part of the pupil educational and curricular record;

- Information relating to whether a parent is a member of the armed forces
- Legal access to the child and any court orders indicating access rights
- Relevant household/family information such as siblings, childcare arrangements etc.
- Relevant information relating to support service involvement e.g. social services, safeguarding, additional learning needs etc.
- Financial information e.g. relating to payments that are made or due to the school

Why we process the personal data

We process the personal data to undertake our statutory function relating to the creation and maintenance of the pupil educational and curricular record.

Our lawful basis for processing the personal data

Under the General Data Protection Regulation (GDPR), our lawful basis for processing the personal data to undertake our statutory function relating to the creation and maintenance of the pupil educational and curricular record;

- **Legal Obligation** Article (c) – processing is necessary for compliance with a legal obligation to which the controller is subject.

- **Public Task -** Article 6 (e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

- **Substantial public interest** - Article 9 (2) (g) - processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject

The primary legislation, regulations and guidance that supports this includes but is not limited to;

- Pupil Information (Wales) Regulations 2011
- The Education Act 1996
- The Education Act 2002
- Schools Standards and Framework Act 1998
- Further and Higher Education Act 1992, Section 18

Who and where we get the personal data from

We may receive the personal data from the following categories of individuals or organisations;

- Pupils
- Parents
- School staff - head teacher, teachers, teaching assistant, support staff etc.
- Governing Body, Individual School Governors, Independent Panels
- Other schools and educational establishments (where the pupil is moving school, or dually registered)
- Local Authority support services such as the Admissions Team, Catering Service, Transport Service, Local Education Authority Data Team, Attendance & Wellbeing Service, Access and Inclusion etc.
- Local Authority business support services such as Governors Support, Insurance Section, Legal Services etc.
- Safeguarding organisations, services and professionals that may be involved in assessing, supporting or providing services to a pupil and their family (e.g. Local Authority Children's Services, Cwm Taf Morgannwg Safeguarding Board, Health Boards, health professionals etc.).
- Private sector organisations and charities that may be involved in supporting or providing services to a pupil and their family (e.g. CAMHS).

Secondary schools;

- Examination Boards, Assessment providers, Enrichment Programme providers
- Careers Wales
- Student Finance Wales

Who we share personal data with

We may share the pupil educational and curricular record as a whole with;

Who	Purpose
Other Schools and education establishments	• Where the pupil is moving school, or is dually registered, the school has a statutory requirement to transfer the educational record to the new school.

In addition, as outlined above, as the pupil educational and curricular record consists of information relating to a wide range of matters such as attendance and behaviour, wellbeing, additional learning needs, performance, results etc., elements of the record may be shared with statutory and support services for specified purposes. This may include but is not limited to;

Who	Why
Welsh Government	National reporting, assessment etc.
Central South Consortium (via Welsh Government)	Reporting, assessment, school improvement etc.
ESTYN	Inspection purposes
Governing Body / School Governors / Independent Panels	Functions of the Governing Body and Independent Panel
Local Authority - Support Services	The school works alongside, and in conjunction with a number of Local Authority support services to deliver its statutory functions. These include but are not limited to; • Admissions Team - manage schools admissions process, transfers etc. • Transport Service – home to school transport provision • Catering Service – catering provision at the school • Data Team – statutory reporting, financial management • Attendance & Wellbeing Service - record, monitor and address pupil attendance • Access & Inclusion Service - referrals, assessments of need, implement and review ongoing support • Social Services - referrals, assessments of need, implement and review ongoing support Resilient Families Service - referrals, assessments of need, implement and review ongoing support

Cwm Taf Morgannwg Multi-Agency Safeguarding Hub (MASH)	The MASH is a single point of contact for all professionals to report safeguarding concerns, across Cwm Taf Morgannwg. The MASH comprises of staff from the Social Services, Education, Police, Health, National Probation Service and the Community Rehabilitation Company • Safeguarding
Local Authority – Business Support Services	A number of Local Authority services support the business operations of the school. These include, but are not limited to; • Governors Support - support, advice and guidance to the governing body etc. • Human resources – employee services. • Insurance Section – claims handling/management, advice, support, guidance etc. • Legal Services – legal advice, support etc. • Information Management – data protection advice, support etc.
Health and Safety Executive	Reporting of accidents/incidents in compliance with Health and Safety legation.

Secondary schools

Who	Why
Examination Boards	• To facilitate the sitting of exams • To support the exams appeal process
Careers Wales	• Provision of careers advice, support and guidance and faciliting work experience
Universities	• Support pupils in the application process • Provide references
Enrichment Programme providers	• Support pupils enrolled in the programme/scheme
Student Finance Wales	• Support the student finance application
Coleg y Cymoedd	• In the case of dual registration to support Junior Apprenticeships

The information shared and who it is shared with will depend on the pupil's individual needs, support required and those involved. For more information regarding this, please refer to our process specific privacy notices.

Data Processors

A data processor is a company or organisation that processes personal data on behalf of a controller. The school uses data processors that provide services to us. The category of data processors that the school uses in relation to the creation and maintenance of the pupil educational and curricular record is;

- IT system suppliers / service providers

Our data processors act only upon our instruction. They cannot do anything with the personal data unless we instruct them to do so. They will not share the personal data with any organisation apart from us or use it for their own purposes. They will hold it securely and retain it for the period we instruct.

Should you have a specific query relating to our data processors, please contact the Data Protection Lead.

How long we retain the personal data

In keeping with the General Data Protection Regulation storage limitation principle, records are periodically reviewed. Only personal data that is relevant to the record is retained for the entire retention period (e.g. documents that contain assessments, decisions, outcomes etc.). Information that has no long term or evidential value is routinely destroyed in the normal course of business.

As the pupil educational and curricular record contists of information relating to a wide range of matter, such as attendance and behaviour, wellbeing, additional learning needs, performance, results etc., for specific retention periods please refer to our more detailed privacy notices which can be viewed here.

Your data protection rights

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your personal data.

Your right of access

You have the right to ask us for copies of your personal data. This right always applies. There are some exemptions, which means you may not always receive all the data we process. You can read more about this right on the ICO's website.

Your right to get your data corrected

You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete data you think is incomplete. This right always applies. You can read more about this right on the ICO's website.

Your right to get your data deleted

You have the right to ask us to erase your personal data in certain circumstances. You can read more about this right on the ICO's website.

Your right to limit how organisations use your data

You have the right to ask us to restrict the processing of your personal data in certain circumstances. You can read more about this right on the ICO's website.

Your right to object to the use of your data

You have the right to object to us processing your personal data in certain circumstances. You can read more about this right on the ICO's website.

Your right to data portability

This only applies to personal data you have given us. You have the right to ask that we transfer the personal data you gave us from one organisation to another or give it to you. This right only applies if we are processing the personal data based on your consent or under, or in talks about entering a contract and the processing is automated. You can read more about this right on the ICO's website.

You are not required to pay any charge for exercising your rights. We have one month to respond to your request from the date your request is validated. We may extend this period by a further two months if the request is complex or we receive a number of requests from you.

Please contact the school's Data Protection Lead if you wish to make a request.

Your right to make a data protection complaint to the school

You have the right to complain to the school if you believe we have not handled your personal data responsibly and in line with good practice.

If you have a concern, we encourage you to contact the Data Protection Lead in the first instance. Most concerns can be resolved relatively quickly through a simple phone call or email to the school. Should you wish to make a formal complaint you can do so via our complaints policy.

Your right to make a data protection complaint to the ICO

You can also complain to the ICO if you are unhappy with how we have used your data, but we encourage you to contact us first.

The ICO's contact information is:

- Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- Helpline number: 0303 123 1113
- Website: https://www.ico.org.uk

Version Control

Version no	Valid From	Valid To	Comments
1.0	28.09.2022	21.02.2023	Document creation. Final document
1.1	21.02.2023	28.08.2025	Amended to included availability of Welsh version
1.2	28.08.2025		To include dual registration for Junior Apprenticeships