

Privacy notice relating to the processing of personal data, including images and recordings, relating to school events and activities

(Version 1.1 – wef 21.02.2023)



MAE EICH DATA O BWYS

YOUR DATA MATTERS

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 images and recordings, for the purpose of capturing, documenting, promoting, and celebrating school related events and activities.

For the purpose of this privacy notice, a school event and activity may include, but is not limited to;

- School concerts and performances
- Sporting Events e.g. Sports Day, Rugby Match, Netball Match etc.
- Fund raising events e.g. fetes, quiz night etc.
- School trips and site visits.
- Celebratory events e.g. award ceremony.

This privacy notice does not cover the processing of personal data captured by;

- CCTV systems at the school.
- Images and recordings taken for assessment and examination purposes.
- Photographs and recordings taken for personal use by a parent, for example at a school concert.

This privacy notice should be read in conjunction with the school's General Privacy Notice.

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

The categories of personal data we process

We may process the following categories of personal data for the purpose of capturing, documenting, promoting, and celebrating school related events and activities;

- Images
- Voice/Audio
- Basic personal details such as name, class, year etc.
- Details specific to event or activity e.g. in relation to a pupil award ceremony, details of achievement to which the award relates.

Whose personal data we process

We may process the personal data of the individuals that facilitate, participate, or attend the event or activity. This may include but is not limited to;

- Pupils
- Parents, carers, guardians etc.
- School Staff
- Governors
- Visitors
- Volunteers
- Chaperones
- Attendees
- Event/activity provider, facilitator

Why we process the personal data

We process the personal data to;

- document and keep a record of the event or activity
- celebrate the success or achievement of a pupil, staff, class or the school
- promote the school
- promote the event or activity
- communicate with parents, pupils etc.

We may do this through;

- displays at the school e.g. noticeboards, displays
- the school prospectus and other publications

- the school's social media platform
- the school's website
- communications with parents
- school newsletter
- the media e.g. local gazette

Our lawful basis for processing the personal data

Under the General Data Protection Regulation (GDPR), our lawful basis for processing the personal data for the purpose of capturing, documenting, promoting, and celebrating school related events and activities is;

Pupils

- **Consent** - Article 6 (a) – the individual has given clear consent for us to process their personal data for a specific purpose.

Consent may be obtained from the parent, carer, or guardian depending on the age of the child.

Parents, Staff, Visitors, Attendees, Chaperones etc.

- **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.

Individuals will be given the right to object to the processing of their personal data at the start of the event of activity.

Who and where we get the personal data from

We obtain the personal data directly from the individuals during the event or activity.

Who we share personal data with

We may share the personal data, including images and recordings as follows, for the purpose of promoting and celebrating school related events and activities;

- Event, activity provider
- Media outlet e.g. local gazette.

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 categories of data processors that the school uses in relation the capturing, documenting, promoting, and celebrating of school related events and activities is;

- General IT system suppliers / service providers
- School photographer (if the work is outsourced)
- School website provider (if details of the event or activity is published online)
- Social media platform provider (if details of the event or activity is published on social media)
- Publication service provider e.g. company that designs and print of school prospectus.

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

Records of school events and activities will be reviewed periodically including recordings and photographs. Where images or recordings are no longer required for business purposes or historical interest they will be securely destroyed.

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 schools 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	16.08.2022	21.02.2023	Document creation. Final document.
1.1	21.02.2023		Amended to included availability of Welsh version