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Service Area:	Education
Work Area:	Ysgol y Lawnt
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Description of Privacy Notice: This privacy notice will explain how Ysgol y Lawnt will process personal information you provide about yourself if you make a request for information or individual rights request under the Freedom of Information Act (FOI), Environmental Information Regulations (EIR), or Data Protection legislation (DP)

How we will use your information

Purpose and lawful basis for using your information.
Purpose of processing

Ysgol y Lawnt will process your request, the information which relates to your request, your identity and contact details for the purposes of providing you with a response. We will either provide you with the information / right you have requested or we will explain the reasons why we are unable to do so.

The Freedom of Information Act provides a general right of access to recorded information held by a public authority. The Environmental Information Regulations provide a right of access to environmental information held by a public authority.

Data Protection legislation provide data subjects (those who the information is about) a number of rights in respect of information held about them which are outlined in the 'Your Rights' section of this document.

Legal basis for processing

Freedom of Information / Environmental Information Regulations Requests There is a public task requirement on public authorities to process your information as detailed below:

Section 10(1) Freedom of Information Act 2000
Regulation 5(1) Environmental Information

Regulations 2004 In order for the processing of personal data to be lawful under the General Data Protection Regulations 2016, a valid condition from Article 6 of the Regulations must be identified, which is outlined below:

1e. 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;

Data Protection Rights

There is a statutory requirement to process your information, as detailed below:

Articles 12-23 General Data Protection Regulations 2016 In order for the processing of personal data to be lawful under the General Data Protection Regulations 2016, a valid condition from Article 6 of the Regulations must be identified, which is outlined below:

1(c) processing is necessary for compliance with a legal obligation to which the controller is subject.

Data Protection legislation provides extra protection for certain classes of information called 'special personal data'. If any in question falls within the definition of special personal data then an additional condition from Article 9 of the Regulations must be identified, as outlined below:

2g. 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;.

Who will have access to your information?

Identity of Data Controller and Data Protection Officer The Data Controller for your information is Ysgol y Lawnt.

The Data Protection Officer is contracted by the school to Caerphilly County Borough Council. You can contact the school Data Protection Officer on 01443 864049, or by email at dataprotection@caerphilly.gov.uk

Details of main users of your information

Your request, including your identity and contact details, will be distributed to relevant department areas and Governing Body members who may hold the information relating to your request for the purposes of processing your request and providing you with a response.

Ysgol y Lawnt logs requests, distributes requests to relevant department areas and Governing Body members, and responds to requests directly as the Data Controller. Requests for an internal review of Freedom of Information / Environmental Information Regulation responses or complaints in respect of how Ysgol y Lawnt has dealt with a request to enact your rights under Data Protection legislation will be administered by the School directly.

The Corporate Information Governance Unit at Caerphilly County Borough Council supports the process by providing advice on the processing of requests to ensure compliance with the appropriate legislation. For some requests, additional legal advice may be sought from Legal Services.

Ysgol y Lawnt may publish statistical information in relation to requests received and responses issued, but not in a form that identifies the applicant. We may also publish Freedom of Information and Environmental Information Regulation requests received and responses issued, but again, not in a form that identifies the applicant.

Details of sharing your information with other organisations

We may be required to share certain information with specific organisations, but only with a clearly defined reason and an appropriate legal basis under data protection law. We always ensure that the sharing of personal information is securely undertaken.

Organisation	Reason	Lawful Basis
Caerphilly County Borough Council (CCBC)	To provide advice and support on data subject rights under FOI, EIR, and DP. The contracted Data Protection Officer manages data protection complaints or concerns against the school.	Compliance with a contract (Art 6 GDPR)
Information Commissioner's Office (ICO)	Provision of statistics to monitor compliance target rate.	Compliance with a legal obligation (Art 6 GDPR)

Please be aware that copies of your request, response, and any additional relevant correspondence between you and Ysgol y Lawnt may be shared with others (i.e. Information Commissioners Office) if you have made a complaint in relation to the processing of your request. External legal advice may be sought in relation to the processing of your request and your identity will only be released if it is relevant to do so.

Type of Request	Who information is shared with
Freedom of Information (FOI) & Environmental Information Regulations (EIR) Requests	Other organisations and individuals who might be affected by the disclosure of the information you have requested may be consulted prior to a decision being made on the disclosure. Your identity or contact details will not be released.
Data Protection – Subject Access Request	Other organisations and individuals who might be affected by the disclosure of the information you have requested may be consulted prior to a decision being made on the disclosure. Your identity may be released.
Data Protection – Rights in relation to the Rectification, Erasure, and Restriction of personal data	If your request for rectification, erasure, or restriction of personal data is successful, the School have an obligation to inform organisations we may have passed your information, were possible.

Details of any external data processors

Capita GDPRiS (data management)

Student data processed: [e.g. name, contact details, assessment and attendance data]

Captia GDPRiS is a cloud-based data protection monitoring solution used to record and manage data breaches reported, audit progress, and map data held by the School. The solution is a product from Capita SIMS, which is hosted at a Microsoft Azure datacentre in the UK and data is encrypted at rest in cloud storage and as it travels across the internet or within networks.
https://www.capita-sims.co.uk/gdpr

https://www.capita-sims.co.uk/privacy-notice

Requests for information

All recorded information held by the School may be subject to requests under the Freedom of Information Act 2000, Environmental Information Regulations 2004 and Data Protection legislation (General Data Protection Regulations 2016 and Data Protection Act 2018).

If the information you provide is subject to such a request, where possible, the School will consult with you on its release. If you object to the release of your information, we will withhold your information if the relevant legislation allows.

How long will we retain your information?

Details of retention period We hold information securely as determined through statutory requirements or best practice. This is documented in our data retention schedule.

Ysgol y Lawnt will retain your request and our response for 3 years. Some requests and responses may be kept longer, but this will be in an anonymised form.

Your Rights (including Complaints Procedure)

Your rights under data protection law Data Protection laws give data subjects (those who the information is about) a number of rights, which include:
- Right to be informed how personal data is collected, stored, managed, protected, and processed.
- Right of access to request a copy of personal information held of yourself. However, please be aware that information can sometimes be legitimately withheld.
- Right to rectification of inaccurate or incomplete personal data.
- Right to erasure where you have the right to have your personal data erased in certain circumstances. This does not include any personal data that must be retained by law.
- Right to restriction, which allows you to limit the way we use your personal data in some circumstances.
- Right to portability gives an individual the right the receive copies of data provided to a controller in a portable format.
- Right to object to the processing of ones personal data; and the final one is the
- Rights in relation to automated decision making and profiling.

Children and young people have certain rights under data protection legislation, including a general right to be given access to personal data held about them by an organisation. A child or young person is normally deemed to be mature enough to understand their rights of access from the age of 12 years or over. Therefore, the child or young person should either submit an information request themselves directly to the school, or provide a letter of authority to give a third party (i.e. a parent or carer) consent to act on their behalf. A parent requesting information on behalf of a child would need to provide proof of ID and Parental Responsibility.

To enact your rights, please contact Ysgol y Lawnt as detailed at the top of this document. A copy of any individual right request and your response will be kept for 3 years.

Complaints Procedure

If you are unhappy with the way that the School has handled your request / information, you have the right of complaint.

Please contact Ysgol y Lawnt outlining your concerns in the first instance.

If you remain unhappy, you can contact the schools Data Protection Officer on 01443 864322 / dataprotection@caerphilly.gov.uk

You also have the right to ask the Information Commissioner, who enforces and oversees the Data Protection Act in the UK, to assess whether or not the processing of personal information is likely to comply with the provisions of our legislative responsibilities.

Further information on your rights is available from: www.ico.org.uk.