POWYS PUPIL REFERRAL SERVICE

Privacy Notice

Pathway Education Centre
(PRU North)
The Old College
Off Station Road
Newtown
Powys
SY16 1BE

New Start Centre
(PRU South)
Silver Street,
Brecon,
Powys
LD3 8BL

Date of Policy	
Review Date	
Agreed by Management Committee	November 2024
Agreed by Management Committee	November 2025

Privacy Notice (General Data Protection Regulations)

Powys PRUs

In accordance with the UK General Data Protection Regulation (GDPR) this privacy notice sets out how Powys County Council's Pupil Referral Unit (PRU) uses personal data/education related information that it receives about Children and Young People.

Commented [JW1]: WG are separate data controllers, we only need to mention that we share personal data with them.

Background

The PRU collects information about children and young people and their parents or legal guardians when children and young people enrol at the PRU. The PRU also collects information at other key times during the academic year and may receive information from other schools or education providers when children and young people transfer.

The PRU processes the information it collects to administer the education it provides to children and young people. For example:

- the provision of educational services to individuals;
- monitoring and reporting on pupils'/children's educational progress;
- the provision of welfare, pastoral care and health services;
- the giving of support and guidance to children and young people, their parents and legal guardians;
- the organisation of educational events and trips and to inform you about events and other things happening in the PRU
- to keep children safe (food allergies, or emergency contact details)
- the planning and management of the PRU

Powys County Council will also use this information for the following additional purposes:

Commented [JW2]: Helen did mention that the PRU sits under PCC - so essentially PCC are the controller of all the information. Technically then, PCC collects the information and uses the information, although the PRU manages it as a service area

Commented [JW3]: We tend to write either 'Powys County Council' or 'the Local Authority' for clarity

- to monitor, challenge and provide support to PRUs to improve performance and set credible targets
- to support PRUs in the services delivered to children and young people
- to inform and support services provided by the Children and Young People's Partnership (CYPP) and the Powys Youth Service to young people and their families
- to carry out research and inform policy decisions including funding for PRUs
- to monitor the quality and scope of data held by PRUs and provide support to ensure the data held about children and young people is accurate and up-to-date

Powys County Council rely on the following legal bases under Article 6 of the GDPR to process personal data:

Processing is necessary for tasks in the public interest or exercise of authority vested in the controller (the provision of education).

Our lawful basis for collecting and processing pupil information is also further defined under Article 9, in that some of the information we process is deemed to be sensitive, or special, information and the following sub-paragraphs in the GDPR apply:

a) The data subject has given explicit consent.
b) It is necessary to fulfil the obligations of controller or of data subject.
c) It is necessary to protect the vital interests of the data subject.
d) Processing is carried out by a foundation or not-for-profit organisation (includes religious, political or philosophical organisations and trade unions)
e) Reasons of public interest in the area of public health
f) It is in the public interest

As data controllers, the PRU and Powys County Council use the information received for the purposes listed to enable them to carry out data processing necessary for the performance of a task carried out in the public interest and in the exercise of official authority.

Commented [JW4]: Comment above will help me revise this section for you

What information is held by the PRU and Powys County Council?

The sort of personal information that will be held includes:

- personal details such as name, address, date of birth, child/young person identifiers and contact details for parents and guardians; photographs
- characteristics (such as ethnicity, language, and free School meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- additional learning needs
- medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous school's attended)
- assessment and attainment (such as key stage and results, post 16 courses enrolled for and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- information about the involvement of social services with individual children and young people where this is needed for the care of the child/young person
- We may also hold data about pupils that we have received from other organisations, including other Schools, local authorities and the Welsh Government.

Who does the PRU and Powys County Council share your information with?

Information held by the PRU and Powys County Council on children and young people, their parents or legal guardians may also be shared with other organisations when the law allows and providing all appropriate steps are taken to keep the information secure, for example:

- other education and training bodies, including School's, when children and young people are applying for courses or training, transferring Schools or seeking guidance on opportunities;
- bodies doing research for the Welsh Government, LA and Schools as long as steps are taken to keep the information secure;
- central and local government for the planning and provision of educational services;
- social services and other health and welfare organisations where there is a need to share information to protect and support individual children and young people; including Police Forces, Courts and Tribunals and security organisations.

• Management Information System (MIS) providers in order to ensure that system functionality and accuracy is maintained;
• The Council's approved suppliers of the PRUs 'cashless' system to ensure all pupils, parents & guardians with parental responsibility and PRU staff are able to use it as appropriate;
• Powys Teaching Health Board to support the provision of an effective School Nurse Service and other related health services for young people and their families;
• GL Assessment (https://www.gl-assessment.co.uk/about-us/) for the administration of annual cognitive ability tests (CATs) and other similar diagnostic tools to support individual learning;
• The Mid Wales Education Partnership (MWEP) to support regional statistical analysis as required by Welsh Government;
• various regulatory bodies, such as ombudsmen and inspection authorities, where the law requires that information be passed on so that they can do their work;
• The Office of National Statistics (ONS) in order to improve the quality of migration and population statistics.

Information is also shared with Careers Wales in accordance with the provisions laid down in The Education Act 1997 (Section 43 & 44) and The Learning & Skills Act 2000 (Sections 123 & 138).

In addition, Powys County Council shares information with Welsh Government about pupils directly from PRUs normally as part of statutory data collections which consists of the following:

• Pupil Level Annual School Census (PLASC)
• Educated other than at School (EOTAS) pupil level collection
• National data collection (NDC)
• Attendance collection
• Welsh National Tests (WNT) data collection

In addition to the data collected as part of PLASC, the Welsh Government and Local Authorities also receive information regarding National Curriculum assessments, public examination results, and attendance data at individual pupil level which comes from PRUs and /or Awarding Bodies (e.g. WJEC).

Sharing personal information with curriculum-based software suppliers

The PRU may provide limited personal (but not sensitive) information to external companies providing a curriculum-based resource (which may be on-line) which is deemed to have educational value. In these circumstances the PRU will ensure that all reasonable precautions are taken to preserve the security of the data in line with current legislation and that the external supplier meets all legal requirements regarding the handling of this data as specified in a formal written agreement between the PRU and the supplier.

The PRU will endeavour to ensure that information is kept accurate at all times. Personal information will not be sent outside the United Kingdom unless it is protected by the

enhanced security arrangements associated with the Welsh Government's digital learning platform – 'Hwb'. Details are available at: https://hwb.gov.wales/privacy

Companies and their applications currently used by the PRU in this way are:

a) Google – Emails, Google drive, Google classroom. Allows for collaborative working inside and outside PRU as well as Archiving and small factor databases.
b) Teacher Centre – The PRU's core Information Management System – holds all core student data including contact information and results.
c) CCTV – Provides building security and evidence if damage occurs – Inhouse solution with onsite monitoring
d) Examination Bodies – WJEC, OCR, Pearsons, AQA – Provides GCSE/GCE based awards/courses.
e) Tyfu – Powys Central data base for additional learning needs
f) ParentPay – PCC Provided online payment system for PRU meals and trips. Contains student information, year group, age, dietary requirements.
g) NRS software – PCC provided Canteen till system – includes student information, picture age, dietary needs, balance on ParentPay account, meals chosen by students and fingerprints for procuring meals.
h) GCSEPod – Teachercentric – Provides revision podcasts for GCSE students – we share student names with this service – students then sign up.
i) Schoop – Provides notification system to parents
j) Mathswatch - Students have their own logins and passwords. Student names and their marks for homework are held.
k) HWB – Welsh Government education portal holding data and providing additional services to pupils and staff

*****This list is not exhaustive.*****

How long will this data be kept?

The PRU, Powys County Council and Welsh Government will keep this data until the pupil's 25th birthday or for the duration of the criteria which underpin the statutory regulation. After this point the data will be anonymised in line with best practices and used only for statistical and research purposes.

Further information about how Powys County Council processes personal data, how to exercise data subject rights, and Powys County Council's Data Protection Officer's contact details can be found here: Data Protection and Privacy - Powys County Council
If you wish to discuss anything else, please contact:

Pupil Referral Unit – North	**Pupil referral Unit – South**
TBC Uned Cyfeirio Disgyblion Y Drenewydd / Newtown Pupil Referral Service Canolfan Addysg Pathway / Pathway Education Centre Yr Hen Goleg / The Old College Oddi ar Ffordd yr Orsaf / Off Station Road Y Drenewydd / Newtown Powys / Powys SY16 1BE / SY16 1BE Tel / Ffôn | 01686 617190	Jamie Yorath Uned Cyfeirio Disgyblion Aberhonddu / Brecon Pupil Referral Service Stryd Arian / Silver Street Llanfaes / Llanfaes Aberhonddu / Brecon Powys / Powys LD3 8BL / LD3 8BL Tel / Ffôn | 01874 624488