

## **Privacy Policy**

Your School and Renfrewshire Council take the privacy of your personal data very seriously. You have a right to be informed about how the Council uses information about you.

### **What is GDPR and the Data Protection Act 2018 and What Does it Mean for me as a Parent/carer?**

A privacy notice is a statement about how personal information obtained by your school and the Council will be used. Your school will have to make sure that when it requires information from you that there is a clear explanation of what is required, what it will be used for and how long the information will be retained for.

Annually this will happen when the data check is undertaken and when contacting you about educational trips and excursions.

We have set out below what information we collect, how we collect it, what we do with it, who we share it with and why. This privacy notice will also enable your personal data to be shared with other departments in the Council and only as appropriate e.g. with educational psychologists, the additional support needs team or social work.

There are key external agencies with whom we need to share your data in order that the Council and specifically Education Services has a secure system to manage your personal data. These are listed on the privacy notice too. Your school will be able to provide you with further explanation about what these key agencies are if you require further information

You can contact Renfrewshire Council on 0300 300 0300 if you have any questions about how your school look after your information. The *Data Protection Officer, Allison Black, Managing Solicitor*, can be contacted on:

*dataprotection@renfrewshire.gov.uk*

### **Privacy and Data Protection Statement**

Renfrewshire Council and Renfrewshire Schools have created this privacy statement in order to demonstrate our firm commitment to privacy. The following discloses the information gathering and dissemination practices for Renfrewshire Schools.

We need to handle personal information about you so that we can provide better educational services for you and your child. This is how we look after your information.

When we ask you for personal information, we will:

- make sure you know why we need it
- ask only for what we need
- protect your personal information and make sure nobody has access to it who shouldn't

- take proportionate precautions to prevent the loss, misuse or alteration of your personal information
- let you know if we share it with any other organisations to give you better public services
- make sure we don't keep it longer than necessary, and
- not make your personal information available for commercial use without your permission.

In return, we ask you to:

- give us accurate information, and
- tell us as soon as possible if there are any changes, such as a new address.

This helps us to keep your information reliable and up to date.

### **Your rights**

You have the following rights:-

- The right to be informed about how your information will be used.
- The right of access to your personal information.
- The right to rectification, which is the right to require the Council to correct any mistakes.
- The right to request the erasure of any personal information held by the Council where the Council no longer has legal reason to hold the information.
- The right to request that your information is only processed in certain ways.
- The right to data portability.
- The right to object to the Council processing your personal information.

These are not absolute rights as there may be circumstances where we are legally obliged to process your information in a particular way. Some examples are listed below.

**Consent** – We will not ask for consent in cases where we need to process your information to carry out our public functions. If we have asked for your consent to process your information, you have the right to withdraw this, in whole or in part, at any time. We will explain any consequences of this to you, including any impact on the service we are delivering.

**Transferring our information outside the UK or European Economic Area** - We will not transfer personal data outside the European Economic Area (EEA) unless this cannot be avoided. The Council will only transfer data outside the UK and the EEA when it is satisfied that the party which will handle the data and the country it is processing it in will provide adequate safeguards for personal privacy. On the occasions when it does transfer your information outside the UK or the European Economic Area, the Council will inform you.

**How long do we keep your information?** - We will only keep your information for as long as necessary. Full details of how long the council usually retains your

information can be found in the Council's Retention and disposal Schedule which is published on the Council's website here:

<http://www.renfrewshire.gov.uk/recordsmanagement>

## **Data Protection**

Any personal data you provide will be kept by relevant staff in the appropriate service area of Renfrewshire Council, and that data will be processed in accordance with the provisions Data Protection laws. We will not use the personal information you provide us with for marketing purposes. You can make a formal request (known as a subject access request) for the following information:

- clarification that your personal data is being processed by the Council
- a description and copies of such personal data
- the reasons why such data is being processed
- details of to whom it is or may be disclosed

If you wish to make a subject access request, please contact:

*Laura Baillie*

*Resources Support Manager*

*Children's Services*

*Renfrewshire Council*

[laura.baillie@renfrewshire.gov.uk](mailto:laura.baillie@renfrewshire.gov.uk)

01416187185

## **Who will process the personal information?**

The personal information provided will be used by Renfrewshire Council.

## **What will the personal information be used for?**

The personal information will be used by the Council to provide the identified young person with an education. The personal information will be used to:

1. support pupil learning;
2. monitor and report on pupil attainment and achievement in relation to the national improvement framework issued by Scottish Government;
3. provide appropriate pastoral care to support health and wellbeing; and
4. assure the quality of our education services in line with national expectations from Education Scotland.

## **What is the Council's lawful basis for using the personal information?**

The Council has a legal obligation to ensure that there is an adequate and efficient school and further education system within Renfrewshire Council. If you do not

provide us with the personal information we have asked for then the Council will not be able to provide this statutory education to the pupil.

This legal obligation is set out under:

Education (Scotland) Act 1980

Children and Young People (Scotland) Act 2014

When necessary to support the pupil's access to education and meet this legal obligation, the personal information may be shared internally between departments of the Council. Personal information about pupils can be shared with Social Work and Educational Psychology in order to put in place support for learning.

To meet the requirements of the Education (Scotland) Act 1980, the personal information will also be shared with:

SEEMIS, the Council's Education Management Information System (MIS) provider. This sharing is required in order that the Council has a secure and effective way to record information about the Council's pupils.

Scottish Qualification Authority (SQA), to enable schools to process personal data for exams in S4 – S6.

Further Education (FE) Colleges, to enable placements at FE Colleges Senior Phase programme in S4 – S6 as part of the programme for vocational qualifications.

Health professionals where a pupil requires urgent medical attention, for example on a Council activity or excursion.

Some pupil data may be processed on the Council's behalf by external contractors. In any such case, there will be a binding agreement that they will keep this data secure and process this only for the educational purpose instructed by the Council.

### **How long will the personal information be held for?**

For full details of Renfrewshire Council's retention schedule can be found here:

<http://www.renfrewshire.gov.uk/media/4584/Records-Retention-Schedule/pdf/RenfrewshireCouncilRetentionSchedule.pdf>

Once the Council no longer needs to keep your information, it will be securely destroyed.

Right to complain - When we ask you for information, we will abide by all relevant legislation, including GDPR and the Data protection Act 2018. However, if you are unhappy with the way we process your personal data you have the right to complain. Any complaints regarding your data should be addressed to the Data Protection Officer, Allison Black on [dataprotection.gov.uk](mailto:dataprotection.gov.uk). If the matter is not resolved, you can contact the Information Commissioner's Office, who can also provide independent data protection advice.

The address and contact details for the Information Commissioner's Officer are:

*45 Melville Street*

*Edinburgh*

*EH3 7HL*

*Telephone: 0131 244 9001*

*Email: scotland@ico.org.uk*

If you do not have access to the internet, you can contact us on 0300 300 0300 for hard copies of any of this information.

**Details on how to contact the Council's Data Protection Officer**

Should you have any questions or concerns about the Council's handling of your personal data you can contact the Council's Data Protection Officer:

*Allison Black*

*Managing Solicitor (DPO)*

*Renfrewshire House*

*Cotton Street*

*Paisley*

*PA1 1TT*

*Email: dataprotection@renfrewshire.gov.uk*

*Telephone: 0300 300 0300*