



## PRIVACY NOTICE

### ABOUT US

The Wallace High School is the data controller of the personal information we hold about our pupils (current, past and prospective), their parents/families/carers/legal guardians, our staff and friends / supporters / volunteers of the school. This means that we are responsible for deciding how we hold and use the personal information which we collect.

We are required under the General Data Protection Regulation (GDPR) to notify you of the information contained in this privacy notice.

We collect and use pupil information under the Education Act (Northern Ireland) 2014 and other legislation. You may find the specific legislation at <https://www.education-ni.gov.uk/department-education-legislation>.

The majority of pupil information you provide to us is information which you are legally obliged to provide but some pupil information is provided to us on a voluntary basis. When collecting information from you we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

We may update this notice at any time but if we do so, we will inform you as soon as reasonably practicable.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the GDPR.

If you have any questions about this privacy notice or how we handle personal information, please contact the Principal who will deal with your query. The Principal can be contacted on

Email: [school@wallacehigh.org](mailto:school@wallacehigh.org)  
Post: The Wallace High School  
12a Clonevin Park  
Lisburn  
BT28 3AD  
Phone: 02892 672311

Our Data Protection Officer the Education Authority and it monitors the school's data protection procedures to ensure they meet the standards and requirements of the GDPR. Please contact the EA Data Protection Officer at [DPO@eani.org.uk](mailto:DPO@eani.org.uk) (028) 9056 6200.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO's details are as follows:

**The Information Commissioner's Office – Northern Ireland**

3rd Floor  
14 Cromac Place,  
Belfast  
BT7 2JB

Telephone: 028 9027 8757 / 0303 123 1114

Email: [ni@ico.org.uk](mailto:ni@ico.org.uk)

**HOW DO WE COLLECT AND HOLD PERSONAL INFORMATION?**

Pupils (current, past and prospective) and their families/carers/legal guardians

We collect some personal information about our pupils and their families/carers/legal guardians during a pupil's application process to the school. We will sometimes collect additional information from third parties such as the Education Authority, Department of Education, examination board or previous school attended by a pupil.

We mainly collect personal information about our pupils and their families/carers/legal guardians throughout the course of the pupil's time at the school, for instance when completing educational visit consent forms, from statutory curriculum assessments and throughout our relationship with a pupil when we are exercising our legal obligations as a public educational body and during our pastoral care.

**Staff**

We collect personal information about employees through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, or background check agencies.

We will collect additional personal information in the course of job-related activities throughout the period of you working with us.

If you fail to provide certain information when requested, we may not be able to comply with our legal obligations (such as to ensure the health and safety of our employees).

### Alumni / Friends / Supporters / Volunteers

Information we hold about alumni, friends and supporters comes from a number of sources. A significant proportion of the information has been provided by you to the school (e.g. by filling out a form in person or on the school website, by making a donation or by corresponding with us via email, social media, telephone or post). If you were a pupil at Wallace, some of your information is transferred from your student record to our alumni, friends and supporter database.

To augment the information that you provide and to ensure the data we hold about you is accurate we will consult publicly available information sources such as company websites, social media, news articles and Companies House.

### WHAT PERSONAL INFORMATION DO WE COLLECT, STORE AND USE?

#### Pupils

Personal information is information that identifies you and relates to you. We will collect, store and use the following categories of personal information about our pupils:

- Personal information (such as name, age, date of birth, photographs and unique pupil number)
- Contact information (such as address, emergency contact information and telephone number)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Assessment information (such as statutory assessment process, GCSE and post-16 qualifications and standardised tests provided by commercial companies)
- Exclusion and behavioural information
- CCTV footage captured in school and other information obtained through electronic means
- Non-sensitive characteristic information (such as free school meal eligibility)
- Special categories of information (such as ethnicity, language, country of birth, nationality, information regarding health, special educational needs, allergies and disability).
- Preferences/permissions e.g. use of plasters

#### Parents/Families/Carers/Legal Guardians

We will collect, store and use the following categories of personal information about our parents/families/carers/legal guardians:

- Personal information (such as name, age, date of birth and photographs)
- Contact information (such as address and telephone number)
- Financial information (such as bank account details and payment history)
- CCTV footage captured in school and other information obtained through electronic means

### Staff

We will collect, store and use the following categories of personal information about school employees:

- Personal information (such as name, employee or teacher number, national insurance number, next of kin details and emergency contact information, photographs, bank account details and tax status information)
- Special categories of data including characteristics information (such as gender, age, ethnic group, trade union membership, information regarding your health and AccessNI Enhanced Disclosure application and outcome)
- Recruitment information (such as copies of references, information included in a CV or letter as part of the application process)
- Contract information (such as start dates, hours worked, post, roles and salary information, annual leave, leaving date and your reasons for leaving)
- Performance information (including training records and professional memberships)
- Disciplinary and grievance information
- Work absence information (such as number of absences and reasons, including in respect of parental leave)
- Qualifications (and, where relevant, subjects taught)
- CCTV footage captured in school and other information obtained through electronic means (such as swipe card records)
- Biometric data (used for canteen systems)
- Information about your use of our information and communications systems

### Alumni / Friends / Supporters / Volunteers

Personal information is information that identifies you and relates to you. We will collect, store and use the following categories of personal information about our alumni, friends and supporters:

- Personal information (e.g. name, age, date of birth and photographs)
- Contact details (e.g. postal address, email address and phone number)
- Education history (e.g. school/university attended and dates of study)
- Details of interaction with the school (e.g. attendance at events)
- Family information (such as the name of your partner or spouse and whether your siblings attended the school)
- Personal data provided for a specific purpose (e.g. disability and dietary preferences for event management purposes)

- Communication preferences
- Financial details (e.g. history of donations made to the school, bank account details and payment information)
- Career information (e.g. occupation and achievements—in and outside of work)
- Information relating to relevant hobbies and areas of interest
- Other information (e.g. relationship with other alumni, friends and supporters)

### WHY DO WE COLLECT, STORE AND USE THIS INFORMATION?

Pupils (current, past and prospective) and their families/carers/legal guardians

We will only use personal information when the law allows us to. Most commonly, we will use personal information relating to our pupils and their parents/families/carers/legal guardians where we need to comply with our legal obligations and where it is needed in the public interest for us to exercise our authority as a public educational body.

In some cases we may use personal information where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example, the school has a legitimate interest in providing pupils with an education, safeguarding and promoting pupil welfare, facilitating the efficient operation of the school.

We may also use your personal information, less frequently to protect a pupil's or their family's interests (or someone else's interests). For example, when investigating a complaint made by another pupil.

We keep personal information electronically on the School's information management systems, the School's IT network, or manually in indexed filing systems.

Situations in which we will use personal data, including special category data, include:

- **Teaching & Learning**

For example:

- to monitor and report on pupil progress
- to provide appropriate pastoral care

- **Statutory Returns**

For example:

- to monitor equal opportunities

- **Safeguarding & Child Protection**

- **Security**

For example:

- to safeguard pupils
- to manage a pupil's absence

- **Business Continuity**

For example:

- to assess the quality of our services

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- **Communications**

For example:

- to foster links between the school and the local community, including fundraising events

For example:

- to comply with health and safety obligations
- to comply with the law regarding data sharing

- **Access to Systems**

For example:

- to support pupil learning

- **Sound Financial Management**

For example:

- to provide more efficient means of payment for school facilities such as catering services

## Staff

The Wallace High School collects and uses your personal information primarily to allow us to perform our contract with you. For example:

- Making a decision about your recruitment or appointment
- Determining the terms on which you work for us
- checking you are legally entitled to work in the UK
- paying you and, if you are an employee or deemed employee for tax purposes, deducting tax and National Insurance contributions (NICs)
- enrolling you in a pension arrangement in accordance with our statutory automatic enrolment duties
- administering our contract of employment with you
- business management and planning, including accounting and auditing
- conducting performance reviews, managing performance and determining performance requirements
- making decisions about salary reviews and compensation
- assessing qualifications for a particular job or task, including decisions about promotions
- gathering evidence for possible grievance or disciplinary hearings
- making decisions about your continued employment or engagement
- making arrangements for the termination of our working relationship
- education, training and development requirements
- dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work
- ascertaining your fitness to work

- managing sickness absence
- complying with health and safety obligations
- to monitor your use of our information and communication systems to ensure compliance with our IT policies
- to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution
- to conduct data analytics studies to review and better understand employee retention and attrition rates
- equal opportunities monitoring

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

We have a legal right to collect and use personal information relating to our staff, for example:

- to enable the development of a comprehensive picture of our workforce and how it is deployed
- to inform the development of recruitment and retention policies
- to enable individuals to be paid
- to administer school property
- to maintain our own accounts and records
- to carry out fundraising
- to support staff training
- to provide appropriate pastoral care
- to assess the quality of our operations
- to comply with the law regarding data sharing

We may also collect and use your personal information in order to meet legal requirements set out in the General Data Protection Regulation and UK law, including:

- Education and Libraries (NI) Order 1986
- Education Reform (NI) Order 1989
- Education and Libraries (NI) Order 1993
- Education (NI) Order 1996
- Education (NI) Order 1997
- Education (NI) Order 1998
- Education and Libraries (NI) Order 2003
- Special Educational Needs and Disability (NI) Order 2005
- Education (NI) Order 2006
- Education Act (NI) 2014

#### [Alumni / Friends / Supporters / Volunteers](#)

In some cases, we may use personal information where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental

rights do not override those interests. For example, the school has a legitimate interest in keeping in touch with past pupils to provide them with information and support. The school also has a legitimate interest under its charitable purpose as an education provider to keep in touch with prospective, current and past supporters in order to raise funds.

We keep personal information electronically on the school's information management systems, the school's IT network, or manually in indexed filing systems. Situations in which we will use personal data include:

- sending you school, alumni and supporter updates (e.g. e-zines and newsletters)
- conducting research (e.g. sending out surveys)
- sending you details of volunteering opportunities
- providing services including access to school facilities
- inviting you to alumni, friends and supporter events
- sending you information relating to fundraising appeals and requests for donations
- analysis and research in order to improve our understanding of our alumni, friends and supporters, inform our fundraising strategy and target our communications more effectively
- internal record keeping, including the management of any feedback
- administrative purposes (e.g. in order to process a donation you have made or to administer an event you have registered for or attended)

If we ask for your consent to use personal information, you can take back this consent at any time. Please contact the school if you would like to withdraw any consent you have given.

## **CONSENT**

Whilst the majority of the personal data provided to the school is required for us to comply with our legal obligations, some of that information is provided on a voluntary basis through parental consent (namely, a parent's/carer's/legal guardian's express agreement). A pupil aged 13 or over is considered capable of giving consent themselves and will not require express agreement from a parent/carer/legal guardian. However, if a child is not considered capable of giving consent themselves for example, due to an identified special educational need, an adult with parental responsibility may exercise the child's data protection rights on their behalf.

Where we need consent, for example for collecting biometric data, the school will provide the person with parental responsibility for a pupil or, if aged 13 or over, the pupil themselves, with a specific and clear notice which explains the reasons why the data is being collected and how the data will be used. You should be aware if you do not consent to our collection of this type of data, this will not affect the standard of education we deliver to the pupil.



If we ask for your consent to use personal information, you can take back this consent at any time. Please contact the school if you would like to withdraw any consent you have given.

Please be aware that we do not need to obtain parental consent if personal data is to be processed for the purposes of obtaining counselling services for the child.

### **HOW LONG IS THE INFORMATION STORED FOR?**

We will only keep personal information for as long as necessary to fulfil the purposes we collected it (for example, to educate and look after pupils) and including for the purposes of satisfying any legal, accounting, or reporting requirements.

We do not store personal data forever; we only hold pupil and family data for as long as we are legally able to do so. However, sometimes we will keep personal information for historical reasons (e.g. year group or sports team photographs) but you will always have a right to ask for it to be destroyed.

This is a link to the Department of Education Document Retention and Disposal Policy which can be found at <https://www.education-ni.gov.uk/publications/disposal-records-schedule>. This will give you more information about how long we keep personal information.

In determining the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

### **Alumni / Friends / Supporters / Volunteers**

In support of a life-long relationship with Wallace High School we retain alumni, friends and supporter information until an individual tells us that they do not wish to receive further communications from the school and wish their name to be removed from the alumni, friends and supporter database. We will retain some information to ensure our historical records are complete and we do not contact you in future.

Consent can be withdrawn at any time by writing to the Principal at the school address.

### **DATA SECURITY**

We have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or

disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a need to know. They will only process personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator (currently the Information Commissioner's Office) of a suspected breach where we are legally required to do so.

### WHO WE SHARE PUPIL INFORMATION WITH

We may have to share pupil and their family's data with third parties, including third-party service providers and other bodies such as:

- the new school/s that the pupil attends after leaving us
- the Department of Education
- the Education Authority for Northern Ireland
- Northern Ireland Council for Curriculum Examinations and Assessments
- The Board of Governors
- General Teaching Council for Northern Ireland
- Youth Council for Northern Ireland
- Exceptional Circumstances Body
- Department of Health and Health & Social Care Trusts
- PSNI
- C2K School Management Information System
- Data Systems such as GCSE Pod, Hodder Education, Accelerated Reader
- Examination Boards such as AQA, CCEA and Excel
- Commercial standardised test providers (GL Assessment).

### WHY WE SHARE PUPIL INFORMATION

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so. We only permit access to personal data for specified purpose and in accordance with our instructions.

We are required to share pupils' data with the Department of Education and/or the Education Authority on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring. We also share information with the NHS or a pupil's destination upon leaving school.

### PUPILS AGED 13+:

Once our pupils reach the age of 13, we also pass pupil information to the Education Authority and/or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds.

This enables them to provide services as follows:

- youth support services
- careers advisers

A parent, carer or guardian can request that **only** their child's name, address and date of birth is passed to the Education Authority or provider of youth support services by informing us. This right is transferred to the child/pupil once he/she reaches the age 16, provided that the child/pupil remains capable of exercising that right.

### PUPILS AGED 16+:

We will also share certain information about pupils aged 16+ with Department of Education and/or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds.

This enables them to provide services as follows:

- post-16 education and training providers
- youth support services
- careers advisers.

### SCHOOLS CENSUS

The Department of Education has a legal right to ask for particular information under the Education and Libraries (NI) Order 2003 and is referred to as the "School Census". This information includes information on pupil characteristics such as date of birth, gender, ethnicity, religion, free school meal entitlement and special educational needs status. A number of statistical releases are made available through the Department of Education website covering data on enrolments, participation rates, pupil teacher ratios, school leavers, attendance and school performance

### WHO WE SHARE SCHOOL WORKFORCE INFORMATION WITH

We may have to share your data with third parties, including third-party service providers and other bodies such as:

- Education Authority
- Council for Catholic Maintained Schools
- Comhairle na Gaelscolaíochta
- The Department of Education Northern Ireland
- General Teaching Council for Northern Ireland
- Northern Ireland Council for Curriculum Examinations and Assessments
- Education Training Inspectorate
- PSNI
- Information Commissioner's Office
- C2K and Capita

### WHY WE SHARE SCHOOL WORKFORCE INFORMATION

We will share your personal information with third parties where required by law or where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

### WHO WE SHARE ALUMNI, FRIENDS AND SUPPORTER INFORMATION WITH

We may have to share alumni, friends and supporter information with third parties, including third-party service providers and other bodies such as:

- C2K (school management information system)
- Data Systems such as Schoolcomms, MailChimp and Microsoft Office 365
- Connectco (stakeholder engagement and fundraising partner)

We will not share your information with anyone without consent unless the law and our policies allow us to do so. We only permit access to personal data for specified purpose and in accordance with our instructions.

### TRANSFERRING INFORMATION OUTSIDE THE EEA

We transfer personal information outside of the EEA (European Economic Area), for example, when we ask you and/or your child to use certain software applications. We have listed below instances where international transfers may happen and the country the personal information will be sent to:

Why is personal information being transferred? E.g. Name of Application	What type of personal information is being transferred?	Country to which personal information is transferred
Google G Suite (Email, Docs)	Forename and Surname	USA
Securly (Internet filtering)	Forename and Surname	USA

Whenever we transfer your personal information or that of your child outside of the EEA, we ensure that it is protected to the same standard as it would if it remained

inside the EEA. Please contact the Principal if you would like further details on how we transfer your personal information outside of the EEA.

### **YOUR DUTY TO INFORM US OF CHANGES**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

### **YOUR RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION**

Under GDPR, pupils/parents/families and carers, staff and volunteers have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact the Principal on [school@wallacehigh.net](mailto:school@wallacehigh.net)

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Under certain circumstances, by law a parent/carer/legal guardian or a child over the age of 13 (who is considered competent to do so) has the right to:

- **Request access** to personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and your child and to check that we are lawfully processing it. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- **Request correction** of the personal information that we hold about you and your child. This enables you to have any incomplete or inaccurate information we hold corrected.
- **Request erasure** of personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of personal information where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing you and your child's personal information for direct marketing purposes.
- **Request the transfer** of your personal information to another party, for instance a new school.