

PRIVACY NOTICE

RELATING TO PHOTOGRAPHS AND VIDEO RECORDINGS CAPTURED IN SCHOOL

Produced by

**Merthyr Tydfil County Borough Council
Information Governance Team**



Cyngor Bwrdeistref Sirol
MERTHYR TUDFUL
MERTHYR TYDFIL
County Borough Council

VERSION SCHEDULE

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1. IMPORTANT INFORMATION

This notice informs you how data relating to you is used by our school. Specifically, how we use your data when capturing images and recordings, for documenting, promoting, and celebrating school related events and activities.

Please [click](#) here to see the full list of schools covered by this notice.

This notice has been created by Merthyr Tydfil County Borough on behalf of the schools. This notice does not form part of any contract to provide services. We may update this notice at any time. If we do, we will ensure that an updated copy of this notice is made available to you as soon as reasonably practical.

It is important that you read this notice together with our data protection policy and full privacy notice which contains more information about our legal responsibilities.

2. WHO WE ARE

The school is responsible for deciding how we use the personal data we collect. This means that we are a data controller. Under the data protection laws we must tell you how we are using your personal data which is why we have created this notice.

Merthyr Tydfil County Borough Council provides data protection support to schools under a service level agreement, this includes the appointment of a Data Protection Officer.

The Data Protection Officer can be contacted in relation to your data protection concerns using the following contact details:

Address: Merthyr Tydfil County Borough Council, Information Governance Team, Civic Centre, Castle Street, Merthyr Tydfil, CF47 8AN
Email: data.protection@merthyr.gov.uk
Tel: 01685 725000

We would kindly ask you to contact the school in the first instance, however if this is not possible, please ensure that you copy your correspondence to the school as we are the data controller.

3. WHAT PERSONAL DATA IS USED

The school takes pride in the accomplishments of our pupils, and we enjoy capturing these important memories and showcasing them around the school. We also take great pleasure in informing parents, guardians, and families of our pupils accomplishments during school time, key events and as extracurricular activities.

For us to celebrate the success of our pupils we may process the following types of personal data for the purpose of capturing, documenting, promoting school related events and activities:

- Photographs and video recordings
- Voice/Audio recordings
- Basic personal details such as name, class, year etc.
- Details specific to an achievement, event or activity such as an award ceremony (pupil of the week), or details of the achievement to which the award relates (excellent work in class)

For further information on how we use this data please refer to section 4 below.

4. WHOSE PERSONAL DATA IS USED AND HOW

We collect the personal data detailed in section 3 directly from the individuals who have attended the event or activity. We may also receive personal data from event organisers or a service provider, such as a photographer or videographer. There may also be occasions where the school received details of pupil achievements from parents, guardians, carers etc.

To celebrate school events and the achievements of our pupils we may use personal data relating to, but not limited to:

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

If any external person does not wish to be included in our documentation relating to these events, they will need to notify the school prior to attending.

We will only capture the personal data detailed in section 3 for the following reasons:

- To promote the school activities and events
- To keep a record of an event or activity within the school, such as evidence illustrating the pupils performing an educational task
- To celebrate the success and achievements of our pupils, staff, a particular class, or the group of pupils who participated in the event or activity
- To communicate with parents, pupils, carers, guardians etc.

To promote our school events and celebrate the success of our pupils we may use:

- Exhibits at the school this may include specific events to showcase the pupils work and achievements, alternatively we may use the school noticeboards and displays which are located onsite.
- Within the school prospectus and other publications
- We may also post the achievements of our pupils on the school's social media platforms such as Facebook, Twitter, YouTube etc.
- We also post achievements of our staff and pupils on the school's website
- We may provide specific updates, relating to the daily activities the pupils have participated in, using our communication platforms with parents
- The school newsletter
- In the media such as local newspapers including the Merthyr Express, Wales Online
- Videos or films which have been stored on a CD or other electronic device which has been made available to parents, carers, guardians etc.

5. LEGAL BASIS FOR PROCESSING

We will only use your personal data if we have a specified reason under the data protection laws. This includes the reasons set out under the General Data Protection Regulations and where relevant the Data Protection Act 2018. We will use your personal data in the following circumstances:

Article 6(1)(e) which relates to a public task, this specifically relates to the school's use of the pupils personal data whilst participating in school activities.

Article 6(1)(f) which relates to our legitimate interests provided your interests and fundamental rights do not override those interests. This relates specifically to the use of personal data in our promotional materials and advertising pupil success.

If parents do not wish for their child to be included in our promotional materials or if they wish for them to be excluded from any social media posts, you have the option to opt-out of this activity. You will be required to notify the school immediately if you would like to opt your child out.

6. SHARING YOUR PERSONAL DATA

We may share the personal data, which will include photographs and video recordings to promote and celebrate the school's events and activities with:

- The Local Authority – Merthyr Tydfil County Borough Council
- The event or activity provider, which may include:
 - sport providers
 - charities
 - authors
 - drama companies
 - other public authorities such as the police force or fire service
 - other organisations.

The school will inform parents if we are holding an event which is hosted by external organisations.

- Other schools within the borough

- Media outlets such as the Merthyr Express

We may also be required to share photographs or recordings captured with the Police Force to assist them with investigations if an issue were to arise during an event or activity.

There may also be occasions when we must share this personal data with the Welsh Government or Eystyn during an inspection.

We may also commission external organisations to process personal data on our behalf. These organisations are known as the school's data processors and assist us to capture the personal data used for the services detailed in this notice. They include:

- IT providers, such as our communication platforms with parents and our school website providers
- School photographers when this is outsourced to an external provider
- Social media platform
- Publication providers or printers who assist us in the creation, publication, and printing of our school prospectus.

Our data processors will only act on our instructions and unless we inform them otherwise. They are not able to use your personal data in any other way. Our Data Protection Officer can provide further information on how we ensure our data processors act in accordance with the data protection laws.

7. HOW LONG WE KEEP YOUR 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. We will also review our social media posts on an annual basis and will delete any posts that we no longer require.

8. HOW WE KEEP YOUR PERSONAL DATA SECURE

We have implemented appropriate security measures to prevent your personal data from being accidentally lost, used, accessed, altered, or disclosed in an unauthorised way. We limit access to your personal data to those employees who have a business need to know. Our employees will only process your personal data 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 of a suspected breach where we are legally required to do so. Our school works alongside our appointed Data Protection Officer and Merthyr Tydfil County Borough Council's Information Governance Team.

You can find out more about how we keep your personal data secure by contacting the Information Governance Team.

9. YOUR LEGAL RIGHTS

In certain circumstances, you have rights under data protection laws in relation to your personal data, which include:

- The right to Rectification
- The right to Restrict processing
- The right to Object
- The right to Erasure
- The right of Access

If you want to submit a request in respect of the rights listed above, please contact the Data Protection Officer in writing using the contact details provided in section 2 of this notice.

10. FURTHER DETAILS

You have the right to make a complaint at any time if you are unhappy about how the school has used your personal data. where we encourage you to contact us in the first instance you can also complain to the to Information Commissioner's Office, the UK supervisory authority for data protection issues:

Address: Information Commissioner's Office (Wales), 2nd Floor, Churchill House,
Churchill Way, Cardiff, CF10 2HH
Email: wales@ico.org.uk
Tel: 0330 414 6421

If you are looking for more information on how we process your personal data including data security, data retention, individual rights please contact Merthyr Tydfil County Borough Council Information Governance Team on the details provided in Section 2 of this notice. You can also obtain information directly from Information Commissioners Office [website](http://www.ico.org.uk), www.ico.org.uk.