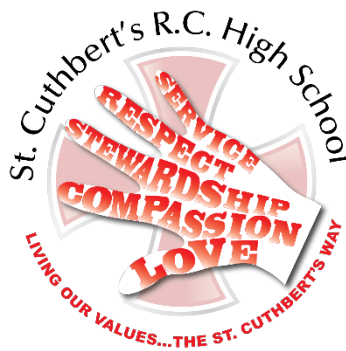




**St. Cuthbert's**  
Roman Catholic High School

# **WHOLE SCHOOL POLICY & PROCEDURES**

## **STAFF PRIVACY NOTICE**



### **Mission Statement**

*'The Lord God requires of us that we should help others whenever we can,  
always make the right choices and be the best that we can be in everything that we do'.*

Policy: Staff Privacy Notice		
Type: Statutory	Website: Yes	Author: A Jackson
Approved: September 20		Next Review: November 22
Frequency: Annual		Delegated: Governors
Notes: Updated the DPO email address and also added a company we share information with.		

# CONTENTS

<b>Who collects your personal information? .....</b>	<b>4</b>
<b>How St. Cuthbert's RC Collect information.....</b>	<b>4</b>
<b>What information do we collect? .....</b>	<b>4</b>
<b>How we use personal information .....</b>	<b>5</b>
<b>What is our legal basis for processing your personal information? .....</b>	<b>6</b>
<b>Where do we store your data? .....</b>	<b>6</b>
<b>How long is your personal information kept for? .....</b>	<b>7</b>
<b>Who do we share your personal information with?.....</b>	<b>7</b>
<b>How you can amend your data .....</b>	<b>8</b>
<b>Your rights and Freedoms under GDPR .....</b>	<b>9</b>

## **Who collects your personal information?**

St. Cuthbert's RC High School  
Shaw Road  
Rochdale  
OL16 4RX

The Primary school which your son/daughter has transferred from will also share admission data with the school.

Rochdale Local Authority  
Number One Riverside  
Smith Street  
Rochdale  
OL16 1XU

## **How do St. Cuthbert's RC High School Collect information?**

We collect your information to provide us the necessary information required to create a contract of employment. Additional information is also required to fulfil our legal obligations with regards to financial arrangements, Health and Safety, Occupational Health when required and Trade Union membership.

We also collect information when you make an enquiry to the school such as your name, address and date of birth, similar information is also recorded via our communication systems and social media. During a phone call we may also record the phone conversation.

## **What information do we collect?**

We collect several different types of personal information,

Processing of the below information is shared as you are employed by Rochdale Local Authority on behalf of the school. This makes the school and the local authority joint controllers and joint processors. The list below is all of the information that is asked for when setting up the contract of employment, some information is shared to the Disclosure Barring Service and other to the school. Certain special category data will not be seen by the school.

This will include but is not limited to,

- First name
- Middle name/s

- Surname
- Date of Birth
- Gender
- Qualifications
- National Insurance Number
- Absences
- Trade Union Membership (for arrangement of payment – not seen by school)
- Car Information
- Addresses
- Telephone numbers
- Email addresses
- Next of kin (including name, address, and contact information)
- Medial information including Dr's name and address
- Ethnic/Cultural information (Ethnicity, Languages Spoken, Asylum Status, National Identity, Country of Birth, Religion, Traveller Status and Date of Entry into the UK)
- Biometric information (for cashless catering) Separate opt in required
- Disability information if required.
- Disciplinary information
- UK residency identification

### **How we use personal information**

Your information is used in several ways in school:

- Identification within the school, roles and responsibilities
- Provide information for a Disclosure Barring Service check (DBS)
- For payment of salaries
- For Health and Safety compliance
- For enrolment on ICT systems including online learning platforms
- For statutory website requirements information can appear on the school website and posters around the school (Names of Safeguarding lead)
- Compliance with Tax Law, Census, Education Act 1992, General Data Protection Regulations and other statutory requirements under UK Law
- Security within the school, for example door access and CCTV
- Training and Qualifications
- Sharing with the local authority

## **What is our legal basis for processing your personal information?**

We will only collect and use your personal information (as described in section 4) in accordance with data protection legislation. Our legal basis for processing your personal information are as follows:

1. **Consent** – When we ask you for your explicit consent to use your information – for example, Biometrics
2. **Contractual** – the processing is necessary for a contract you have with an individual because they have asked you to take specific steps before entering into a contract – for example gaining employment with the school/LA
3. **Legal Obligation** – the processing is necessary to comply with the law. For example, as a school we have legal obligations under the education act to provide an education, part of this task is to ensure that all staff have a DBS check.
4. **Public Task** – the processing is necessary for us to perform a task in the public interest or for our official functions and the task or the function has a clear basis in law – a number of reasons in school come under this for example we have to provide a safe learning environment so we follow Health and Safety regulations.

## **Where do we store your data?**

Almost all the personal data we record is kept on the school premises in our central management system, this is encrypted and only accessible by members of staff who are deemed eligible to have access for their role in school. This is especially prudent where special category data is being processed (Race, Religion, Ethnic information, Politics, Religion, Trade Union Membership (not stored in school), Genetics, Biometrics, Health/Medical and Sexual Orientation).

Some information is provided to 3<sup>rd</sup> parties such as Doodle Learn, Active Teach, MyMaths, Microsoft and Google for the purposes of providing learning platforms and utilities in school. No other information is shared with these platforms.

Groupcall and Wonde are our registration providers alongside Sims and are provided with a limited data set which will enable staff to register students into classes, this is a statutory requirement, all information is kept on a server in school and uses the Microsoft Azure cloud for access outside of the school, this information is fully encrypted during transit and on devices used to access it.

We have a statutory/legal obligation to share information with the Local Authority and the Department of Education, this is using a service called s2s and at all points is encrypted.

The schools Safeguarding and Behaviour teams have data sharing agreements with certain outside agencies such as the Police, Public Health England and the NHS, CAMS, Social Services, UK Immigration Services. This is in the interest of the child in a safeguarding capacity that the information is shared with these agencies under the Data Protection Bill 2018 Schedule 2 Exemptions. This occasionally will contain staff information.

### **How long is your personal information kept for?**

All personal information will be kept for the duration that the Department for Education deems legally acceptable.

The school adheres to the Information and Records Management Society guidelines and a copy of their retention schedule can be found here.

Employment records will be kept a minimum of 6 years from the point you or the school terminates your contract of employment.

Please contact the Data Protection Officer [dpo@scrchs.com](mailto:dpo@scrchs.com) if you wish to know the exact retention period for a specific data set.

### **Who do we share your personal information with?**

Information is shared with:

- Rochdale Local Authority (including special category data)
- Microsoft (Office 365 and email)
- Google (Directory services for ICT Login)
- GMPF (Statutory requirement)
- NHS Health England (Statutory requirement)
- Groupcall Limited (Registration Services)
- Wonde (Registration Services)
- ClassCharts (Online learning platform)
- Pearson Active Teach (Online learning platform)
- Doodle Learn (Online learning platform)
- MyMaths (Online learning platform)

- Maths Watch (Online Learning Platform)
- AQA Education (Exams)
- Capita Education Software Services (Central management system)
- Department for Education (Statutory requirement)
- Parent Pay (Online payment services)
- P&A Food Management (Do not receive data, their employees process payments in school, data does not leave site)
- Disclosure and Barring service (Statutory requirement)
- H Tempest Limited (School photographs)
- HM Revenue and Customs (Statutory requirement)
- Home Office (UK Visa and Immigration Status)
- Pearson (Exams)
- Oxford and Cambridge (Exams)
- Renaissance Learning (Online Learning Platform)
- Results Squared Limited (SMS messaging and parental app)
- PageOne (SMS messaging)
- Room Booking System (Parents evening bookings)
- 4Matrix (Reporting tool)
- The Duke of Edinburgh's Awards – Only staff involved
- We also share to a number of agencies for the purposes of Safeguarding children, this is in line with the Data Protection Bill, Schedule 2 Exemptions.

This list is not exhaustive and may include 3<sup>rd</sup> party data processors when we have passed information onto the Local Authority and the Department for Education. If the information changes then the Privacy Policy will be updated on the school website [www.scrchs.net](http://www.scrchs.net)

### **How you can amend your data**

A majority of the information we collect in school is of a statutory nature and therefore some preferences cannot be changed.

However, items that have required consent such as opt in to biometric registration can be amended.

If you would like to amend your preferences, please contact the Head teacher's Secretary or the Local Authority HR department.



## **Your rights and Freedoms under GDPR**

Under the General Data Protection Regulations, you have a number of rights which are detailed below.

You also have the right to request to see or receive a copy of the information we hold about you by requesting a Subject Access Request, we will need a copy of identification off you and detail describing what information you require. Once we have received this, we will provide the information within a period of 30 days. Please note you can only request information about yourself. If you require other information, please submit a Freedom of Information request.

### **Article 15 – Access**

You have a right to access your own personal data, you can request this by sending an email to [dpo@scrchs.com](mailto:dpo@scrchs.com) we will need a copy of your id so we can prove it is you making the request, the information will be returned within 30 days.

### **Article 16 - Rectification**

You have the right to request that information we hold about you is corrected or information that is missing is added.

### **Article 17 – Erasure**

You have the right to have certain information erased, this right does not apply to the majority of the information we hold about you as we perform a statutory function that acts in the public interest therefore we have a legal obligation to keep the information until the retention period is reached.

Where you do have the right to erasure is if you no longer want to use the Biometric cashless catering system, we will remove your fingerprint and ensure that it is deleted.

To ask for the erasure of select information we hold about you please email our Data Protection office at [dpo@scrchs.com](mailto:dpo@scrchs.com)

### **Article 18 – Restriction**

As we perform a statutory function you do not have the right to request a restriction on the processing of your personal information we hold for legal reasons. This however can be imposed by a court or the ICO in the case of investigation.

The exception to this rule is anything that we have asked for explicit consent to use, for example biometrics.

### **Article 21 – Object**

You do not have the right to object to how your personal information is being used as we are performing a statutory function in providing an education and are in a contract of employment.

The exception to this rule is anything that we have asked for explicit consent to use, for example biometrics.

### **Article 20 – Portability**

You do not have the right to portability as the information on our system are records of employment within this school. The information has to be kept due to statutory regulations.

### **Article 22 – Profiling – Automated Decision Making**

You do have the right to object to profiling, this is creating profiles to place people into categories to determine an outcome, schools use this information to arrange people into groups based on attainment, it may also be used for disciplinary reasons and an example would be Bradford scoring for absence. However, we do not automate this process and human decisions are always made, you have the right to ask that another look is taken with regards to a decision being made when profiling is used but this may not affect the outcome.

### **Changes to our Privacy Notice**

We may change the information within this privacy notice when we would like to share information to a new agency or supplier, or if the statutory information we share changes under UK law. If this happens then we will notify all current members of the school community of this change.

## **Contacting us**

If you need to contact us about Data Protection, want to submit a Subject Access Request or a Freedom of Information request please send an email to [dpo@scrchs.com](mailto:dpo@scrchs.com)

You can also contact the school directly at

St. Cuthbert's RC High School  
Shaw Road  
Rochdale OL16  
4RX 01706  
647761