

# **St Mary's Catholic Primary School**



## **Privacy Notice School Workforce (Employees, Trainees, Consultants and Contractors)**

# St Marys Catholic Primary School

*'Learning together in Faith and Love'*

Under Data Protection Law, individuals have a right to be informed about how the school uses any personal data we hold about them. We comply with this right by providing "privacy notices" (also known as fair processing notice to individuals where we are processing their personal data).

This privacy notice explains, how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our school.

St Mary's Catholic School (the School) is the 'Data controller' for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal data.

We have appointed Grow Partners Ltd as its Data Protection Officer (DPO). The responsible contact is David Coy, [david.coy@london.anglican.org](mailto:david.coy@london.anglican.org), 07903506531.

If this notice, or any of the information linked with it is unclear then please contact either the School or the DPO.

## The personal data we hold

Personal data that we may collect, use, store, and share (when appropriate) about those we employ or otherwise engage to work at our school includes, but is not restricted to:

- Personal Information (such as name, date of birth, national insurance number, next of kin, dependents, marital status)
- Contact details (such as telephone number, email address, postal address, for you and your emergency contacts)
- Protected characteristics (such as trade union membership, nationality, language, ethnic origin, sexual orientation, religion or belief, where this has been provided)
- Relevant medical information (such as physical or mental health conditions, including for any disabilities for which the organisation needs to make any reasonable adjustments to fulfil its duty of care)
- Information about your remuneration (such as salary, annual leave, pension, bank details, payroll records, tax status and benefits information)
- Information about your criminal records
- Recruitment information, (such as copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)
- Qualifications and employment records (such as work history, job titles, working hours, training records and professional memberships)
- Assessments of your performance (such as appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence)
- Outcomes of any disciplinary and/or grievance procedures, including any warnings issued to you and related correspondence
- Details of periods of absence (such as holiday, sickness, family leave, sabbatical, including the reasons for the leave)

**St Mary's Catholic Primary School - Privacy Notice**  
**School Workforce (Employees, Trainees, Consultants and Contractors)**

# St Marys Catholic Primary School

*'Learning together in Faith and Love'*

- Photographs & Video (for internal safeguarding & security purposes, school newsletters, media, and promotional purposes)
- Closed-circuit television (CCTV) footage

Data about your use of the school's information and communications system  
We may also hold personal data about you from third parties, such as information supplied by the appointing body and from the Disclosure & Barring Service, in order to comply with our legal obligations and statutory guidance.

A full breakdown of the information we collect on the school workforce can be found in the record of data processing which can be requested by contacting Louise Donohue/Ann Slavin, [info@st-marys.rbkc.sch.uk](mailto:info@st-marys.rbkc.sch.uk) or telephone: 020 8969 0321.

## Why we collect and use this information

The purpose of collecting and processing includes but is not limited to:

- Running the school in an effective and efficient manner
- Enabling you to be paid and other benefits to be provided
- Facilitating safeguarding as part of our safeguarding obligations towards pupils
- Fulfilling our legal obligations in recruiting individuals to the school workforce
- Supporting effective performance management and appraisal
- Supporting effective management of the school workforce, along with the implementation of school policies and procedures
- Providing feedback to your training centre and awarding body
- Informing our recruitment and retention policies
- Allowing better financial modelling, administration and planning
- Providing references where requested
- Equalities monitoring and reporting
- Responding to any school workforce issues
- Improving the management of workforce data across the sector
- Supporting the work of the School Teachers' Review Body
- Assessing the quality of our services
- Complying with the law regarding data sharing.

## The lawful basis for using this data

These are defined under data protection legislation and for personally identifiable information are: Fulfil a contract with you;

- You have given for one or more specific purposes.
- Processing is necessary to comply with the legal obligations of the controller.
- Processing is necessary to protect the vital interests of the data subject.
- Processing is necessary for tasks in the public interest or exercise of authority vested in the controller (the provision of education).
- Processing is necessary for your legitimate interests or the legitimate interests of a third party.

When we process special category information, which is deemed to be more sensitive, the following lawful basis are used;

- You have has given explicit consent.
- Employment, social security and social protection

**St Mary's Catholic Primary School - Privacy Notice**  
**School Workforce (Employees, Trainees, Consultants and Contractors)**

# St Marys Catholic Primary School

*'Learning together in Faith and Love'*

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

A full breakdown of the information we collect on pupils can be requested by contacting Louise Donohue/Ann Slavin, [info@st-marys.rbkc.sch.uk](mailto:info@st-marys.rbkc.sch.uk) or telephone: 020 8969 0321.

Where we have obtained consent to use personal data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you can withdraw consent if you wish to do so.

## Collecting this information

While the majority of information we collect is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

## How we store this data

We collect, store and process data for each member of the school workforce. The information is contained in a virtual and/or physical file which is kept secure and only used for purposes directly relevant to your employment.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our retention policy, a copy of which can be requested from ([info@st-marys.rbkc.sch.uk](mailto:info@st-marys.rbkc.sch.uk)).

## Transferring Data Internationally

We may send your information to other countries when:

- we or a company we work with store information on computer servers based overseas; or
- we communicate with you when you are overseas.

We conduct due diligence on the companies we share data with and note whether they process data in the UK, EEA (which means the European Union, Liechtenstein, Norway and Iceland) or outside of the EEA.

The UK and countries in the EEA are obliged to adhere to the requirements of the GDPR and have equivalent legislation which confer the same level of protection to your personal data.

For organisations who process data outside the UK and EEA we will assess the circumstances of how this occurs and ensure there is no undue risk.

# **St Marys Catholic Primary School**

*'Learning together in Faith and Love'*

Additionally, we will assess if there are adequate legal provisions in place to transfer data outside of the UK.

## **Who we share information with**

In order for us to legally, effectively and efficiently function we are required to share data with appropriate third parties, including but not limited to:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about headteacher performance and staff dismissals
- The Department for Education- to meet our legal obligations to share certain information.
- Educators and examining bodies-such as ensuring we adhere to examining regulations to guarantee the validity of examinations
- Training centres and awarding bodies-in order to provide information and feedback on your performance.
- Your families and representatives- such as in the event of an emergency
- Financial organisations e.g., Pension Scheme, HMRC
- Ofsted-during the course of a school inspection
- Suppliers and service providers – to enable them to provide the service we have contracted them for such as HR, payroll, IT.
- Central and local government- such as workforce analysis
- Our auditors - to ensure compliance with our legal obligations
- Health authorities (NHS) and Occupational Health and employee support schemes to ensure the wellbeing of our staff body
- Health and social welfare organisations
- Professional advisers and consultants- for us to develop our services and best provide our public service
- Trade Unions and Professional Associations - to enable them to provide the service their members require
- Charities and voluntary organisations
- Police forces, courts, tribunals, Security organisations- to create a secure workplace for all staff
- Professional bodies
- Employment & recruitment agencies and future employers - to support reference requests.

## **Why we share your information**

In order to successfully perform our key functions, we need to share personal data with organisations

# St Marys Catholic Primary School

*'Learning together in Faith and Love'*

For example, we are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments

We share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding / expenditure and the assessment educational attainment. We are required to share information about our school employees with our local authority (LA) and the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

## Data collection requirements

The DfE collects and processes personal data relating to those employed by schools and those governing schools (including Single and Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005. All schools are also required to ensure they keep their governors details up to date under s.538 of the Education Act 1996, and the Academies Financial Handbook.

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

For more information about the department's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

To contact the department: <https://www.gov.uk/contact-dfe>

## Data Protection Rights

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- NOT provide information where it compromises the privacy of others
- Give you a copy of the information in an intelligible form.

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

## **St Marys Catholic Primary School**

*'Learning together in Faith and Love'*

In most cases, we will respond to subject access requests within 1 month, as required under data protection legislation. However, we are able to extend this period by up to 2 months for complex requests or exceptional circumstances.

We reserve the right to verify the requester's identification by asking for Photo ID. If this proves insufficient then further ID may be required.  
to be transmitted electronically to another organisation in certain circumstances.

### **Your other Rights Regarding your Data**

You may:

- Withdraw your consent to processing at any time, this only relates to tasks which the school relies on consent to process the data.
- Ask us to rectify, erase or restrict processing of their personal data, or object to the processing of it in certain circumstances and where sufficient supporting evidence is supplied
- Prevent the use of your personal data for direct marketing
- Challenge processing which has been justified on the basis of public interest, official authority or legitimate interests.
- Request a copy of agreements under which your personal data is transferred outside of the United Kingdom.
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect you)
- Request a cease to any processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Refer a complaint to the ICO
- Ask for your personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances)

If you would like to exercise any of the request listed above, then please contact

- Louise Donohue/Ann Slavin
- Email- [info@st-marys.rbkc.sch.uk](mailto:info@st-marys.rbkc.sch.uk);
- Telephone: 020 8969 0321
- Postal: St Mary's Catholic Primary School East Row; London; W10 5AW

The School will comply with the Data Protection legislation in regard to dealing with all data requests submitted in any format, but individuals are asked to preferably submit their request in written format to assist with comprehension.

# St Marys Catholic Primary School

*'Learning together in Faith and Love'*

## Data Protection Breaches

If you suspect that yours or someone else's data has been subject to unauthorised or unlawful processing, accidental loss, destruction or damage. Then we ask that you please contact Louise Donohue/Ann Slavin ([info@st-marys.rbkc.sch.uk](mailto:info@st-marys.rbkc.sch.uk); telephone: 02089690321 and advise us without undue delay.

## Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact Louise Donohue/Ann Slavin ([info@st-marys.rbkc.sch.uk](mailto:info@st-marys.rbkc.sch.uk); telephone: 02089690321).

Alternatively, you can refer a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact either our data protection team or independent data protection officer:

Data Protection team: Email: [info@st-marys.rbkc.sch.uk](mailto:info@st-marys.rbkc.sch.uk) Phone: 020 8969 0321 Post: St Mary's Catholic Primary School East Row; London; W10 5AW

DPO: David Coy – Email: [david.coy@london.anglican.org](mailto:david.coy@london.anglican.org), phone: 07903 506531, post: ATO DPO, St Mary's Catholic Primary School East Row; London; W10 5AW