



Privacy Notice for the Workforce of Moordown St John's CE Primary School

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') 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, in line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

We, Moordown St John's CE Primary School, are the 'data controller' for the purposes of data protection law. Our Data Protection Officer is Kim Bainton (Contact details shown below in Section 9, How to Contact us).

1.0 The personal data we hold

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

- Contact details
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including 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, including work history, job titles, working hours, training records and professional memberships
- Disclosure and Barring Service clearance information
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence (if a minibus driver or using own car on school business)
- Photographs
- CCTV footage
- Data about your use of the school's information and communications system

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Health, including any medical conditions, and sickness records

2.0 Why we use this data

The purpose of collecting your personal data is to help us run the school, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Support effective appraisal and performance management
- Inform our recruitment and retention policies
- Enable the development of a comprehensive picture of the workforce and how it is deployed
- Allow better financial modelling and planning
- Enable equalities monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body
- To comply with the law regarding data sharing, including sharing data with the local authority, the Department for Education and the NHS.

3.0 Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable) race, ethnicity, religious beliefs, sexual orientation, political opinions, trade union membership, health, including any medical conditions, disability and sickness records.

We will take extra care of this data. The legal reason for us to collect and use this personal information is:

- to perform our statutory duties and it is required by law
- for reasons of public interest.
- to protect your vital interests.

4.0 Collecting this information

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

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

5.0 How we store this data

We create and maintain an employment file for each member of staff. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment with the school.

All personal data is stored in accordance with our Records Retention Schedule/Records Management policy. A copy of this is available from the School Office or may be downloaded from the Data Protection/GDPR section of our website

Once your employment with the school has ended, we will retain and then securely delete/dispose of your personal information in accordance with the above-mentioned records retention/management policy

6.0 Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with:

- The Academy Trust: *such as for monitoring and school improvement purposes.*
- Our local authority – *to meet our legal obligations to share certain information, such as safeguarding concerns*
- The Department for Education – *to meet our legal obligations to share certain information*
- Educators and examining bodies – *such as for assessment administration purposes*
- Suppliers and service providers – *to enable them to provide the services we have contracted them for, such as payroll*
- Financial organisations – *such as for the payment of salaries/repayment of expenses*
- Central and local government – *such as for the assessment or collection of tax owed to HMRC*
- Survey and research organisations – *such as for statistical analysis of the workforce*

- Trade unions and associations – *such as for the payment of subscriptions*
- Health authorities – *for example pre-employment health checks, occupational health referrals*
- Security organisations – *such as for the security of the school/ICT systems and safeguarding of our pupils*
- Professional advisers, bodies and consultants – *such as for professional development purposes*
- Charities and voluntary organisations – *such as to provide support/advice*
- Police forces, courts, tribunals – *such as for the prevention/detection of crime/fraud or as part of an employment tribunal process*
- Employment and recruitment agencies – *such as for recruitment processes eg DBS clearances*
- Your family or representatives – *such as to respond to an emergency situation*
- Emergency services – *such as to respond to an emergency situation*
- NHS Track and Trace Covid 19 – *to report on those in close contact with anyone who has tested positive for Covid-19 within the setting.*

As part of the statutory school inspection process, we are required to share information with our regulators, OfSTED and SIAMS (Statutory Inspection of Anglican and Methodist Schools). Information may also be shared with our auditors. Where possible such data is anonymised before sharing.

Occasionally we may share information with the Health and Safety Executive as part of our legal obligation to report certain accidents/incidents/near misses under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations).

Data sharing with NHS Track and Trace – Covid-19

The law on protecting personally identifiable information, known as the General Data Protection Regulation (GDPR), allows Public Health England to use the personal information collected by NHS Test and Trace Service.

Therefore if required to do so by the NHS Track and Trace Services, Moordown St John's Primary School will provide the contact details of all children and adults that have been in close contact with anyone that has tested positive for Covid-19 within the setting.

This is in accordance with Article 6(1)(e) of the GDPR '*processing is necessary for the performance of a task carried out in the public interest*'.

For more information please see the following government guidance.

<https://www.gov.uk/guidance/nhs-test-and-trace-how-it-works#how-nhs-test-and-trace-service-works>

<https://contact-tracing.phe.gov.uk/help/privacy-notice>

6.1 Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

7.0 Your rights: requesting access to personal data (Subject Access Request)

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
- 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
- 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.

If you would like to make a request, please contact our data protection officer.

7.1 Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our Data Protection Officer.

8.0 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 our Data Protection Lead in the first instance; contact details are shown in Point 9 below.

To make a complaint, please contact our Data Protection Officer, contact details are shown in Point 9 below.

Alternatively, you can make a complaint direct to the Information Commissioner, see Point 10.0

9.0 How to contact us for further information

If you would like further information or have a concern or complaint about how we are using your information, we would ask you to contact us:

Our school-based Data Protection lead is Nicky Armstrong (Admin & Personnel Manager)
Telephone: 01202 527683 ext 202 Email n.armstrong@st-johns.bournemouth.sch.uk
Nicky Armstrong, Moordown St John's CE Primary School, Vicarage Road, Bournemouth BH9 2SA

Our independent Data Protection Officer is Kim Bainton (School Business Manager, Kingsleigh Primary School) Telephone: 01202 528893 Email kim.bainton@kingsleighprimary.co.uk
Kim Bainton, Kingsleigh Primary School, Hadow Road, Bournemouth BH10 5HT

10.0 Information Commissioner

For further information about Information Rights legislation or to make a complaint, please contact the Information Commissioner's Office at www.ico.org.uk or telephone **0303 123 1113** or write to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Concerns can also be reported online at <https://ico.org.uk/concerns/>

This notice is based on the [Department for Education's model privacy notice](#) for the school workforce, amended to reflect the way we use data in this school.