

# St Peter's Community Primary School

## Privacy Notice (How we use school workforce and other adults' information)

St Peter's Primary School is the data controller of information you provide to us and recognises its obligations of handling all such information in line with the Data Protection Act (DPA) and the General Data Protection Regulation (GDPR). This Notice sets out how and why we collect your information and what we do with it. We will update it from time to time as required by evolving laws, guidance and practice, informing you directly as far as is reasonably practicable of any substantial changes that affect your rights.

If you would like to discuss anything in this privacy notice, please contact:

Data Protection Officer: **James England**

Telephone: 0800 0862018

Email: [dpo@dataprotection.education](mailto:dpo@dataprotection.education)

If you would like a copy of any documentation please contact the school office.

## The categories of workforce information that we collect, hold and share include:

- Personal information (such as name, employee or teacher number, national insurance number)
- Special categories of data including characteristics information such as gender, age, ethnic group
- Contract information (such as start dates, hours worked, post, roles and salary information);
- Work absence information (such as number of absences and reasons);
- Qualifications (and, where relevant, subjects taught).
- Personal information related to safeguarding requirements (such as Right to Work in the UK, DBS clearance, Disqualification by Association clearance)
- Where appropriate, information about individual's health or medical circumstances and contact details for their next of kin
- Photographs for identity badges and photos taken as part of the school's general activity for use in school and on the school website
- References given or received by the school about staff, and relevant information provided by previous educational establishments and/or other professionals
- Bank details and other financial information, e.g. staff bank details for payments

## Why we collect and use this information

In order to carry out our ordinary duties to staff, pupils and parents, we need to process a wide range of personal data about individuals (including current, past and prospective pupils, parents, staff, contractors, student teachers and volunteers) as part of our daily operations. Some of this activity we need to carry out in order to fulfil our legal rights, duties or obligations – including those under a contract with staff or parents of pupils.

### A general overview of why we use this data is:

- To enable the development of a comprehensive picture of the workforce and how it is deployed
- To inform the development of recruitment and retention policies
- To enable individuals to be paid
- To meet our obligations in evidencing safer recruitment and safeguarding checks
- To monitor staff performance
- To support staff welfare and monitor staff absence

### More detailed purposes for use are described below:

- for the purposes of staff and volunteer recruitment (and to confirm the identity of workforce members and other visiting adults);
- for the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- to enable relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
- for the purposes of financial transactions and reporting such as the payment of fees, payroll, national insurance, pensions, taxes, etc.;
- to give and receive information and references about past, current and prospective staff , including relating to outstanding fees or payment history;
- to monitor and assist (as appropriate) use of the school's IT and communications systems;
- to make use of photographic images of staff in school publications, on the school website and (where appropriate) on the school's social media channels in accordance with the school's policy on taking, storing and using images;
- for security purposes, including CCTV;
- to carry out or cooperate with any school or external complaints, disciplinary or investigation process; and
- where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

We also are required on occasion to process special category data/criminal record information for specific reasons. These reasons will include:

- to safeguard staff welfare and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of events who need to be made aware of dietary or medical needs;

- in connection with employment of staff, for example DBS checks, welfare, union membership or pension plans;
- as part of any school or external complaints, disciplinary or investigation process that involves such data; or
- for legal and regulatory purposes (for example diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

## The lawful basis on which we process this information

We process this information when there is a legal basis or when explicit consent has been obtained, such as:

- when necessary for compliance with a legal obligation (such as obligation to share school workforce data with HMRC for tax purposes as part of running the payroll; or checking teacher qualifications and processing DBS clearance checks as part of the safeguarding requirements for employment in schools; reporting health and safety incidents)
- when necessary to carry out tasks in the school's or its community's public or legitimate interests (as part of the operation of the school curriculum and education of pupils).  
Safeguarding - this data is processed under the legal obligation of The Education Act 2002. Sections 21 and 175 detail how governing bodies of schools must promote the wellbeing of pupils and take a view to the safeguarding of children at the school.

In addition, we will on occasion need to process special category personal data (concerning health, ethnicity, religion, biometrics or sexual orientation) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required.

Other uses of personal data will be made in accordance with the school's public interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data. We do not share information about our staff or volunteers with anyone without consent unless the law and our policies allow us to do so.

## How do we collect this information?

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

## Storing this information

We follow the DfE Data Protection Toolkit for Schools guidance on the retention of records.

## Who we share this information with

We routinely share this information with:

- Our Local Authority
- The Department for Education (DfE)
- Testbase (assessment resources /optional SATS papers)
- Front Door for Families (Children’s Services)
- School Nurse team and other NHS partners (as relevant to pupil medical needs)
- Parentpay (collecting payments from staff for some activities)
- Capita (SIMS pupil and staff record databases)
- Teachers 2 Parents (texts)
- Unions
- Edukey (Provision Map toolkit)
- Meritec (our CPOMS Child Protection and Safeguarding management system)
- Staff key information for the creation of log-ins for curriculum resources; Phonics Play, 2Simple software, Junior Librarian
- Third-party service providers (where a contract exists) in order to fulfil contractual obligations (such as payroll) or where a service is being used in the operations of the school (such as communication applications).

## Why we share school workforce information

We do not share information about workforce members with anyone without consent unless the law and our policies allow us to do so.

### Local authority

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.

### Department for Education (DfE)

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.

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>

The department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- Conducting research or analysis
- Producing statistics
- Providing information, advice or guidance

The department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on

whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- Who is requesting the data
- The purpose for which it is required
- The level and sensitivity of data requested
- The arrangements in place to securely store and handle the data

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.

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, go to: <https://www.gov.uk/contact-dfe>

## Other information we collect and hold

The categories of other information that we collect, hold and share include:

- Visitor information (such as name, business, car registration, DBS certification, purpose of visit)
- Governors' information (such as name, address, contact information, business interests, financial interests and governance roles in other schools)
- Volunteers' information (such as name, address, contact information, DBS certification)
- Supplier and procurement information (as part of our financial management and accounting)

## Why we collect and use this information

Visitor/volunteer information is collected so that:

- We have a record of who is and has been in the building, for health, safety and operational purposes
- We know whether a visitor can be unaccompanied in areas where children are present
- We have a record of official visits (such as inspections or maintenance)

Governors' information is collected so that:

- We can communicate with Governors on school business;
- There is a public record of Governors and their business interests.

Supplier information is collected so that:

- We can operate our financial management and accounting systems, as part of procurement and confirmation of works, contracts etc and the issuing of payments to suppliers and service providers. It is also an audit requirement to keep records of all accounting processes.

## The lawful basis on which we use this information

- Visitor/volunteer information is processed as a task in the public interest where it relates to school operations and under a legal obligation where it relates to health and safety
- Governor information is processed as a task in the public interest.
- Supplier information is processed as a task in the public interest.

## Collecting this information

- **Visitors/volunteer:** As a visitor/volunteer, the information that you provide to us is voluntary. However, we may restrict access to the school if the information is not provided.
- **Governors:** Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.
- **Suppliers:** As a supplier, you provide your supplier information to us on a voluntary basis, as part of the procurement process.

## Storing this information

We follow the DfE Data Protection Toolkit for Schools guidance on the retention of records.

## Who we share this information with

We routinely share this information with:

- **Visitors/volunteers:** your information will not be shared unless requested by an external agency in the course of a health and safety incident or in the investigation of a crime.
- **Governors:** We will publish the names, terms of office, meeting attendance, business interests, financial interests and governance roles of governors in other schools on the school website as per statutory requirements.
- **Suppliers:** your financial information will not normally be shared unless requested by an auditing body or in the course of an investigation related to fraud, tax or other financial regulatory concerns.

## Requesting access to your personal data

Under data protection legislation, you have the right to request access to information that we hold about you. To make a request for your personal information, contact the school office or the data protection officer whose contact details are on the first page of this notice, and ask for a Subject Access Request form.

You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed
- Claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## Further information

If you would like to discuss anything in this privacy notice, please contact:

School Business Manager: [office@stpeters.brighton-hove.sch.uk](mailto:office@stpeters.brighton-hove.sch.uk) (in the first instance)

OR

Data Protection Officer: **James England**

Telephone: 0800 0862018

Email: [dpo@dataprotection.education](mailto:dpo@dataprotection.education)

**Our Local Authority:** Brighton and Hove Council - <https://www.brighton-hove.gov.uk/>

If you would like a copy of any documentation please contact the school office.