

## Privacy Notice for Trust Members, Directors and Governors

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.

We, Cowley St Laurence CE Primary School, are the 'data controller' for the purposes of data protection law. Our data protection officer is Janette Gaffney, Chief Operating Officer.

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
- Bank account details, 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
- Accident/incident reports
- Copy of driving licence
- 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
- Health, including any medical conditions, and sickness records

### Why we collect and use this information

We use school workforce data to:

- Enable the development of a comprehensive picture of the workforce and how it is deployed
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils

- Support effective performance management
- Develop our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring

### **The lawful basis on which we process this information**

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

- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information where you have given us consent to use it in a certain way.

We process this information following (for more information, please visit the websites specified):

- The Education Act 1996 – <https://www.gov.uk/education/data-collection-and-censuses-for-schools>
- Health and Safety at Work Act - <http://www.hse.gov.uk/legislation/hswa.htm>
- Immigration rules on the right to work in the UK - <https://www.gov.uk/guidance/immigration-rules/immigration-rules-index>
- DBS checking in line with the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and those prescribed in the Police Act 1997 (Criminal Records) regulations  
<https://www.gov.uk/government/organisations/disclosure-and-barring-service>

### **Collecting 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 information to us or if you have a choice in this.

### **Storing this information**

We hold data for 7 years.

### **Who we share this information with**

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:

- Our Local Authority
- Department for Education (DfE)
- Police forces, courts, tribunals
- Government agencies - e.g. Border agency; public health agency
- Leaders within the Trust - to a level where it is applicable to their role

### **Why we share information**

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

## **Department for Education (DfE)**

We share personal data with the 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 with the 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 (including 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).

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, visit <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

The department may share information 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 DfE 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: <https://www.gov.uk/contact-dfe>

### **Requesting access to your personal data**

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.**

### **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.

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:

Janette Gaffney, Chief Operating Officer – Frays Academy Trust

Telephone: 01895 462361

Email: [office@fraysacademytrust.org](mailto:office@fraysacademytrust.org)