



Learning Changes Lives

# GDPR Privacy Notice Adults

Summer 2019



St Martin's School



If you are reading a printed version of this document you should check the school/trust website to ensure that you have the most up-to-date version.

If you would like to discuss anything in the privacy notice, please contact the Academy Business Manager: Michelle Noden  
**Email:** Admin@prioryfields.kent.sch.uk

**Our Data Protection Officer is:** Mike Ashley

**Email:** dataofficer@prioryfields.kent.sch.uk

If you would like a copy of any documentation please contact the Academy Business Manager;

Academy Business Manager  
Priory Fields School  
Astor Avenue  
Dover  
Kent

CT17 0FS



## PRIVACY NOTICE

For

*Whinless Down Academy Trust*



### **How we use information**

This notice explains what personal data (information) we hold about you, how we collect, how we use and how we may share information about you. We are required to give you this information under Data Protection Law.

### **Who are we?**

The Whinless Down Academy Trust collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws. Our Data Protection Officer is Mike Ashley.

### **How we use school workforce information**

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

- Personal information (such as name, address, employee or teacher number, pension information, national insurance number and items related to the Single Central Record)
- 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)
- Assessment and qualifications
- Next of kin details
- Payroll information
- Pension information
- Leaver statistics
- Medical and disability information where disclosed.

## **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
- Inform the development of recruitment and retention policies
- Enable individuals to be paid
- Contact next of kin in emergencies
- Inform trained staff of needs in an emergency
- Ensure that children are safe through use of checks required under Keeping Children Safe in Education (2018)

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

We process this information on the following legal basis:

- Education Act (1996)
- Safeguarding 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 well-being of pupils and take a view to the safeguarding of children in schools.
- Keeping Children Safe in Education (2018)
- The Education Act (2002)
- Section 3 of the Children Act 1999 places a duty on a person with the care of a child to do all that is reasonable in the circumstances for the purposes of safeguarding the child.

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

## **Storing this information**

We hold school workforce data as documented in our Record Retention Policy, which can be requested by contacting the Academy Business Manager.

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

We routinely share this information with

- Schools in the Whinless Down Academy Trust
- Third party service providers (where a contract exists) in order to fulfil contractual obligations (such as payroll) and Schools Personnel Service to provide HR services ensuring the Whinless Down Academy Trust ensures a Duty of Care for the people within the organisation or where a service is being used in the operations of the school (such as parent 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 of Education (DfE)

We share personal data with the Department of Education on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation and links to school funding/expenditure and the assessment of education attainment.

## **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. All state funded schools are required to make a census submissions because it is a statutory return under sections 113 and 114 of the Education Act 2005.

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 release 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 is required
- The level and sensitivity of data requested and
- 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.

## **Other information we collect and hold**

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

- Parents' and carers' information (such as name, address, contact information, relationship to the child, involvement with volunteer groups or parent associations)
- Visitor information (such as name, business, car registration, DBS information, purpose of visit)
- Governors', Trustees' and Members' 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 and DBS information)

## **Why we collect and use this information**

Parents' information is collected so that

- We can communicate with you about your child (in relations to things such as education and attainment, health and well-being, attendance and behaviour)
- Send you important information about the school
- Provide you with access to tools and services we use in schools ( such as communication applications)

Volunteers/Visitor information is collected so that

- We have a record of who is and has been in the building, for health, safety and security 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 and 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

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

- Parental information is processed in the public interest where it is related to their child's education. We may have a legal obligation to process data in certain processing activities and in some circumstances we will rely on consent as the lawful basis.
- Volunteer/Visitor 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.

## Collecting this information

- **Parents;** 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 to do this.
- **Volunteers/Visitors;** as a visitor 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.

## Storing this information

We hold school workforce data as documented in our Record Retention Policy, which can be requested by contacting the school office.

## Who we share this information with

We routinely share this information with;

- **Parents;** we will share your information with members of staff, other agencies that the school has contracted and, where you have agreed, with third-party processors who provide services to the school.
- **Volunteers/Visitors;** 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, business interests, financial interests and governance roles of governors in other schools on the school website.

## 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 Academy Business Manager whose contact details are at the top of this notice.

You also have the right to;

- Object to processing 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 and
- 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 by contacting Michelle Noden at [Admin@priorityfields.kent.sch.uk](mailto:Admin@priorityfields.kent.sch.uk)