



# St Paul's Catholic Primary School

## Privacy Notice (How we use school workforce information)

<p><b>Mission:</b>  <i>Our pupils and all members of our school community encompass, celebrate and live our values by:</i>  <b><i>Journeying together, The St Paul's Way.</i></b></p>
<p><b>Our Vision</b>  <i>An exceptional community where acceptance, compassion and diversity is valued. We will encourage and inspire our children to serve God for the good of all, to excel in their learning and be resilient and caring. Our community will recognise, celebrate and protect God's gift of the world through the provision of a creative, relevant and ambitious curriculum which enables our children to be confident and prepared for modern life.</i></p>
<p><b>Our Values:</b>  <i>Respect, Friendship, Perseverance, Honesty, Caring, Thankfulness and Confidence which are rooted in the Gospels of Jesus Christ and we support and encourage those values which form our modern British Society – Democracy, Rule of Law, Individual liberty, mutual respect and tolerance (value) of those of different faiths and beliefs.</i></p>

Signed (chair):  <i>C Lawler.</i>	Name:  Carol Lawler	Date:  7/11/23
Signed (Head):	Name:	Date:
Ratified by: Governing Body on: 7 <sup>th</sup> November 2023		Next Review: Autumn 2025

The Data Controller is St Paul's Catholic Primary School (The Head Teacher)

The Data Protection Officer is Carole Brown of Integra

# Equality Impact Assessment (EIA)

## Part 1: EIA Screening

<b>Policies, Procedures or Practices</b>		<b>Date</b>	October 2023
<b>EIA CARRIED OUT BY:</b>	Claire Rogers	<b>EIA APPROVED BY:</b>	Maxine Sewell

Groups that may be affected:

Are there any concerns that the policy could have a different impact on any of the following groups? (please tick the relevant boxes)	Existing or potential adverse impact	Existing or potential for positive impact
Age (young people, the elderly: issues surrounding protection and welfare, recruitment, training, pay, promotion)		YES
Disability (physical and mental disability, learning difficulties; issues surrounding access to buildings, curriculum and communication).		YES
Trans Gender		YES
Marriage and civil partnership		YES
Pregnancy and maternity		YES
Racial Groups (consider: language, culture, ethnicity including gypsy/traveller groups and asylum seekers)		YES
Religion or belief (practices of worship, religious or cultural observance, including non-belief)		YES
Gender (male, female)		YES
Sexual orientation (gay, lesbian, bisexual; actual or perceived)		YES

Any adverse impacts are explored in a Full Impact Assessment.

St. Paul's Catholic Primary is the Data Controller for the use of personal data in this privacy notice.

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

- personal information (such as name, employee or teacher number, national insurance number, address, personal contact telephone numbers, emergency contact telephone number (next-of-kin/nominated person) identification verification documents, bank details for payroll, marital status, Disqualification by Association – recorded response)
- recruitment information – application form (including personal statements and covering letters), employment record, references, copies of right to work documentation, identification verification documents, interview documentation (Recruitment information is securely kept for six months for unsuccessful candidates and then securely destroyed)
- special categories of data including characteristics information such as gender, age, religion, 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)
- performance management records
- medical – clearance to work, occupational health records/recommendations/ Fit for Work certificates
- training records
- outcomes of any disciplinary, capability and/or grievance procedures
- photographs
- Information certified by you confirming fitness to transport staff, pupils, parents in your vehicle on school business.

## 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
- enable and ensure staff wellbeing policies and practice
- inform the development of recruitment and retention policies and practice
- enable individuals to be paid
- enable effective performance management to ensure best quality teaching and learning and professional development
- facilitate safer recruitment as part of our safeguarding obligations towards pupils
- allow effective and efficient financial modeling and planning
- enable equality monitoring
- improve the management of workforce data across the sectors, including

## The lawful basis on which we process this information

We process this information under the Education Act 1996 and General Data Protection Regulation including Article 6 'Lawfulness of processing' and Article 9 'Processing of special categories of personal data' <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

## Collecting this information

We collect personal information via the Application Process and Safer Recruitment Documentation and Staff Contact Details Forms.

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 and we will tell you what you need to do if you do not want to share this information with us.

## Storing this information

We hold school workforce data for the time specified in the school's data retention policy.

## Who we share this information with

We routinely share this information with:

- our local authority
- the Department for Education (DfE)
- Catholic Education Service (Summary of collective data only – no individual data shared).
- Clifton Diocese – Department for Schools and Colleges
- IT software packages to support teaching and learning including School Spider.

## 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** – South Gloucestershire Council

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 of educational attainment.

All data is transferred securely and held by DfE under a combination of software and hardware controls which meet the current [government security policy framework](#).

## **Catholic Education Service (CES)**

This is a non-statutory census return of collective data of the workforce. The CES Census is a survey of Catholic schools in England and Wales. It provides essential information on Catholic education from national to diocesan level, underpinning policy decisions at both local and national levels and enabling the CES to be proactive in promoting Catholic education.

## **Clifton Diocese - Department for Schools and Colleges**

This is a non-statutory sharing of data regarding certain staff with R.E. and Worship subject leadership and school leadership and Chair of Governors. This information enables policy decisions at diocesan level and enhances and supports the work of our school in terms of its catholic life and teaching.

## **IT software packages to support teaching and learning**

This is a non-statutory sharing of data involving staff name and school email address to access the support packages/resources to aid their teaching practice.

## **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). 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

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; 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.

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

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the Headteacher.

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; and
- a right to seek redress, either through the ICO, or through the courts

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/>

## Last updated

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated in September 2023.

## Contact

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

## How Government uses your data

The workforce data that we lawfully share with the DfE through data collections:

- informs departmental policy on pay and the monitoring of the effectiveness and diversity of the school workforce
- links to school funding and expenditure
- supports 'longer term' research and monitoring of educational policy

## Data collection requirements

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## Sharing by the Department

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:

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## How to find out what personal information DfE hold about you

Under the terms of the Data Protection Act 2018, you're entitled to ask the Department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

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