



Barnard Grove Primary School Privacy Notice –

WORKING TOGETHER
FOR CHILDREN

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.

Barnard Grove Primary School is the data controller of the personal information that we collect, hold and share about individuals. This means the school determines the purposes for which, and the manner in which, any personal data relating to individuals is to be processed. We are registered as a data controller with the Information Commissioner's office with the following data protection registration number, ZA091286.

1. 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 i.e. contact telephone number(s), email address(es), home address
- 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
- Disclosure and Barring Information
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence
- Photographs
- Images or footage captured on school CCTV system
- Data about your use of the school's information and communications system, for example email and internet usage.

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. Why we use this data

The purpose of processing personal data is to help us manage the running of the school, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils

- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body

3. Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to.

Our lawful basis for collecting and processing personal information about you are defined under Article 6(1) of the GDPR, and the following sub-paragraphs apply:

- a) You have given us consent to use your data for one or more specific purposes,
- b) The processing is necessary to fulfil a contract we have entered into with you,
- c) The processing is necessary to comply with a legal obligation
- d) The processing is necessary to protect your vital interests (or someone else's interests
- e) The processing is necessary for the performance of task(s) in the public interest or exercising of authority vested in Barnard Grove Primary School (i.e. the provision of education).

Our lawful basis for collecting and processing sensitive personal information is defined under Article 9(2) of the GDPR in that some of the information we process is sensitive personal information, and the following sub-paragraphs apply:

- You have given us explicit consent to use your data for one or more specific purposes,
- The processing is necessary for the purposes of carrying out our obligations and exercising specific rights in accordance with employment, social security and social protection law
- The processing is necessary to protect your vital interests (or someone else's interests
- The processing is necessary for the establishment, exercise or defence of legal claims
- The processing is necessary for reasons of substantial public interest
- The processing is necessary for the purposes of preventative or occupational medicine, for assessing your working capacity as an employee, and the provision of health or social care or treatment.
- The processing may be necessary for reasons of public interest in the area of public health

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. A full breakdown of the information we collect on pupils and parents and the lawful basis can be requested from the school office.

4. Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

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. How we store this data

We create and maintain an employment file for each staff member. The information contained in your employment file is kept safe and secure and is only used for purposes directly relevant to your employment. You are able to have access to your file at any time to ensure that all information about you is up to date.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our Disposal of Records Schedule.

Full details of the data retention periods applicable to your data can be found in the Disposal of Record Schedules, a copy of which is accessible by contacting the school office.

6. 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:

- Hartlepool Council (or other local authorities) to meet our legal obligations to share certain information with the local authority such as safeguarding concerns and information about headteacher performance and staff dismissals,
- The Department for Education- to meet our legal obligations to share information linked to performance data.
- Your family or representatives- to carry out our public task in the event of an emergency
- Other staff members- to carry out our public tasks, for example having access to your school email address so that information can be shared effectively
- Ofsted, in order to comply with our public task
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as, payroll or HR support
- Central and local government to complete the legal obligation for things such as the workforce census
- Auditors- coming under a legal obligation - auditors may ask about financial information related to schools.
- To meet our legal obligation in relation to 'freedom of information' requests
- Trade unions and associations- to carry out our public task with regard to key discussions within school linked to disciplinary/capability procedures or for events such as redundancy.
- Security organisations- to keep our school secure and under the lawful basis of public task, we pass on certain staff member information so that they can be contacted if necessary (such as the caretaker).
- Health and social welfare organisations to carry out our public task in line with our attendance management policy with organisations such as occupational health
- Police forces, courts, tribunals- to meet our legal obligations to share certain information with it, such as safeguarding concerns or to carry out our public task in relation to a tribunal.

- Employment and recruitment agencies- to meet the public task of supplying requested references.
- The Trust Board and the Local Academy Committee - to carry out our public task within the school and remain accountable to them for finance and personnel issues.

7. Transferring data internationally

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

8. Requesting access to your personal data and your Data Protection Rights

How to access personal information we hold about you

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 we hold information about you or your child, 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 or your child
- 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

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

To make SAR for your personal information, or the personal information of your child(ren), contact the school office in the first instance. A Subject Access Request form can also be obtained from the school office or via the school website.

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 direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate or incomplete personal data rectified, blocked, restricted, erased or destroyed.
- claim compensation for damages caused by a breach of the Data Protection regulations

9. 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 the school office in the first instance.

You can also contact the school's Data Protection Officer if you have any questions, concerns or would like more information about anything mentioned in this privacy notice.

Data Protection Officer

Chief Operating Officer
Ad Astra Academy Trust
Hub Two, The Innovation Centre
Venture Court
Queens Meadow Business Park
Hartlepool
TS25 5TG

Email: enquiries@adastraacademytrust.com

Alternatively, you can raise a concern or complaint with the Information Commissioner's Office (ICO). The ICO can be contacted on 0303 123 1113, Monday to Friday 9am – 5pm.

You can also report concerns and make complaints to the Information Commissioner online via the following hyperlink <https://ico.org.uk/make-a-complaint/>

13. Where can you find out more information?

If you would like to find out more information about how we collect, use and store your personal data, please visit our website where you can view or download copies of our data protection policies and procedures.