



## **PRIVACY NOTICE / DATGANIAD PREIFATRWYDD**

In accordance with the Data Protection Act 2018 and the General Data Protection Regulation individuals have the 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 and this notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our School or who hire facilities.

<b>School Name:</b>	Penygarn Community Primary School
<b>Contact Details:</b>	Miss Louisa Sellars
<b>Privacy Notice Name:</b>	Penygarn Community Primary School Staff Privacy Notice

### **Data controller:**

**Headteacher:** Miss Louisa Sellars

**School Name:** Penygarn Community Primary School

**School staff include employees, casuals, self-employed, agency staff and volunteers.**

### **1) Have we sourced your personal data, directly from you?**

Data is collected from a variety of sources and these include the following:

**Verbally**

**Electronically**

**Via paper systems**

**3<sup>rd</sup> parties**

**Yourself**

### **2) What information does the School collect about you?**

The School collects and processes a range of information about you.

This includes

- Contact details
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers



- Salary, annual leave, pension and benefits information, EWC registration details
- 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
- CCTV footage

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, sex life, political opinions, trade union membership, biometrics (where used for identification), health, including any medical conditions, and sickness records

### **3) The School may collect this information in a variety of ways:**

- verbally, electronically, via paper systems, 3rd parties

#### **We will store your data:**

Electronically  
Paper Based

### **4) Why does the Council process your personal data?**

The purpose of processing this data is to help us run 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
- For the management of letting of school premises

Our lawful basis for using this data

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

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)
- We have legitimate interests in processing the data – for example, where:
  - You have applied for another position and references are required as part of safer recruitment

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.

#### **5) We can process this category of data because:**

For the processing of personal data to be lawful, an Article 6 condition from the General Data Protection Regulation is required. Mandatory school processing of information is covered by the Article 6 condition – processing is necessary for compliance with a legal obligation to which the controller is subject and is contained within the Education Act 1996 and associated Welsh Government regulations.

Optional processing of personal data is covered by the Article 6 condition – explicit consent. If this is the case, you have the right to withdraw consent. Please contact the school for further information.

Data Protection legislation provides extra protection for certain classes of information called 'special category' personal data, which includes:

- Physical or mental health or condition
- Politics
- Racial or ethnic origin
- Religion or other beliefs of a similar nature



- Sex life
- Sexual orientation
- Biometrics (where used for identification purposes)

#### **5) Who has access to your data?**

Internally with schools departments

Torfaen Council Departments including Pensions, Payroll, Education Finance as part of mutual absence scheme, liability insurance and pay.

Educational establishments

Education Achievement Service (EAS)

Welsh Government Health Services

English Government Health Services

Police Services Ambulance Services

Social Care

Families First

NRS Cashless Catering

The school shares your data with third parties because – it is necessary to fulfil the obligations of the controller and data subject

#### **6) Is the Data transferred out of the EEA?**

No

#### **7) How does the School protect data?**

We have, and are developing further, internal policies to ensure the data it processes is not lost, accidentally destroyed, misused or disclosed. It is stored securely in paper form or if electronically will be password protected.

Furthermore data is not accessed by employees except in the performance of their duties.



Where the school engages third parties to process personal data on its behalf, they do so on the basis of written instructions. These third parties are also under a duty of confidentiality and are obliged to implement appropriate measures to ensure the security of data.

**8) How long does the School keep your data?**

We store your data in line with our School Retention Policy.

**9) Are we making automated decisions/profiling with your data?**

No

**Your rights**

You have a number of rights you can exercise:

- access and obtain a copy of your data on request
- require the Council to change incorrect or incomplete data
- under certain circumstances you can require the Council to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- to know the period of time that the data will be stored for
- the right to data portability
- the right to withdraw your consent at any time
- the right to lodge a complaint with a supervisory authority (Information Commissioners Office)
- the consequences of if you fail to provide data to the Council
- the existence of and automated decision-making, including profiling and the consequences of this for you.

If you would like to exercise any of these rights, please contact the Headteacher in writing who will respond within one calendar month.



## DOCUMENT CONTROL

<b>Title:</b>	<b>TEMPLATE – Privacy Notice</b>		
<b>Document Owner:</b>	<b>Senior Information Risk Owner (SIRO)</b>		
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<b>Current Issue Date:</b>	April 2018	<b>Next Review Date:</b>	April 2019

## REVISION HISTORY

<b>Issue Date</b>	<b>Version / Status</b>	<b>Reason for Change</b>	<b>Changed By:</b>
April 2018	1.0 Live	Form created to achieve GDPR Compliance	Sue Bullock