



ST. AIDAN'S CATHOLIC PRIMARY SCHOOL

Headteacher: Mrs. J. M. Farrimond, B.A. (Hons) N.P.Q.H

Fair Processing Notice - Staff

LEADER / CO-ORDINATORS	Mrs J Farrimond Mrs V Barker
GROUPS INVOLVED IN DISCUSSION	Headteacher Senior Leadership Team All Staff Governing Body

Introduction and Aims

This privacy notice explains how and why St Aidan's Catholic Primary School including each of its operating entities (also referred to as "The School", "we", "our" and "us") uses personal data about our employees, staff, contractors, trainees, officers, consultants, and temporary or agency workers (referred to as "you").

You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances in the future.

This notice does not form part of your contract of employment or any other contract to provide services.

Mission Statement

As stated in our school's Mission Statement, our 3 aims are to-

- ~ Have a sense of responsibility and take an active part in serving our world;
- ~ Have a growing understanding of Gospel Values and gather together in prayer and Worship;
- ~ Have a passion for learning and an enjoyment for discovery.

"Hand in Hand,

In the image of Jesus,

We grow together and celebrate who we are."

The staff of St. Aidan's Catholic Primary School will work to give each child the entitlement of a broad, balanced, differentiated curriculum (irrespective of ability) encouraging in every individual a sense of self-worth and self-esteem. All teaching and learning is underpinned by the school mission statement.

Rationale

"Personal data" is any information that relates to an identifiable natural person. Your name, address, contact details, salary details and CV are all examples of your personal data, if they identify you.

The term "process" means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.

The School is a "controller" of your personal data. This is a legal term – it means that we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws.

You also have responsibilities whenever you process personal data in connection with the performance of your role at the School; these are outlined in the School's Data Protection Policy

What types of personal data do we collect and where do we get it from?

We collect many different types of personal data about you for lots of reasons. We cannot administer our employment or other relationship with you without your personal data. Where we don't need your personal data, we will make this clear, for instance we will explain if any data fields in our application or staff survey processes are optional and can be left blank.

Further details of the personal data we collect, where we get it from and what we do with it are set out in Schedule 1.

You provide us with personal data directly when you apply for a job with us, when you complete our School Application Form or correspond with us and in the course of performing your job. We also create some personal data ourselves and obtain some personal data from other sources. We obtain it from other people and organisations, including some public sources, such as publicly available directories and online resources, your emergency contacts, your use of School provided assets, systems and platforms, your line manager and co-workers, your dependants and beneficiaries, third party benefits providers. You can read more about the sources of personal data in the more detailed information set out in as explained in Schedule 1.

Any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting School Business Manager, Vicky Barker.

What do we do with your personal data and why?

We process your personal data for particular purposes in connection with your employment or engagement with us, and the management and administration of our business.

We are required by law to always have a permitted reason or justification (called a "lawful basis") for processing your personal data. There are six such permitted lawful basis for processing personal data. The table at Schedule 2 sets out the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

Please note that where we have indicated in the table at Schedule 2 that our processing of your personal data is either:

- necessary for us to comply with a legal obligation; or
- necessary for us to take steps, at your request, to potentially enter into an employment contract with you, or to perform it and you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract of employment or engagement with you.

We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports.

The School also has the legal right and a legitimate interest to collect and process personal data relating to those we employ to work at our Schools, or those otherwise contracted to work at our Schools. We process personal data in order to meet the requirements set out in UK employment, School and safeguarding law, including those in relation to the following:

- School Funding Agreement and Articles of Association
- School's legal and statutory framework
- Safeguarding Vulnerable Groups Act 2006
- The guidance "Keeping Children Safe in Education"
- The Childcare (Disqualification) Regulations 2009
- The collection of this information benefits both national and local users by: - improving the management of workforce data across the sector

-enabling development of a comprehensive picture of the workforce and how it is deployed -informing the development of recruitment and retention policies



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- allowing better financial modelling and planning
- enabling ethnicity and disability monitoring
- supporting the work of the School Teachers' Review Body

Special category personal data (including personal data)

We are required by law to treat certain categories of personal data with even more care than usual. These are called sensitive or special categories of personal data and different lawful bases apply to them. The table at Schedule 3 sets out the different purposes for which we process your special category personal data and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

Who do we share your personal data with, and why? Sometimes we

need to disclose your personal data to other people.

From time to time we will ask third parties to carry out certain business functions for us, such as the administration of our payroll and our IT support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to other people, we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them. Examples of these third-party service providers include service providers and/or sub-contractors, such as our outsourced payroll provider, and our IT systems software and maintenance, back up, and server hosting providers.

In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, in particular:

- if we transfer, reorganise or merge any part of our business or the business of a third party, and we disclose or transfer your personal data to the prospective third party involved in a business transfer, reorganisation or merger arrangement (and their advisors); and
- if we need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, students, or others.

We have set out below a list of the categories of recipients with whom we are likely to share your personal data:

- employment-related benefits providers and other third parties in connection with your benefits (such as pension administrators).
- consultants and professional advisors including legal advisors and accountants.
- courts, court-appointed persons/entities, receivers and liquidators.
- business partners and joint ventures.
- trade associations and professional bodies.
- insurers.
- the Local Authority.
- NHS (for the purposes of Test, Track and Trace).
- governmental departments, statutory and regulatory bodies including the Department for Education, the Education and Skills Funding Agency, the Department for Work & Pensions, Information Commissioner's Office, the police and Her Majesty's Revenue and Customs.

We may also share your personal data with third parties, as directed by you.

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 DfE including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-Schools>.

The DfE 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 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; 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 DfE'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>

Where in the world is your personal data transferred to?

If any of our processing activities require your personal data to be transferred outside the European Economic Area, we will only make that transfer if:

- the country to which the personal data is to be transferred ensures an adequate level of protection for personal data.
- we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient.
- the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
- you explicitly consent to the transfer.

How do we keep your personal data secure?

We will take specific steps (as required by applicable data protection laws) to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage. For more information, please read our Data Protection Policy.

How long do we keep your personal data for?

If you are our employee, we will keep your personal data during the period of your employment and then, after your employment with us ends, for as long as is necessary in connection with both our and your legal rights and obligations. This may mean that we keep some types of personal data for longer than others.

We will only retain your personal data for a limited period of time. This will depend on a number of factors, including:

- any laws or regulations that we are required to follow.
- whether we are in a legal or other type of dispute with each other or any third party.
- the type of information that we hold about you; and
- whether we are asked by you or a regulatory authority to keep your personal data for a valid reason; and

It is a requirement of our insurance cover to prescribe such a retention period.

Please refer to the School's Records Retention Policy for further details.



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Any personal data contained in any work-related correspondence or records may be retained for longer, dependent on the retention period of the file that your personal data is held on.

What are your rights in relation to your personal data and how can you exercise them?

You have certain legal rights, which are briefly summarised at Schedule 4, in relation to any personal data about you which we hold.

Where our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent, we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent will not impact any of our processing up to that point.

Where our processing of your personal data is necessary for our legitimate interests, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

If you wish to exercise any of your rights please contact Vicky Barker, School Business Manager via v.barker@saintaidans.wigan.sch.uk or 01942 223 544 in the first instance.

You also have the right to lodge a complaint with the Information Commissioner's Office, if you are not satisfied with our response to any enquiries or complaint or believe our processing of your personal data does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO) by:

- writing to: Information Commissioner's Officer, Wycliff House, Water Lane, Wilmslow, Cheshire, SK9 5AF.
- calling: 0303 123 1113; or
- submitting a message through the ICO's website at: <https://ico.org.uk/concerns/>

Updates to this notice

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will update you on material changes to this notice by email. We also encourage you to check this notice on a regular basis.

Where can you find out more?

We have appointed a Data Protection Officer whose role is to inform and advise us about, and to ensure that we remain compliant with, data protection legislation. The Data Protection Officer should be your first point of contact if you have any queries or concerns about your personal data. Our current Data Protection Officer is Matthew Keeffe of RADCaT Ltd who can be contacted via Vicky Barker at v.barker@saintaidans.wigan.sch.uk or 01942 223 544.

This policy was last up-dated on	November 2024
Discussed and agreed with Governors	28th November 2024 (Full Govs)
Formal Review of Policy	November 2027

Signed: _____
Headteacher, Mrs J. M. Farrimond

Chair of Committee

