

Clapham Terrace Primary School

Caring Achieving Respectful Learners

Clapham Terrace, Leamington Spa, CV31 1HZ

Tel: 01926 423404 / 01926 430854

Email: admin2312@welearn365.com

Web: www.claphamterrace.info

Headteacher: Mrs Julie Miles

Privacy Notice (GDPR)

Staff – How we use your information

2023/2024

Under General Data Protection Regulations (GDPR) we are obliged to inform you of the information we hold on you, what we use it for, who we share it with, and for how long we keep it. This privacy notice aims to provide you with this information. If any information is unclear, please contact the school office or the school's Data Protection Officers.

Clapham Terrace Community Primary School and Nursery is the 'data controller'. This means that we are responsible for how your personal information is processed and for what purposes.

The Data Controller (the School) can be contacted in writing to: admin2312@welearn365.com

We process personal data relating to those we employ to work at, or otherwise engage to work at our school. This is for employment purposes to assist in the running of the school and/or to enable individuals to be paid.

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

- personal information (such as name, employee or teacher number and national insurance number)
- 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)
- qualifications and, where relevant, subjects taught

We use staff data to:

- develop a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- enable individuals to be paid and receive other staff benefits
- ensure that we can act in an emergency

Collecting staff information

Whilst the majority of staff information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain staff information to us or if you have a choice in this.

We share staff information with:

- our local authority
- the Department for Education (DfE)
- Local Public Health team
- NHS Test and Trace
- Public Health and other public health agencies
- Information Management Software: SIMS
- Conferencing software: Class Dojo, Microsoft Teams
- HR and Payroll
- School Cloud
- 360 HR
- SAS Staff Absence Insurance

We do not share information about our staff unless the law and our policies allow us to do so.

What do we do with your information?

All personal information is held in a manner which is compliant with Data Protection legislation. Personal information is only processed for the purpose it was collected. The school monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so.

How long do we keep your information for?

In retaining personal information, the school complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the school are required to retain the information.

Transferring data internationally

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

What are your rights with respect of your personal information?

Under data protection law, staff members have the right to request access to information about them that we hold. To make a request for your personal information contact the School Data Protection Officer at Warwickshire Legal Services via email at schooldpo@warwickshire.gov.uk or alternatively;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

****Please ensure you specify which school your request relates to.**

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
- 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, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Review

The content of this Privacy Notice will be on 25th May 2025.

Appendix

What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. Data Protection law sets out the lawful reasons we have to process your personal information and these are as follows:

1) To comply with the law

We collect and use general purpose staff information in order to meet certain legal requirements and legal obligations placed upon the school by UK law. We therefore have the right to process your personal information for such purposes without the need to obtain your consent.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with can be requested from the school office.

2) To protect someone's vital interests

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

3) With the consent of the individual to whom that information 'belongs'

Whilst much of the personal information is processed in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the

4) To perform a public task

It is a day-to-day function of the school to ensure that staff members receive the training and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that staff are properly supported and able to do their job.

5) To comply with a contract we have with you or because you have asked us to take specific steps before entering into a contract

We are able to process personal information in order to comply with the contract that we have with you.

Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

1) Explicit consent of the data subject

2) Necessary for carrying out obligations and exercising specific rights in relation to employment and social security and social protection law

3) Processing relates to personal data which is manifestly made public by the data subject

4) Necessary for establishing, exercising or defending legal claims

5) Necessary for reasons of substantial public interest

6) Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health

7) Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of sensitive category personal information that we process is set out in the tables attached.

Table 1 – Personal information we are required to process to comply with the law

Information Type	Relevant legislation	Special Category- additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Staff information, including personal details, N.I number, DBS checks, qualifications, verification of right to work in the U.K	Education Act 2005, Section 114 and accompanying regulations		Secretary of State, Warwickshire County Council, Disclosure & Barring Service	Legal Obligation
School workforce Census including staff personal details	Education Act 2005, Section 114 and accompanying regulations		Department of Education	Legal Obligation
School workforce Census - Staff Ethnicity	Education Act 2005, Section 114 and accompanying regulations	Consent	Department of Education	Legal Obligation
Accident Records	Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 (RIDDOR)		Health & Safety Executive, and Local Authority Health & Safety team (where necessary)	Legal Obligation
Individual Staff Health & Safety Risk Assessments and Personal Emergency Evacuation Plans (PEEP)	Health and Safety at Work etc Act 1974 and accompanying legislation		Not shared externally	
Qualifying Complaint Information	Education Act 2005, Section 11B		Chief Inspector	Legal Obligation
Verification of Right to work in the U.K (Single Central Record)	Immigration, Asylum and Nationality Act 2006, Section 15		Local Authority, Ofsted	Legal Obligation

Table 2 – Personal information we are required to process as it is necessary to protect someone’s vital interests

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Medical Information	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent OR Necessary for preventative/ occupational medicine	Medical staff i.e. paramedics/ambulance Responsible/First aid trained staff on residential trips	Vital Interest
Staff Dietary Requirements (food allergies)	Necessary for preventative/ occupational medicine	Medical staff i.e. paramedics/ambulance	Vital Interest
Medical Conditions & Staff Emergency Contact Details	Necessary for preventative/ occupational medicine	Medical staff i.e. paramedics/ambulance Responsible/First aid trained staff on residential trips	Vital Interest
Religious belief	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent	Medical staff i.e. paramedics/ambulance	Vital Interest

Table 3 – Personal Information we are required to process with the consent of the individual to whom that information belongs.

Information Type	Special Category – additional lawful reason	Third Parties with whom we share information	Lawful reason for sharing
Photographs		Government agencies eg: Department of Education Local Press/Media, Staff Medical Noticeboard, Parents & Community (Newsletter, School Website, Twitter, Annual Prospectus, Internal school displays, staff photo board). Twitter, School website School Photographer School Prospectus	Consent
Staff Email address and mobile number		Teachers 2 Parents School Cloud Microsoft Teams Other members of staff	Consent

Table 4 – Personal information we are required to process because it is necessary to do so in order to perform a public task

Information Type	Special Category – additional lawful reason	Third Parties with whom we share information	Lawful reason for sharing
Staff Information i.e name, age, address, Emergency contact details		Department of Education – school census.	Legal obligation
Attendance Records of staff meetings and training		Not shared externally	Public Task
Staff personal characteristics ie: Religion/Gender/Ethnicity	Consent	Local Authority – Confidential Recruitment Monitoring and School Annual Census	Public Task & Statistical Purposes
Learning Journals Staff Observations		OFSTED Parents Health bodies such as Speech and Language CAMHS EIS	Public Task & Legal Obligation
Medical Conditions (including allergies)	Necessary for preventative or occupational medicine	Medical Staff ie: Paramedics/ambulance	Vital Interest
Safeguarding information Medical Special Education Needs		Local Authority Health bodies	Legal Obligation
Name		Public Health NHS Test and Trace	Public Task
Date of Birth		Public Health NHS Test and Trace	Public Task
Results of COVID 19 testing	Necessary for reasons of public health	Public Health NHS Test and Trace	Public Task

For visitors			
Name		Public Health NHS Test and Trace	Public Task
Contact details		Public Health NHS Test and Trace	Public Task

Table 5 - Personal information we are required to process because of a contract we have with you or because you have asked us to take specific steps before entering into a contract

Information Type	Third Parties with whom we share the information	Lawful reason for sharing
Recruitment Information - Application forms, interview notes, Medical questionnaires & references	WCC Team Prevent, Local Authority & Ofsted	Public Task / Legal Obligation
Absence Records (including number of absences, reasons for absence & self-certifications forms)	Local Authority - HR & Payroll Team Staff Insurance Provider 360 HR	Public Task
Disciplinary action taken	Local Authority - HR advisory team where relevant 360 HR	Public Task
Grievances	Local Authority - HR advisory team where relevant	Public Task
Staff Information i.e name D.O.B, address, contact details, Emergency contact details	Department of Education - school workforce census.	Legal Obligation
P45 Forms	Local Authority - HR & Payroll team	Public Task
Consent Forms i.e GDPR, Policy Agreement	Not shared externally	
Staff personal bank details	Local Authority requirement for Payroll System	Contract
Appraisal Records, appraisal notes, feedback from colleagues, objectives, updated job descriptions, pay & promotion recommendations	Not shared externally	
Staff information, including personal details, N.I number, DBS, Address, Phone number.	Secretary of State, Warwickshire County Council, Disclosure & Barring Service,	Legal Obligation

