

## **Thomas Jones Privacy Notice**

### **Staff and Governors**

#### **Introduction**

Thomas Jones school collects and uses personal data under the Data Protection Act, 1998, the Education Act, 1996, and in line with the General Data Protection Regulations (GDPR), 2018. This Privacy Notice provides you with details of how we collect and process your personal data in line with this legislation.

As a data controller we are responsible for ensuring the security of all personal data processed.

We have appointed a Data Protection Officer (DPO) who is in charge of privacy related matters at the school. If you have any questions about this privacy notice or the processing of your personal data please contact the Data Protection Officer or Deputy:

**Data Protection Officer: Emma Jones**

**Deputy Data Officer: Janice Hall**

#### **Individual Rights**

The General Data Protection Regulations (GDPR) set out certain rights of the individual in relation to personal data. These include the right to:

- Be informed
- Have access
- Rectify their data (make changes to personal data)
- Erasure of their data (if not required by lawful basis to perform a task in the public interest)
- Restrict processing
- Data portability (the right to obtain and reuse personal data for their own purposes)
- Object to data processing
- Not be subject to automated decision making including profiling.

Please contact the DPO if you wish to exercise any of these rights.

#### **Personal Data We Collect and Process**

Personal data means any information capable of identifying an individual. Categories of personal data that we collect and process include:

- **Identity and Contact Data** (such as name, marital status, date of birth, gender, contact details, National Insurance number)
- **Characteristic Data** (such as ethnicity, language)
- **Employment Data** (such as contracts, roles and remuneration details)
- **Safeguarding Data** (such as criminal record data)
- **Special Educational Needs and Disabilities (SEND) Data**
- **Medical and Administration Data** (such as doctors information, health issues)
- **Attendance Data** (such as absence information)
- **Profile Data** (may include your username and password, feedback and survey responses)
- **Assessment Data** (including appraisal data and lesson observations)
- **Behaviour Information** (such as any disciplinary action)
- **Evaluation Data** (such as feedback on aspects of the school)
- **Photo/Video Data**

This list is not exhaustive, to access the current list of categories of information we process please see our Data Protection and Freedom of Information Policy, Appendix 1, Data Audit, available on the school website.

#### **Reasons for Collecting and Processing Personal Data**

At Thomas Jones we collect and use your personal data for the following purposes:

- For employment contract and to manage pay
- To enable a comprehensive picture of the workforce and how it is deployed
- To provide pastoral care
- To assess the quality of our services
- To keep children safe

- To meet our statutory duties placed upon us by the Department for Education

### Lawful Basis for Processing Data

Under the GDPR, we rely upon lawful bases to process the above information. See table below for details.

<b>Type of Data</b>	<b>Purpose/ Processing Activity</b>	<b>Lawful Basis for Processing</b>	<b>Who processes data?</b>	<b>Storage</b>
- Identity and Contact Data - Characteristic Data	- Employment Contract - Manage Pay	- Contract	- Business Manager - Senior School Administrator	- School's information management system - Paper files kept in locked cupboards
- Characteristic Data - Employment Data	- To enable a comprehensive picture of the workforce and how it is deployed	- Public Task	- Business Manager - Senior School Administrator - DPO	- School's information management system - Paper files kept in locked cupboards
- Identity and Contact Data - Characteristic Data - Medical and Administration Data - Attendance Data - Behaviour Information	- Providing pastoral care	- Public Task - Vital Interests	- Business Manager - Senior School Administrator - DPO - Leadership Team	- School's information management system - School's secure network - Paper files kept in locked cupboards
- Identity and Contact Data - Characteristic Data - Safeguarding Data - Medical and Administration Data - Behaviour Information - CCTV	- Keeping children safe	- Legal Obligation - Vital Interests - Public Task - Special Category Data (processing is necessary to protect the vital interests of the data subject or for the provision of health and social care)	- Senior School Administrator - Business manager - Safeguarding lead - DPO	- Single Central Record - Paper files kept in locked filing cabinets. - CCTV recordings held on the CCTV master system

<ul style="list-style-type: none"> <li>- Identity and Contact Data</li> <li>- Characteristic Data</li> <li>- Employment Data</li> <li>- Safeguarding Data</li> <li>- SEND Data</li> <li>- Medical and Administration Data</li> <li>- Attendance Data</li> <li>- Behaviour Information</li> <li>- Evaluation Data</li> </ul>	<ul style="list-style-type: none"> <li>- Meeting statutory duties</li> </ul>	<ul style="list-style-type: none"> <li>- Public Task</li> <li>- Special Category Data (processing is necessary to protect the vital interests of the data subject and for statistical purposes)</li> </ul>	<ul style="list-style-type: none"> <li>- Administrative staff</li> <li>- SEND coordinator</li> <li>- DPO</li> <li>- Leadership team</li> </ul>	<ul style="list-style-type: none"> <li>- School's information management system</li> <li>- Paper files kept in locked cupboards</li> </ul>
<ul style="list-style-type: none"> <li>- Characteristic Data</li> <li>- Attendance Data</li> <li>- Evaluation Data</li> </ul>	<ul style="list-style-type: none"> <li>- Assessing the quality of our services</li> </ul>	<ul style="list-style-type: none"> <li>- Public Task</li> <li>- Special Category Data (processing is necessary for statistical purposes)</li> </ul>	<ul style="list-style-type: none"> <li>- Leadership team</li> <li>- Administrative staff</li> <li>- DPO</li> </ul>	<ul style="list-style-type: none"> <li>- School's information management system</li> <li>- Paper files kept in locked cupboards</li> </ul>

We may process personal data for more than one lawful basis. If you require further details of personal data being processed and the lawful basis for processing this data please see our Data Protection and Freedom of Information Policy on the school website.

### **Personal Data Collection and Storage**

We collect personal data via staff contract forms. Workforce data is essential for the school's operational use. Whilst the majority of personal information you provide us with is mandatory, some of it is requested on a voluntary basis. In order to comply with the GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this.

At Thomas Jones data is stored electronically on secure systems and paper documents are stored in locked filing cabinets or cupboards within the school offices.

### **Sharing of Personal Data**

We do not share personal information without consent unless the law and our policies allow us to do so. From time to time we are required to share data with the Local Education Authority and the Department for Education to contribute to local and national statistics. This is in line with the Education Regulations, 2007 and amendments. All data is transferred securely and held by the DfE under a combination of software and hardware controls, which meet the current government security policy framework. If you require more information about how the DfE store and use your personal data please visit:

[www.gov.uk/data-protection-how-we-collect-and-share-research-data](http://www.gov.uk/data-protection-how-we-collect-and-share-research-data)

In addition we need to share personal data with third party processors for the purposes set out within this privacy notice, such as PW Payroll Solutions Ltd or Jartech. We only allow processors to process your personal data for specified purposes and in accordance with our instructions and in line with the GDPR. All processors have to provide us with their privacy notice detailing compliance with the GDPR or sign a Data Sharing Agreement with the school. See the Data Protection and Freedom of Information policy for full details of third party processors.

### **Access to Personal Data**

Under the data protection legislation individuals have the right to request access to their personal information that we hold. We ask that all such requests are put in writing. They will then be dealt with as a Subject Access Request. See Data Protection and Freedom of Information Policy for full details.

### **Data Retention**

Personal data will only be retained for as long as necessary to fulfil our processing purposes. In determining appropriate retention periods for personal data we consider the amount, nature and sensitivity of the data, risks of harm from disclosure of data, purposes for which we process data and applicable legal requirements.

### **Rectification and Withdrawal of Personal data**

All individuals must ensure any information they provide is accurate and up to date. Please let us know, if at any time, your personal information changes. A data rectification form will be completed and your data will be updated.

As a maintained school much of the data we process is required by law and cannot be withdrawn however if you do wish any of your personal data to be withdrawn and destroyed, please contact the school office where a data withdrawal form will be completed and we will inform you whether your data can be deleted and securely disposed of.

### **Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, accessed in an unauthorised way, altered or disclosed. Only members of staff that have a duty to process data will have access to this along with third party processors on our behalf. They will only process your personal data on our instructions in line with the GDPR and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Object to Data Processing**

If you are not happy with any aspect of how we collect and use your data, we ask that you raise your concern with us in the first instance so that we can try to resolve any matters for you. If your concerns are not addressed you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

If you would like to discuss anything in this privacy notice please contact the school Data Protection Officer, detailed above.