



1. Privacy notice for parents/carers

Privacy Notice For Parents / Carers of Pupils attending St John's CE Primary School

St John's CE Primary School collects data and information about parents / carers of our pupils so that we can operate effectively as a school. This privacy notice explains how and why we collect parent / carer data, what we do with it and what rights parents have.

The term "parent" is widely defined in education law to include the natural or adoptive parents (regardless of whether parents are or were married, whether a father is named on a birth certificate or has parental responsibility for the pupil, with whom the pupil lives or whether the pupil has contact with that parent), and also includes non-parents who have parental responsibility for the pupil, or with whom the pupil lives. It is therefore possible for a pupil to have several "parents" for the purposes of education law. This privacy notice also covers other members of pupils' families who we may process data about from time to time, including, for example, siblings, aunts and uncles and grandparents.

Privacy Notice (How we use parent / carer information)

St John's CE Primary School is part of the Oxford Diocesan Bucks Schools Trust (ODBST). ODBST are the 'data controller' for the purposes of UK data protection law.

Any queries about this notice should be addressed to either the Headteacher, Ian Newton, the Office Manager, David Bundock, or our Data Protection Officer (DPO), Mrs Rachael Hollinshead. They can be contacted via the school office on 01844 343521 or by email via office@jlg.odbst.org or admin@odbst.org

Why do we collect and use parent / carer information?

We collect and use parent / carer information under the following lawful bases:

- a. where we have the consent of the data subject (Article 6 (a));
- b. where it is necessary for compliance with a legal obligation (Article 6 (c));
- c. where processing is necessary to protect the vital interests of the data subject or another person (Article 6(d));
- d. where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Article 6 (e)).

Where the personal data we collect about parents / carers is sensitive

Approved July 2023

In reviewing this policy the Trust Board has had regards to the Equality Act 2010 and carried out an equality impact assessment. It is satisfied that no group with a protected characteristic will be unfairly disadvantaged

personal data, we will only process it where:

- a. we have explicit consent;
- b. processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent; and / or
- c. processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, where we respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Please see our Data Protection Policy for a definition of sensitive personal data.

We use the parent / carer data to support our functions of running a school, in particular:

- a. to decide who to admit to the school;
- b. to support pupil learning;
- c. to monitor and report on pupil progress;
- d. to provide appropriate pastoral care;
- e. to administer admissions waiting lists
- f. to conduct research
- g. to assess the quality of our services;
- h. to comply with the law regarding data sharing;
- i. for the protection and welfare of pupils and others in the school, including our safeguarding / child protection obligations;
- j. for the safe and orderly running of the school;
- k. to promote the school;
- l. to send you communications that may be of interest to you which may include information about school events or activities, news, campaigns, appeals, other fundraising activities;
- m. in order to respond to investigations from our regulators or to respond to complaints raised by our stakeholders;
- n. in connection with any legal proceedings threatened or commenced against the school.

The categories of parent / carer information that we collect, hold and share include:

- a. Personal information (such as name, address, telephone number and email address);
- b. Information relating to your identity, marital status, employment status, religion, ethnicity, language, medical conditions, nationality, country of birth and free school meal / pupil premium eligibility / entitlement to certain benefits, national insurance numbers, information about court orders in place affecting parenting arrangements for pupils);
- c. Child protection information
- d. Photographs and CCTV images

From time to time and in certain circumstances, we might also process personal data about parents / carers, some of which might be sensitive personal data, information about criminal proceedings / convictions or information about child protection / safeguarding. This information is not routinely

collected about parents / carers and is only likely to be processed by the school in specific circumstances relating to particular pupils, for example, if a child protection issue arises or if a parent / carer is involved in a criminal matter. Where appropriate, such information may be shared with external agencies such as the child protection team at the Local Authority, the Local Authority Designated Officer and / or the Police. Such information will only be processed to the extent that it is lawful to do so and appropriate measures will be taken to keep the data secure.

We collect information about parents / carers before pupils join the school and update it during pupils' time on the roll as and when new information is acquired.

Collecting parent / carer information

Whilst the majority of information about parents / carers provided 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 parent / carer information to us or if you have a choice in this. Where appropriate, we will ask parents / carers for consent to process personal data where there is no other lawful basis for processing it, for example where we wish to request voluntary contributions or share information with the BSA (Parent Teacher Association). Parents / carers may withdraw consent given in these circumstances at any time.

Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your child's personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your child's life or someone else's

life), in situations where you're physically or legally incapable of giving consent

- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

Storing parent / carer data:

A significant amount of personal data is stored electronically, for example, on our database, Arbor. Some information may also be stored in hard copy format. Data stored electronically may be saved on a (cloud) based system which may be hosted in a different country.

Personal data may be transferred to other countries if, for example, we are arranging a school trip to a different country. Appropriate steps will be taken to keep the data secure.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, insurance or reporting requirements. Details of retention periods for different aspects of your personal information are available in our Data Retention Policy which is available from the school office. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

The school has adopted the Information Management Toolkit and Retention Schedule for Schools created by the IRMS (Information and Records Management Society) and adheres to its principles and guidance.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a parent / carer we will retain and securely destroy your personal information in accordance with our data protection policy.

Who do we share parent / carer information with?

We routinely share parent / carer information with:

- Schools that pupils attend after leaving us;
- Our Local Authority, Hertfordshire County Council
- Arbor MIS, text and email communication service and school payment system
- Medical Tracker (accident and medical reporting system) There may be occasions when it is necessary to share parent / carer information other third parties including the following:
 - Early Years Funding Portal
 - Safeguarding and child protection professionals
 - Disclosure and Barring Service
 - CPOMS (Safeguarding reporting system)
 - a new school where a child may be transferring
 - a pupil's home local authority (if different);

- the Department for Education (DfE);
- school governors;
- the Police and law enforcement agencies;
- NHS health professionals including the school nurse, educational psychologists,
- Attendance Improvement Officers;
- Courts, if ordered to do so; • the Teaching Regulation Authority;
- Prevent teams in accordance with the Prevent Duty on schools;
- other schools, for example, if we are negotiating a managed move and we have your consent to share information in these circumstances;
- our legal advisors;
- our insurance providers

Some of the organisations referred to above are joint data controllers. This means we are all responsible to you for how we process your data. In the event that we share personal data about parents / carers with third parties, we will provide the minimum amount of personal data necessary to fulfil the purpose for which we are required to share the data.

Requesting access to your personal data

Under data protection legislation, parents / carers have the right to request access to information about them that we hold (“Subject Access Request”). To make a request for your child’s personal data, or be given access to your child’s educational record, contact the Data Protection Officer via email dpo@bridgewater.herts.sch.uk although any written request for personal data will be treated as a Subject Access Request.

The legal timescales for the School to respond to a Subject Access Request is one calendar month. As the School has limited staff resources outside of term time, we encourage parents / carers to submit Subject Access Requests during term time and to avoid sending a request during periods when the School is closed or is about to close for the holidays where possible. This will assist us in responding to your request as promptly as possible. For further information about how we handle Subject Access Requests, please see our Data Protection Policy.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

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 our data protection responsibilities.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the School Office (email: office@jlg.odbst.org). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data Protection Officer

We have appointed a data protection officer (DPO) to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal information, please contact our DPO, Mrs Rachael Hollinshead via admin@odbst.org.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You can contact the Information Commissioner's Office on 0303 123 1113 or via email <https://ico.org.uk/global/contactus/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any substantial updates.

We may also notify you in other ways from time to time about the processing of your personal information.

Privacy notice on Pupil data for parents

Under data protection law, individuals have a right to be informed about how the trust/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 the Trust, through its schools, collects, stores and uses personal data about **pupils**. This means that we collect and use personal information for specified purposes which this Privacy Notice has been designed to tell you about.

The Trust is the 'data controller' for the purposes of data protection law.

Our data protection officer and contact details are below (see 'Contact us' below).

The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about pupils includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents, including emergency contacts, attainment records and assessment results
- Pupil and curricular records
- Characteristics, such as ethnic background, eligibility for free school meals, or special educational needs
- Exclusion information
- Free school meal and Pupil Premium eligibility
- Details of any medical information and dietary requirements, including physical and mental health
- Reported accidents
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs
- CCTV images captured in school

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education.

What is the purpose of us collecting and using pupil information?

The purposes for which the school collects personal information are as follows:

- To provide appropriate pastoral care
- To support with medical conditions, allergies and SEN
- To manage admissions
- To report and respond to safeguarding concerns
- To support pupil learning
- To provide school meals
- To Monitor and report on your progress and learning
- To ensure that you are safe when attending organised trips, participating in extracurricular activities and events.
- To promote the school and celebrate educational achievement
- Administer admissions waiting lists
- Carry out research
- Comply with the law regarding data sharing

Our legal basis for using this data

We only collect and use pupils' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest

Less commonly, we may also process pupils' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use pupils' personal data, this consent can be withdrawn at any

time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using pupils' personal data overlap, and there may be several grounds which justify our use of this data.

Collecting this information

While the majority of information we collect about pupils is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

How we store this data

We keep personal information about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations.

Please refer to ODBST's Records Management Policy.

Data sharing

We do not share information about pupils with any third party without 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 pupils with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- The Department for Education
- The pupil's family and representatives
- Educators and examining bodies
- Our regulator e.g. Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies

National Pupil Database

The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical

purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies. We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013. To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
 - producing statistics
 - providing information, advice or guidance
- The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases 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 store and handle the data

To be granted access to pupil information, organisations must comply with 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 department's data sharing process, please visit: <https://www.gov.uk/dataprotection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website:

<https://www.gov.uk/government/publications/national-pupildatabase-requests-received>

To contact DfE: <https://www.gov.uk/contact-dfe>

Schools with pupils aged 13 and above

Youth support services

Once our pupils reach the age of 13, we are legally required to pass on certain information about them to [name of local authority or youth support services provider in your area], as it has legal responsibilities regarding the education or training of 13-19 year-olds.

This information enables it to provide youth support services, post-16 education and training services, and careers advisers.

Parents/carers, or pupils once aged 16 or over, can contact our data protection officer to request that we only pass the individual's name, address and date of birth to the relevant local authority or youth support service provider.

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.

Parents and pupils' rights regarding personal data

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

If you make a subject access request, and if we do 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.

If you would like to make a request, please contact our Data Protection Officer.

Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

COVID-19 and Test and Trace

In the event that there is a case of COVID-19 in the school, alongside our protocols for dealing with such an event, there may be the possibility that we will be expected to provide limited contact information about some individuals to the NHS Test and Trace programme. This may include your details, subject to the circumstances at the time. Information will be processed in accordance with data protection legislation and the requirements of the NHS Test and Trace programme.

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **Data Protection Officer**:

ODBST Data Protection Officer
Oxford Diocesan Bucks Schools Trust
The Green
Longwick
Buckinghamshire
HP27 9QY

Email: admin@odbst.org

This notice is based on the [Department for Education's model privacy notice](#) for pupils, amended for parents and to reflect the way we use data in this school.

2. Privacy notice for pupils

You have a legal right to be informed about how our Trust uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data.

This privacy notice explains how we collect, store and use personal data about you.

We, the Trust, are the 'data controller' for the purposes of data protection law. This means that we collect and use personal information for specified purposes which this Privacy Notice has been designed to tell you about.

Our Data Protection Officer is listed below (see 'Contact us' below). The DPO is responsible for dealing with data protection issues within the Trust and you can contact the DPO should you wish to discuss any issues or concerns that you have about data protection.

The personal data we hold

We hold some personal information about you to make sure we can help you learn and look after you at school.

For the same reasons, we get information about you from some other places too – like other schools, the local council and the government.

This information includes:

- Your contact details, including emergency contacts
- Attainment records and assessment results
- Your attendance records
- Your characteristics, like your ethnic background or any special educational needs
- Free school meal and Pupil Premium eligibility
- Any medical information and dietary requirements you have
- Reported accidents
- Details of any behaviour issues or exclusions
- Photographs
- CCTV images

What is the purpose of us collecting and using pupil information

The purposes for which the school collects personal information are as follows:-

- To provide appropriate pastoral care
- To support you with medical conditions, allergies and SEN
- To manage admissions
- To report and respond to safeguarding concerns
- To support your learning
- To provide school meals
- To Monitor and report on your progress and learning
- To ensure that you are safe when attending organised trips, participating in extracurricular activities and events.

- To promote the school and celebrate educational achievement

We use this data to help run the school, including to:

- Get in touch with you and your parents when we need to
 - Check how you're doing in exams and work out whether you or your teachers need any extra help
 - Track how well the school as a whole is performing
 - Look after your wellbeing

Our legal basis for using this data

We will only collect and use your information when the law allows us to. Most often, we will use your information where:

- We need to comply with the law
- We need to use it to carry out a task in the public interest (in order to provide you with an education)

Sometimes, we may also use your personal information where:

- You, or your parents/carers have given us permission to use it in a certain way
- We need to protect your interests (or someone else's interest)

Where we have got permission to use your data, you or your parents/carers may withdraw this at any time. We will make this clear when we ask for permission, and explain how to go about withdrawing consent.

Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.

Collecting this information

While in most cases you, or your parents/carers, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data.

We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't.

How we store this data

We will keep personal information about you while you are a pupil at our school. We may also keep it after you have left the school, where we are required to by law.

Our Records Management Policy sets out how long we must keep information about pupils.

Data sharing

We do not share personal information about you with anyone outside the school without permission from you or your parents/carers, unless the law and our policies allow us to do so.

Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:

- Our local authority – to meet our legal duties to share certain information with it, such as concerns about pupils' safety and exclusions
- The Department for Education (a government department)

- Your family and representatives
- Educators and examining bodies
- Our regulator (the organisation or “watchdog” that supervises us), e.g. Ofsted
- Suppliers and service providers – so that they can provide the services we have contracted them for
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies

National Pupil Database

The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies. We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years’ census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013. To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
 - producing statistics
 - providing information, advice or guidance
- The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases 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 store and handle the data

To be granted access to pupil information, organisations must comply with 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 department’s data sharing process, please visit: <https://www.gov.uk/dataprotection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website:

<https://www.gov.uk/government/publications/national-pupildatabase-requests-received>

To contact DfE: <https://www.gov.uk/contact-dfe>

3. Privacy notice for staff

Under data protection law, individuals have a right to be informed about how the trust/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 the Trust, through our schools, collects, stores and uses personal data about individuals we employ, or otherwise engage, to work at our school.

We, the Trust, are the 'data controller' for the purposes of data protection law. This means that we collect and use personal information for specified purposes which this Privacy Notice has been designed to tell you about.

Our Data Protection Officer is listed below (see 'Contact us' below). The DPO is responsible for dealing with data protection issues within the Trust and you can contact the DPO should you wish to discuss any issues or concerns that you have about data protection.

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
- 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
- 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
- Data about your use of the school's information and communications system

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

Why we use this data

The purpose of processing this data is to help us run the school and Trust, 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

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

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.

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.

How we store this data

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

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

Who do we share your data with and why

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:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- The Department for Education- underpins school funding and educational attainment policy and monitoring. We are required to share information about our pupils with our local authority (LA) and the Department for Education (DfE) under The Education (Information About Individual Pupils) (England) Regulations 2013.
- Your family or representatives
- Educators and examining bodies
- Our regulator e.g. Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll
- Financial organisations
- Central and local government
- Multi-agency partners
- Our auditors
- Survey and research organisations
- Trade unions and associations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies
- Employment and recruitment agencies

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.

Your rights

a. 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 if we do hold information about you, 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
- 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

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our data protection officer.

b. Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

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 us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

COVID-19 and Test and Trace

In the event that there is a case of COVID-19 in the school, alongside our protocols for dealing with such an event, there may be the possibility that we will be expected to provide limited contact information about some individuals to the NHS Test and Trace programme. This may include your details, subject to the circumstances at the time. Information will be processed in accordance with data protection legislation and the requirements of the NHS Test and Trace programme.

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **Data Protection Officer**:

ODBST Data Protection Officer
Oxford Diocesan Bucks Schools Trust
The Green

Longwick
Buckinghamshire
HP27 9QY
Email: admin@odbst.org

This notice is based on the [Department for Education's model privacy notice](#) for the school workforce, amended to reflect the way we use data in this trust.

4. Job Applicant Privacy notice

Introduction The Oxford Diocesan Bucks Schools Trust (ODBST) has a number of obligations under the General Data Protection Regulation (GDPR). This privacy notice sets out the types of data we hold on you as an employee of ODBST and how we use and store that information when you apply to work for us, during the recruitment process and subsequently if you become an employee of ODBST.

Data Controller Details

ODBST is the data controller for all its members schools and its central team. Our postal address is Oxford Diocesan Bucks School Trust, The Green, Longwick, Buckinghamshire, HP27 9QY.

The Data Protection Officer for ODBST can be contacted at: admin@odbst.org.

Data Protection Principles

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way;
- collect your data only for reasons that we find proper for the course of your employment in ways that have been explained to you;
- only use it in the way that we have told you about;
- ensure it is correct and up to date;
- keep your data for only as long as we need it;
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed.

Types of data we process

We process personal data for employment purposes to assist in the running of ODBST.

This personal data includes, but is not restricted to:

- Your name, date of birth, address, telephone number/s and email address, emergency contacts
- Details of qualifications, skills, experience, employment history, other relevant experience, professional memberships and achievements
- Information about your current remuneration level, including benefit entitlements
- Proof of your right to work in the UK
- Whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process

- Equality monitoring information, including information about your gender, ethnic origin, sexual orientation, age, health and religion or belief
- Employment references and the results of any pre-employment screening i.e. DBS checks or fitness to work
- The outcome and results of any interviews or tests which formed part of the recruitment process
- Bank account details, National Insurance number and tax status information
- Copy of driving licence
- Photographs used during a recruitment exercise and for building access passes

We collect data about you in a variety of ways and this will usually start during a recruitment exercise, such as an application form completed by you and interview notes made on behalf of ODBST. In some cases, we may also collect data from third parties such as when taking up references from former employers. Personal data is kept in paper personnel files within Schools or within ODBST's electronic HR and IT systems, depending on the role applied for. This information is kept secure and is only used for purposes directly relevant to your employment.

How ODBST process your data

The purpose of processing this data is to help us run the Trust, including to:

- Make an offer of employment to successful candidates
- Process data in order to enter into an employment contract
- To ensure legal obligations are fulfilled, i.e. checking proof of right to work in the UK before employment commences and seeking information regarding criminal convictions and offences
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Defend any legal claims
- Determine whether we need to make any reasonable adjustments to the recruitment process for candidates who have a disability
- For equality monitoring purposes
- Inform our recruitment and retention policies

The law on data protection allows us to process your data for certain reasons only:

- in order to perform the employment contract that we are party to;
- in order to carry out legally required duties;
- in order for us to carry out our legitimate interests;
- to protect your interests; and
- where something is done in the public interest.

All of the processing carried out by us falls into one of the permitted reasons. Generally, we will rely on the first three reasons set out above to process your data.

By way of example, the personal data that is provided by you, or requested from you, during a recruitment process will enable us to perform the employment contract that we are party to (e.g. pay you), carry out our legally required duties (e.g. ensure you have the right to work in the UK) and carry out our legitimate interests (e.g. ensure that in line with safeguarding procedures the appropriate checks have been made before you commence employment with us). Any data that is collected to adhere to the various safeguarding requirements in schools also has a pupil, and public, interest angle.

When we collect personal information on our forms, we will make it clear whether there is a legal

requirement for you to provide it, and whether there is a legal requirement on the Trust to collect it. If there is no legal requirement then we will explain why we need it and what the consequences are if it is not provided.

How ODBST share your information with third parties

We will not share information about you with third parties without your consent unless the law allows us to.

We are required, by law, to pass on some of the personal data which we collect to:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- The Department for Education
- Police forces
- Professional bodies
- Employment and recruitment agencies

This list is not exhaustive but indicates the key organisations your information may be shared with.

If you require more information about how the Trust, local authority and / or DfE store and use your personal data please visit:

- <https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation>

Other organisations with whom we may share your personal data include:

- The Disclosure and Barring Service for the purposes of carrying out checks on your suitability for work with children;
- Our payroll provider- e.g. national insurance number and bank account details- to enable you to be paid;
- HMRC in conjunction with your legal obligation to pay income tax and make national insurance contributions;
- Our staff absence insurance company
- Our Fitness to Work and our Occupational Health provider
- A child-care voucher provider where you have decided to become part of that scheme so that they can provide the vouchers to you;
- A pension provider, such as Teachers' Pensions or the Local Government Pension Scheme in order to make sure that you pay the correct amount and maintain your entitlement to a pension upon your retirement. To see their privacy policies please visit:
 - <http://www.tpt.org.uk/privacy-policy>
 - <https://www.buckscc.gov.uk/services/council-and-democracy/privacy-policy/>

Our disclosures to third parties are lawful because one of the following reasons applies:

- The disclosure is necessary for the performance of your employment contract;
- The disclosure is necessary for the performance of a legal obligation to which ODBST is subject, for example our legal duty to safeguard pupils;
- The disclosure is necessary to protect the vital interests of others, i.e. to protect pupils from

- harm;
- The disclosure is necessary for the performance of our education function which is a function in the public interest.

We do not share your data with bodies outside of the European Economic Area.

How long we keep your personal information

The information you provide as part of your application will be used in the recruitment process. We will hold your data securely with access restricted to those involved in dealing with your application and in the recruitment process. Once this process is completed the data relating to unsuccessful applicants will be destroyed/deleted after 6 months. If you are the successful candidate, your application form and supporting documents, including references, DBS record and Fitness to Work confirmation, will be retained to form the basis of your personnel record with the Trust.

Your rights

You have a number of rights relating to data we hold about you. These include the right to:

- Ask for access to your personal information;
- Ask for rectification of the information we hold about you;
- Ask for the erasure of information about you;
- Ask for our processing of your personal information to be restricted;
- Data portability (in some cases you can ask the Trust to send you an electronic copy of your data so that it can be given to somebody else);
- Object to us using your information;
- Ask the Trust to stop processing your data for a period of time if data is inaccurate or if you have a dispute about whether or not your interests override the Trust's legitimate grounds for processing data;
- Ask the Trust to explain to you the logic behind any automated decision making, including profiling, based on your data.

More information about your rights is available in our Data Protection Policy, available from the Trust's Data Protection Officer.

Automated decision-making

The Trust's recruitment processes are not based solely on automated decision-making.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if you do not provide the information requested as part of the Trust's requirements, then the Trust may not be able to process your application as we will be unable to process the data needed to do so.

Information Commissioners Contact Information

If at any time you are not happy with how we are processing your personal information then you may raise the issue with the [ODBST Data Protection Officer](#). If you are not happy with the outcome you may raise a complaint with the Information Commissioner's Office:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

COVID-19 and Test and Trace

In the event that there is a case of COVID-19 in the school, alongside our protocols for dealing with such an event, there may be the possibility that we will be expected to provide limited contact information about some individuals to the NHS Test and Trace programme. This may include your details, subject to the circumstances at the time. Information will be processed in accordance with data protection legislation and the requirements of the NHS Test and Trace programme.

Updates to the ODBST Job Applicant Privacy notice

We reserve the right to update this privacy notice at any time, and we will provide candidates with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.