



Privacy Notice for Staff - How we use your information

2018/19

Who are we?

The Romero Catholic Academy is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

The Romero Catholic Academy is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: ZA137894.

You can contact the Academy Trust as the Data Controller in writing at:

The Romero Catholic Academy C/O Cardinal Wiseman Catholic School, Potters Green Road, Coventry CV2 2AJ or office@romero.coventry.sch.uk

What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our staff.

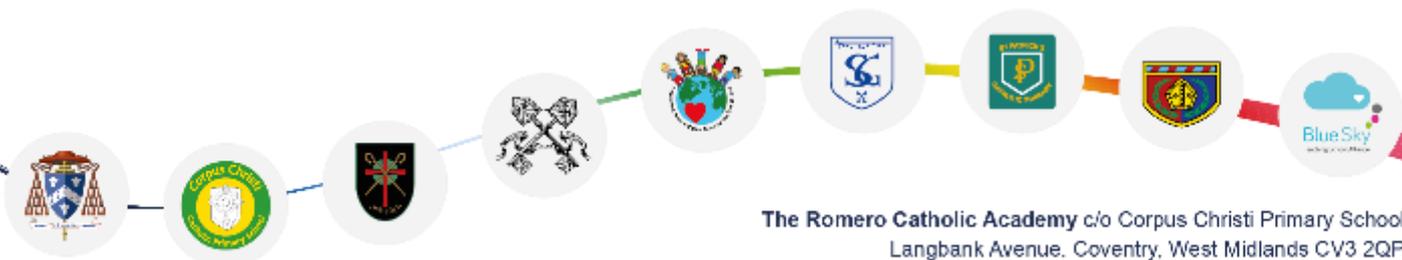
What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

What personal information do we process about staff?

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, religion
 - 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

For what purposes do we use personal information?

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 the development of staff
- 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.

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 Academy Trust 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 is set out in **Table 1**.

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.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in **Table 2**.



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 reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in **Table 3**.

4) To perform a public task

It is a day-to-day function of the Academy Trust 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.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in **Table 4**.

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. Details of the type of processing that we may undertake on this basis and who we may share that information is set out in **Table 5**.

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.

Who might we share your information with?



We routinely share staff information with:

- our local authority
- the Department for Education (DfE)
- 123 Comms Ltd
- Adobe
- Advent Communications Public Relations and Media Services
- Amazon UK Services Ltd
- Apple Inc
- Aspire Teachers
- BHSF Group Ltd
- Billingtons Safety Services
- BioStore Ltd
- BIRCH HR Ltd
- CAPITA
- Cintra
- Companies House
- Coventry City Council
- Create Onsite Limited
- Department for Education
- Derventio Education
- Disclosure and Barring Service
- Doodle
- Dropbox
- Emergency Services
- Evenbrite Inc
- Facebook Inc
- For Schools Education
- GDPRis
- Google
- Governor Hub
- HMRC
- Hays Recruitment
- Image Plus
- Invenry Solutions Ltd
- IRIS Connect Ltd
- Johnson Controls Inc
- Just Teachers
- Lightspeed Systems Inc
- Lloyds Bank PLC
- MacLean Data Comms Ltd
- Microsoft
- Midlands Training Centre
- Monarch Education
- Morris & Simmons Education Ltd
- National Association of Teachers of RE (NATRE)
- National Association for Gallery Education
- National College of Teaching and Leadership
- NS Optimum Ltd
- NSPCC
- NCFE
- NQT Manager
- Primary Goal Ltd
- Primary PPA Cover Ltd
- Sandgate Systems Ltd
- School Business Services Ltd
- Scomis Ltd
- SIMS Cloud
- SkillBase Training Ltd t/a SkillBase First Aid
- Solihull Metropolitan Borough Council
- Sovereign Risk Management Ltd – Schools Advisory Service
- Sophos Ltd
- Stardust Solutions Limited
- Stone King LLP
- Survey Monkey
- Teach First
- Teachers’ Pension Service
- Teaching with heart
- TES Global Ltd
- The Archdiocese of Birmingham – Diocesan Education Service
- The Key Support Services Limited
- The Local Government Pension Services
- Total Reward Group
- TopMark Claims Management Ltd
- Twitter Inc
- University of Warwick

- 
- Virtue Technologies Ltd
 - Warwickshire County Council
 - We Transfer
 - West Midlands Police
 - WhatsApp
 - Wright Hassall LLP
 - Xero (UK) Ltd
 - You Tube LLC

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

Please refer to the tables for information about what personal information is shared with which specific third parties.

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 Academy Trust 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 (as set out above).

How long do we keep your information for?

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

A copy of those schedules can be located using the following link:

<http://irms.org.uk/page/SchoolsToolkit>

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 reviewed 1st December 2019.



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
Full Name	Rehabilitation of Offenders Act 1974			
Date of Birth	Rehabilitation of Offenders Act 1974			
Role Applied For	Rehabilitation of Offenders Act 1974			
Previous Criminal Convictions	Rehabilitation of Offenders Act 1974			



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 including allergies	Necessary to protect vital interest of the data subject or another person where the data subject is physically or legally incapable of giving consent	Emergency Services NHS	Vital Interests
Religious Belief	Necessary to protect vital interest of the data subject or another person where the data subject is physically or legally incapable of giving consent	Emergency Services NHS	Vital Interests



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 the information	Lawful reason for sharing
Ethnic Origin	Data Subject has given explicit consent	CAPITA Scomis Ltd Department for Education	
Religion	Data Subject has given explicit consent	Local Authority The Archdiocese of Birmingham – Diocesan Education Service CAPITA Scomis Ltd	Consent
Medical Information inc long term disabilities	Necessary for the preventative or occupational medicine	CAPITA Scomis Ltd Sovereign Risk Management Ltd – Schools Advisory Service Stone King LLP Birch HR	Consent
Emergency Contact Details		CAPITA Scomis Ltd Emergency Services	Consent
Photograph (inc Videos)		CAPITA Scomis Ltd Inventry Solutions Ltd Local and National media Advent Communications Public Relations and Media Services We Transfer Social Media e.g. Facebook, Twitter, Instagram, You Tube Bio Store	Consent



Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
		IRIS Connect Ltd	

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 the information	Lawful reason for sharing
Name		Third parties listed above	Public Task
Date of Birth		Third parties listed above	Public Task
Gender		Local Authority Department for Education Disclosure and Barring Service The Archdiocese of Birmingham – Diocesan Education Service Total Reward Group	Public Task
Contact details		Local Authority Disclosure and Barring Service CAPITA Scomis Ltd Sovereign Risk Management Ltd – Schools Advisory Service Stone King LLP Birch HR Teaching with Heart Teachers’ Pension Service Local Government Pension Scheme	Public Task
Job Role		Third parties listed above	Public Task
Safeguarding		New employer – upon reference request	Public Task
Disciplinary Details		New employer – upon reference request	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	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
National Insurance Number		Local Authority HMRC Teachers' Pension Service Local Government Pension	Contract
Bank Account Details		Lloyds Bank PLC Xero (UK) Ltd	Contract