



## Privacy Notice Staff

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*Guiden Fawcett*

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## Definitions

In this **Staff Privacy Notice**, unless the context otherwise requires, the following expressions shall have the following meanings:

- i **'The Romero Catholic Academy'** means the Company named at the beginning of this **Staff Privacy Notice** and includes all sites upon which the Company is undertaking, from time to time, being carried out. The Romero Catholic Academy includes; **Corpus Christi, Good Shepherd, Sacred Heart, Blue Sky, SS Peter and Paul, St Gregory, St John Fisher, St Patrick, Cardinal Wiseman, Shared Services Team.**
- ii **'Romero Catholic Academy'** means the Company responsible for the management of the Academy and, for all purposes, means the employer of staff at the Company.
- iii **'Board'** means the board of Directors of the Romero Catholic Academy.
- iv **'Chair'** means the Chair of the Board or the Chair of the Local Academy Committee of the Academy appointed from time to time, as appropriate.
- v **'Clerk'** means the Clerk to the Board or the Clerk to the Local Academy Committee of the Academy appointed from time to time, as appropriate.
- vi **'Catholic Senior Executive Leader'** means the person responsible for performance of all Academies and Staff within the Multi Academy Company and is accountable to the Board of Directors.
- vii **'Diocesan Schools Commission'** means the education service provided by the diocese, which may also be known, or referred to, as the Birmingham Diocesan Education Service.
- viii **'Local Academy Committee'** means the Academy Committee of the School.
- ix **'Academy Committee Representatives'** means the governors appointed and elected to the Local Academy Committee of the School, from time to time.
- x **'Principal'** means the substantive Principal, who is the person with overall responsibility for the day to day management of the school.
- xi **'School'** means the school or college within The Romero Catholic Academy and includes all sites upon which the school undertaking is, from time to time, being carried out.
- xii **'Shared Services Team'** means the staff who work in the central team across the Company (e.g. HR/ Finance)
- xiii **'Vice-Chair'** means the Vice-Chair of the Academy Committee elected from time to time.
- xiv **'School DPO'** means the Data Protection Officer responsible for all schools within The Romero Catholic Academy (Warwickshire Legal Services)

## 1. Introduction

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@romeromac.com](mailto:office@romeromac.com)

## 2. 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.

## 3. 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

#### 4. 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
- to share medical information with Public Health agencies
- to keep the school community safe and well

#### 5. 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.

#### 6. 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.

In certain circumstances, an individual has the right to object to any processing where it is likely to cause or is causing harm or distress. To exercise this right, individuals should do so by contacting The Romero Catholic Academy to inform them of their reasons for the objection. These reasons should relate to your specific circumstances. Upon receipt of an objection, The Romero Catholic Academy will consider the reasons for the objection and balance this against the legitimate grounds to process data.

#### **5) To comply with a contract**

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.

### **7. 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.

### **8. 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).

### **9. NHS Test and Trace/Public Health Agencies**

It may be necessary for us to share limited information with the above agencies in the event that an individual tests positive for Coronavirus, or if there is a Coronavirus outbreak. This will enable the named agencies to liaise with families to provide advice and support, and to take appropriate steps in responding to an outbreak. You have the right to object to the sharing of information with such agencies. This is not an absolute right and will be assessed on a case by case basis.

#### **Testing in schools – Staff and Secondary Pupils only**

To enable lateral flow testing in schools, we need to process personal data of staff and pupils taking part. For information on the data processed in relation to testing in schools, please refer to the privacy information provided by the DfE and published on our website using the below links:

- [COVID19 Lateral Flow Testing Privacy Notice - Primary](#)
- [COVID19 Lateral Flow Testing Privacy Notice - Secondary](#)

## **10. 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 on The Romero Catholic Academy's Records Management Policy [here](#).

## **11. Transferring data internationally**

Where we transfer personal data to a country outside of the UK, we will do so with the appropriate safeguards in place in accordance with data protection law.

## 12. 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
- Amazon UK Services Ltd
- Apple Inc
- Arbor
- 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
- Inventory 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
- NHS/NHS Test and Trace
- NS Optimum Ltd
- NSPCC
- NCFE
- NQT Manager
- Primary Goal Ltd
- Primary PPA Cover Ltd
- Public Health England
- 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 – SAS
- 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.***

### 13. 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](mailto: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.

**In certain circumstances** where the academy processes data for the purposes of legitimate interests or to fulfil their public task, individuals have a right to object to the processing where it is likely to cause, or is causing, harm or distress. When exercising this right, individuals should contact the academy to inform them of their reasons for their objection. The academy will consider the reasons for any objection and assess the risk to the individual against the purposes for the processing. In the event the academy is unable to comply with an objection, we will ensure we can demonstrate compelling legitimate grounds to continue with the processing.

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/>

### 14. Links with other policies

This data protection policy is linked to our:

- Information Security Policy
- Freedom of Information Policy
- CCTV Policy
- Romero Privacy Notices
- Records Management Policy
- Any other individual school policies linked to Information Security and E-Safety

### 15. Monitoring and Review

The Board of Directors delegate the implementation of this privacy notice to the Academy Committee. This policy will be reviewed by CC2 Strategy, People and Organisational Development.

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

<b>Information Type</b>	<b>Relevant legislation</b>	<b>Special Category – additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
Full Name	Rehabilitation of Offenders Act 1974		Disclosure and Barring Service	Statutory Requirement
Date of Birth	Rehabilitation of Offenders Act 1974		Disclosure and Barring Service	Statutory Requirement
Role Applied For	Rehabilitation of Offenders Act 1974		Disclosure and Barring Service	Statutory Requirement
Previous Criminal Convictions	Rehabilitation of Offenders Act 1974		Disclosure and Barring Service	Statutory Requirement

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

<b>Information Type</b>	<b>Special Category - additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
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'

<b>Information Type</b>	<b>Special Category - additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
Ethnic Origin	Data Subject has given explicit consent	CAPITA Scomis Ltd Department for Education	Consent
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 IRIS Connect Ltd	Consent

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

<b>Information Type</b>	<b>Special Category - additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
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
Full name and telephone number	NHS Test and Trace Process for COVID-19	NHS if, and when applicable	Public Task

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

**NHS Test and Trace Process for COVID-19**

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
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
<b>For Visitors</b>			
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	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