CUMRAN PRIMARY SCHOOL

PRIVACY NOTICE

For Those Employed to Teach at a Controlled School

Version	Date Published	Responsible Officer
3.0	April 2024	R Moles P McDade

ABOUT US

Cumran Primary School is a data controller of the personal information you provide to us as an individual employed at the school. This means that the school will determine the purposes for which and the manner in which any personal information relating to its school employees is to be processed.

We are required under the General Data Protection Regulation (GDPR) to notify you of the information contained in this privacy notice.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the GDPR.

It applies to all employees. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practicable.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the GDPR.

If you have any questions about this privacy notice or how we handle personal information, please contact the Principal who will deal with your query. The Principal/Vice-Principal can be contacted by email info@cumran.clough.ni.sch.uk or tel: 028 44811352 or by post Cumran Primary School, The Square, Clough, Downpatrick, BT30 8RB.

Our Data Protection Officer is The Education Authority and it monitors the school's data protection procedures to ensure they meet the standards and requirements of the GDPR. Please contact The Education Authority Data Protection Officer at 028 82411300.

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. The ICO's details are as follows:

The Information Commissioner's Office – Northern Ireland
3rd Floor
14 Cromac Place,
Belfast
BT7 2JB

Telephone: 028 9027 8757 / 0303 123 1114
Email: ni@ico.org.uk

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about employees through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers or background check agencies.

We will collect additional personal information in the course of job-related activities throughout the period of you working with us.

If you fail to provide certain information when requested, we may not be able to comply with our legal obligations (such as to ensure the health and safety of our employees).

WHAT PERSONAL INFORMATION DO WE COLLECT, STORE AND USE ABOUT THOSE EMPLOYED TO TEACH AT CUMRAN PRIMARY SCHOOL.

We will collect, store and use the following categories of personal information about school employees:

- personal information (such as name, employee or teacher number, national insurance number, next of kin details and emergency contact information, photographs, bank account details and tax status information)
- Car registration plates
- special categories of data including characteristics information (such as gender, age, ethnic group, trade union membership, information regarding your health and AccessNI Enhanced Disclosure application and outcome)
- recruitment information (such as copies of references, information included in a CV or letter as part of the application process)
- contract information (such as start dates, hours worked, post, roles and salary information, annual leave, leaving date and your reasons for leaving)
- performance information (including training records and professional memberships)
- disciplinary and grievance information
- work absence information (such as number of absences and reasons, including in respect of parental leave)
- qualifications (and, where relevant, subjects taught)
- CCTV footage captured in school and other information obtained through electronic means (such as swipe card records)
- information about your use of our information and communications systems

WHY DO WE COLLECT AND USE THIS INFORMATION?

Cumran Primary School collects and uses your personal information primarily to allow us to perform our contract with you. For example:

- Making a decision about your recruitment or appointment
- Determining the terms on which you work for us
- checking you are legally entitled to work in the UK
- paying you and, if you are an employee or deemed employee for tax purposes, deducting tax and National Insurance contributions (NICs)
- enrolling you in a pension arrangement in accordance with our statutory automatic enrolment duties
- administering the contract the Education Authority has entered into with you [on our behalf]
- business management and planning, including accounting and auditing
- conducting performance reviews, managing performance and determining performance requirements
- making decisions about salary reviews and compensation
- assessing qualifications for a particular job or task, including decisions about promotions
- gathering evidence for possible grievance or disciplinary hearings
- making decisions about your continued employment or engagement
- making arrangements for the termination of our working relationship
- education, training and development requirements
- dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work
- ascertaining your fitness to work
- managing sickness absence
- complying with health and safety obligations
- to monitor your use of our information and communication systems to ensure compliance with our IT policies
- to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution
- to conduct data analytics studies to review and better understand employee retention and attrition rates
- equal opportunities monitoring

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

We have a legal right to collect and use personal information relating to our staff, for example:

- to enable the development of a comprehensive picture of our workforce and how it is deployed
- to inform the development of recruitment and retention policies
- to enable individuals to be paid
- to administer school property
- to maintain our own accounts and records

- to carry out fundraising
- to support staff training
- to provide appropriate pastoral care
- to assess the quality of our operations
- to comply with the law regarding data sharing

We may also collect and use your personal information in order to meet legal requirements set out in the General Data Protection Regulation and UK law, including:

- Education and Libraries (NI) Order 1986
- Education Reform (NI) Order 1989
- Education and Libraries (NI) Order 1993
- Education (NI) Order 1996
- Education (NI) Order 1997
- Education (NI) Order 1998
- Education and Libraries (NI) Order 2003
- Special Educational Needs and Disability (NI) Order 2005
- Education (NI) Order 2006
- Education Act (NI) 2014

CONSENT

Whilst the majority of the personal information you provide to the school is required for us to comply with our legal obligations, some of that information is provided on a voluntary basis. When collecting data, the school will inform you whether you are required to provide this data or if your consent is needed. Where consent is required, the school will provide you with specific and explicit information with regards to the reasons the data is being collected and how the data will be used.

You have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Principal/Vice-Principal by email at info@cumran.clough.ni.sch.uk or by tel: 028 44811352. 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.

HOW LONG IS YOUR PERSONAL INFORMATION STORED FOR?

Personal information relating to the school workforce at Cumran Primary School is stored in line with the Department of Education Document Retention and Disposal Policy which can be found at https://www.education-ni.gov.uk/publications/disposal-records-schedule.This will give you more information about how long we keep personal information.

In accordance with the General Data Protection Regulations, the school does not store personal information indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

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 an employee at the School we will retain and securely destroy your personal information in accordance with the Department of Education Document Retention and Disposal Policy.

WHO WE SHARE SCHOOL WORKFORCE INFORMATION WITH

We may have to share your personal information with third parties, including third-party service providers and other bodies such as:

- Education Authority
- The Department of Education
- General Teaching Council for Northern Ireland
- Northern Ireland Council for Curriculum Examinations and Assessments
- Education Training Inspectorate
- The Board of Governors
- PSNI
- Information Commissioner's Office

DATA SECURITY

We have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a need to know. They will only process personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator (currently the Information Commissioner's Office) of a suspected breach where we are legally required to do so.

WHY WE SHARE SCHOOL WORKFORCE INFORMATION

We will share your personal information with third parties where required by law or where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

TRANSFERRING INFORMATION OUTSIDE THE EU

We will not transfer the personal information we collect about you to any country outside the EU without telling you in advance that we intend to do so and what steps we have taken to ensure adequate protection for your personal information in those circumstances.

YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

WHAT ARE YOUR RIGHTS?

Under GDPR, members of the school workforce have the right to request access to information about them that we hold. To make a request for your personal information, contact the Principal / Vice-Principal at info@cumran.clough.ni.sch.uk or tel:028 44811352.

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:

- **Request access** to personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. 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 clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.