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# KITWELL PRIMARY SCHOOL

## STAFF PRIVACY NOTICE

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### 1. Introduction

The rules around Data Protection are changing from the 25 May 2018. The 'General Data Protection Regulation' (GDPR) will change how we can use your personal data and keep it safe, and will also strengthen your rights over your own data.

The point of these changes is to ensure sensitive or private information about Employees stays safe and is processed fairly and lawfully. Whilst it is similar to the current Data Protection Act in many ways, there are a few differences, so we need to make a few changes at the school in order to ensure we remain compliant.

Under the GDPR personal data is defined as:

"any information relating to an identified or identifiable natural person ('Data Subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

### 2. The Categories of School Workforce Information that we Collect, Process, Hold and Share include:-

The personal data we collect will be used for the following purposes:-

- Personal information (such as name, employee/teacher number, NI number, address);
- Special categories of data including characteristics information such as gender, age, ethnic group;
- Contract information (such as start dates, hours worked, post, roles and salary information);
- Work absence information (such as number of absences and reasons);
- Request for Leave in term time;
- Qualifications (and, where relevant, subjects taught).

### 3. The Lawful Basis on which we process this information

Our legal basis for processing for the personal data:-

- Performance of a contract, namely a contract of employment.
- Compliance with legal obligations to ensure all appropriate tax and national insurance payments are made.

Any legitimate interests pursued by us, or third parties we use, are as follows:

- To enable us to make appropriate wages/salary deductions on your behalf.

As we are not relying on consent as the legal basis for processing data we do not need to seek your permission to process the data. By issuing this Notice to you we are fulfilling our legal duty to inform you that the processing is taking place.

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Whilst the majority of the information is mandatory, some of it is provided to us on a voluntary basis ie photographs. In order to comply with the GDPR we will inform you when you have a choice to provide this information or not.

#### **4. Rights of a Data Subject**

At any point while we are in possession of, or processing your personal data, you have the following rights: -

- Right of access – you have the right to request a copy of the information that we hold.
- Right of rectification – you have a right to correct data that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have the right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation;
- Right to object – you have the right to object to certain types of processing such as automated processing.
- Right to judicial review: in the event that Kitwell Primary School refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

Please note that Kitwell Primary School will not reveal information in response to Subject Access Requests that might cause harm to the physical or mental health of another individual/employee/governor.

#### **5. Who We Share this Information with**

We are required by law to pass certain information about staff to specified external bodies, such as Birmingham City Council and the Department for Education, so that they are able to meet their statutory obligations.

We also share information with: -

- Pension Schemes (Teacher/Support Staff);
- Occupational Health;
- Inland Revenue.

#### **6. Retention Period**

Kitwell Primary School will process and hold personal data for the duration of your employment at Kitwell Primary School and will store the personal data in line with data protection legal requirements.

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### CCTV

We use CCTV in various locations around the school site to ensure it remains safe. We will adhere to the ICO's [code of practice](#) for the use of CCTV.

We do not need to ask individuals' permission to use CCTV, but we make it clear where individuals are being recorded. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use.

Any enquiries about the CCTV system should be directed to the Data Protection Officer.

### 7. Further Information/Complaints

If you would like further information about this Privacy Notice, please contact [gdpr@kitwellprimary.com](mailto:gdpr@kitwellprimary.com) or 0121 476 0694

In the event that you wish to make a complaint about how your personal data is being processed by Kitwell Primary School, or third parties acting on our behalf, or how your complaint has been handled, you have the right to lodge a complaint directly with the Information Commissioner's Office and Kitwell Primary School's Data Protection Officer.

The details for these contacts are:

	<b>Supervisory Authority contact details</b>	<b>Data Protection Officer Contact Details</b>
Contact Name:	Information Commissioner's Office	Peter Kendrick/Lynne Dixon
Address line 1:	Wycliffe House	Kitwell Primary School
Address line 2:	Water Lane	Wychbury Road
Address line 3:	Wilmslow	Bartley Green
Address line 4:	Cheshire SK9 5AF	Birmingham B32 4DL
Email:	casework@ico.org.uk	gdpr@kitwellprimary.com
Telephone:	0161303 1113 (local rate)	0121 476 0694

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### Document Owner and Approval

The Data Protection Officer is the owner of this document. The Governing Body will approve and review the document as required by the GDPR.

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Signature:

Chair of Governing Body  
Kitwell Primary School

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Date: