



GRANBY

PRIMARY SCHOOL

Privacy Notice Staff and Governors

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Who we are

For the purpose of Data Protection Requirements, the Data Controller is Granby Primary School, Granby Road, Leicester, LE2 8LP. We are registered as a Data Controller with the ICO: Ref Z7767832.

Contacting Us

If you want to request further information about this privacy notice or exercise any of your rights, please contact the school by phone on 0116 229 8160 or by email at info@granby.leicester.sch.uk or our Data Protection Officer on 01757 616885 or info@bls-ltd.co.uk

Our commitment to you

We are committed to protecting and respecting your privacy. We recognise the trust placed in us by individuals whose information we use.

This privacy notice (together with any other documents referred to in it) sets out the basis on how any personal data we collect from you, or that you provide to us, or that we obtain about you will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. We are committed to ensuring that we do so in a manner that is both lawful and respects your privacy.

This notice applies to our staff and Governors.

Your Data Protection Rights

We take the protection of your personal data very seriously and respect your privacy in accordance with data protection legislation and best practice. You have rights relating to your personal information. You can find more information about your privacy rights on the Information Commissioner's Office website www.ico.org.uk.

You have the right to be informed about how and why we process your personal information and any time you give us personal information you have the right to be informed about why we need it and how we'll use it.

You can find most of the information you need in this Privacy Notice.

You have a right of access to your own information

You have a right of access to any of your personal data that we hold about you. You can contact us at any time to gain information about what data we hold about you and why we hold it. Please contact the school or the Data Protection Officer through the above channels for further information about how we comply with this right.

If you make a formal request, we will respond to acknowledge your request and will first require you to prove your identity. We may also ask you for information about any specific information you are seeking to help us make sure we meet your request fully and speed up the process.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

We will provide you the information that you are entitled to as soon as possible and without unreasonable delay and at the latest within one month of your identity being verified by us.

In exceptional cases we may extend the period of compliance by a further two months if the request(s) are complex or numerous. If this is the case, we will inform you within one month of the receipt of the request and explain why the extension is necessary.

There is no charge made for this right of this access.

To make a request for any personal information we may hold we would ask that you contact school or our Data Protection Officer through the above channels.

You have the right to ask us to correct or delete inaccurate personal information

If you believe information we hold about you to be inaccurate or incomplete, you can ask us to correct it or complete it at any time e.g. the spelling of your name or your contact information.

You also have the right to ask for our processing of your personal data to be restricted. For example, if you are contesting the accuracy of data we are using about you. In such cases we will restrict our processing while we verify the accuracy of the data that we hold.

You can also ask for certain information about you to be deleted. For example, if you are moving out of the area.

In certain cases, we will be unable to delete your information if there are statutory grounds to retain it (i.e. HMRC, Safeguarding purposes or other legal requirements).

You have the right to data portability

You have the right to data portability where processing is automated, although we don't currently carry out any such processing. If we do in future, you can make a request and this data can be exported from our systems for you.

What information we collect about you

If you are an employee of Granby Primary School, you may be referred to in a variety of documents and electronic records, including on our staff database.

We collect Governor details from contact forms, amendment forms and email. We may also receive information from the clerk to the governors. We do so to:

- i. Maintain a Governor database.
- ii. Contact Governors regarding administrative arrangements of meetings, statutory changes in legislation and details of training opportunities etc.
- iii. Ascertain local authority Governor vacancies to be filled.
- iv. Assess and report on activities within the school.
- v. Plan future training requirements.

Some of these records are produced by you, such as your employee or Governor application form. Others are produced by us recording information you have provided to us, or the activity you undertake with us.

We may sometimes collect additional information from third parties, including former employers in the form of a reference, or when we need to carry out a Disclosure and Barring Service (DBS) check if your role is a regulated activity.

We have a wide range of employee roles and some roles require more personal information to be processed than others. We are always striving to better understand our employees, to provide you with a better experience with us. To achieve this, we analyse and research information we have on our employees on our database, to group people together in terms of common characteristics. This enables us to better tailor the information we provide to ensure it is relevant and informs our decision making.

We have set out below, in a table format, the ways we collect and use your personal information for certain purposes and how it might sometimes be shared with others:

Information obtained	Purpose	Where stored
Personal contact details, including name, address, telephone, email	To contact employees about their application and if successful their employee role. To maintain our records of our staff. To contact you as a Governor about governance arrangements including where it affects your role and your start and end dates.	Our staff / Governor databases
Emergency contact details	To be able to contact family or a friend in an emergency.	As above
Communication preferences.	To be able to contact employees and Governors with information about the difference we are making together and how else they can get involved.	As above
Date of Birth	To ensure all employees meet our minimum age requirements and to monitor the age demographics of our staff base.	As above
Recruitment records including: details of your skills and qualifications; application form or CV; covering letter; interview notes, copies of proof of right to work in the UK	To help decide about suitability for employee or Governor role and association with Granby Primary School.	As above

Information about any criminal convictions or cautions relating to children and young people	To help decide about suitability for employee or Governor role and association with Granby Primary School.	As above
Two references	To be contacted to confirm applicant's identity and suitability for an employee or Governor role.	As above
Job history summary	To review previous work history as part of our safer recruitment procedures.	As above
Enhanced DBS check	To undertake and assess the risk around any previous criminal history.	DBS check service provider
Information about support needs or any reasonable adjustments necessary and if necessary an individual risk assessment	To understand what extra provision the prospective employee or Governor might need to undertake the role successfully.	Staff / Governor databases
Photo	To create employee/Governor ID card.	Granby
Personal profiling information (gender, ethnicity, disability)	To be aggregated anonymously into statistics about our employees and Governor's demographics for monitoring purposes and reported to funders (Council & DfE).	Staff database
Employee 1:1 supervision / support notes	To review employee performance, experience, safeguarding, learning needs.	As above
The terms and conditions of your employment or engagement (including job title and working hours), as set out in a job offer letter, employment contract, written statement of employment particulars, casual worker agreement, consultancy agreement, pay reviews and bonus letters, statements of changes to employment or engagement terms and related correspondence; any disciplinary, grievance and capability records and related correspondence; training records; records of leave, Trade union membership.	To maintain accurate records during your contracted employment.	As above
Any termination of employment documentation, including resignation letters, dismissal letters, redundancy letters, minutes of meetings, settlement agreements and related correspondence	To fulfil our legal duties regarding your employment / termination of employment and for any subsequent legal claims.	As above
Key financial information including National Insurance number; your bank account details, payroll records, tax code and tax status information	To allow us to pay you in line with our contract of employment with you, including processing tax contributions. As a Governor where it is necessary to process any expense claims etc.	As above

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

On other occasions we may have to process your personal information without your knowledge or consent (for example in compliance with our legal requirements regarding HMRC etc.) where this is required or permitted by law. You will not be informed if this occurs.

Failure to provide information

If you do not provide certain information when requested or required, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations. You may also be unable to exercise your statutory or contractual rights.

Legal basis for using your personal information

Granby Primary School relies on the following legal conditions that are described in the UK General Data Protection Regulation to use your personal information in the ways described in this privacy notice:

- a) Article 6(1)(b) which relates to processing necessary for the performance of a contract.
- b) Article 6(1)(c) so we can comply with our legal obligations as your employer.
- c) Article 6(1)(d) in order to protect your vital interests or those of another person.
- d) Article 6(1)(e) where processing is necessary for the performance of a task carried out in the public interest or in the exercise of the official authority vested in us as a Primary School.
- e) Article 6(1)(f) for the purposes of our legitimate interest or the legitimate interests of a third party.

We need all the types of personal information listed under *"What information we collect about you"* primarily to enable us to perform our contract with you and to enable us to comply with our legal obligations. In some cases, we may also use your personal information where it is necessary to pursue our legitimate interests (or those of a third party), provided that your interests or your fundamental rights and freedoms do not override our interests.

Our legitimate interests include: performing or exercising our obligations or rights under the direct relationship that exists between Granby Primary School and you as its employee, worker or contractor; pursuing our business by employing (and rewarding) employees, workers and contractors; performing effective internal administration and ensuring the smooth running of the school; ensuring the security and effective operation of our systems and network; protecting our confidential information; and conducting due diligence on employees, workers and contractors and facilitating your role as a school Governor.

We believe that you have a reasonable expectation, as our employee, worker, contractor or Governor that we will process your personal information in a proportionate and professional manner.

All maintained school governing bodies (under the Education Act 1996) have a legal duty to provide the governance information as detailed above.

We have a legal obligation under the Education Act 2002 to hold the contact details of Chairs of Governors. We need the details of governors to fulfil our responsibilities to fill these vacancies when they arise under:

- i. Section 13(a) of the Education Act 1996.
- ii. Section 22 and Schedule 6 of the Education Act 2002.
- iii. Section 31(1a&b), (2a) of the School Governance (Constitution) (England) Regulations 2012.

Special category sensitive data

Special Category Data includes information about:

- a) Personal data revealing racial or ethnic origin;
- b) Personal data revealing political opinions;
- c) Personal data revealing religious or philosophical beliefs;
- d) Personal data revealing trade union membership;
- e) Genetic data;
- f) Biometric data (where used for identification purposes);
- g) Data concerning health;
- h) Data concerning a person's sex life.

Where we are required to collect special category data about you (see below) we will use the following lawful bases of the UK GDPR which permits us to process special category data:

- Article 9(2)(h) – processing is necessary for the purposes of preventive or occupational medicine, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3.
- Article 9(2)(b) – processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law.
- Article 9(2)(a) – where you give us explicit consent to process your data.
- Article 9(2)(c) – to protect your vital interests or those of another person where you are incapable of giving your consent.
- Article 9(2)(f) – where the processing is for the purposes of establishing, exercising or defending legal claims or by courts when they are acting in their judicial capacity.
- In addition we rely on processing conditions at Schedule 1 part 1 of the Data Protection Act 2018 including where the processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us as a data controller or you in connection with employment, social security or social protection, and for our statutory purposes, equality of opportunity or treatment, to support volunteers with a particular disability or medical condition, Counselling, for safeguarding of children and individuals at risk, and our insurance provider's conditions.

Communicating with you

Administrative communications

We will communicate with you as required to initially process your employee or Governor application and then, as an active employee or Governor, to provide you with the support and information you need to undertake your role. Where we use photographs to support our publicity you will be made aware, and you will have the opportunity to opt out if necessary. We will do this as we have a legitimate interest in promoting our school.

You will also receive administrative communications from our team that are related to your employee or Governor role such as a welcome email, staff survey and thank you communications.

School publicity communications

We may send you information about our events and activities etc. and how you can get further involved. You will receive additional email and possibly text communications from us and information about how you can further support our work through raising awareness, campaigning or other support. We will try to tailor the information you receive to reflect what we think you will be interested in on the basis of the information we hold about you.

Information we share with third parties

We will share your personal information with third parties where required by law, for example:

- Where we carry out DBS checks;
- Where it is necessary to administer the employee relationship with you;
- Where we have another legitimate interest in doing so;
- Or you have specifically agreed that we may share your personal information with others.

The Department for Education (DfE) collects personal data from educational settings and local authorities. We are required to share information about our Governors with the Department for Education (DfE) under section 538 of the Education Act 1996.

How we keep your information and who has access to it

Your information is held on systems that are maintained and managed securely by Granby Primary School. We ensure that there are technical controls in place to protect your personal details.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

On occasions we may need to disclose your details if required, to the police, regulatory bodies or legal advisors. You may not be informed when this happens.

Wherever possible we store our information about employees in the UK or within the European Union (EU).

[How long we store personal information](#)

We will only use and store personal information for as long as it is required for the purposes it was collected for.

We have a data retention policy (available on request) that sets out the different periods we retain personal information in accordance with our duties under applicable data protection law and various legislative requirements. Some personal information may be retained by us in archives for historical research purposes and we do this in a manner that complies with applicable data protection law.

We continually review what personal information and records we hold and delete what is no longer required.

[Complaints](#)

Granby Primary School strives to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive details of all aspects of the collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the School Business Manager.

If you believe that Granby Primary School has not complied with your data protection rights, you can complain to the Information Commissioner's Office, their address is Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by calling 0303 123 1113.

[Changes to this notice](#)

This privacy notice may be updated from time to time, so you may wish to check it each time you submit information to Granby Primary School. The date of the most recent revisions will appear on this page. We may notify supporters of any major changes by placing a notice on the website or by contacting you directly.

Last update: August 2022

[Employee/Governor acknowledgement](#)

I have read and understood this privacy notice.

Signed.....

Name.....

Date.....