



Privacy Notice Staff

Responsible for policy:	CC2 Strategy, People and Organisational Development
Policy status:	Compliance
Policy review:	Annually
Chair of Directors:	

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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 **Parents and Pupils 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, 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 Governing Body of the Academy appointed from time to time, as appropriate.
- v **'Governance Professional'** means the Governance Professional to the Board or the Governance Professional to the Local Governing Body of the Academy appointed from time to time, as appropriate.
- vi **'Chief Executive Officer or CEO'** 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 Governing Body'** means the Governing Body of the School.
- ix **'Governing Body Representatives'** means the governors appointed and elected to the Local Governing Body 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 Governing Body 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** for the purposes of data protection law. This means we are responsible for deciding how we hold and use personal information about you.

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:

Helen Quinn DPO

The Romero Catholic Academy

C/O Cardinal Wiseman Catholic School

Potters Green Road

Coventry

CV2 2AJ

or admin@romeromac.com

2. What is a Privacy Notice?

A Privacy Notice explains how we collect, use, store and share your personal information, and your rights in relation to that information under UK data protection law.

3. What is Personal Information?

Personal information is any data that can identify you, either directly or indirectly.

Special category data includes more sensitive types of information such as:

- health information
- ethnic origin
- religious beliefs
- trade union membership

We may also process **criminal offence data** where permitted by law.

4. For what purposes do we use personal information?

We collect and hold the following categories of data:

Personal data

- Name, address, contact details
- Date of birth, NI number, employee/teacher number

- Bank details and payroll information
- Right to work documentation

Employment data

- Contract information (role, salary, working hours)
- Absence and leave records
- Performance and appraisal records
- Disciplinary and grievance records

Professional data

- Qualifications
- Training records
- References

Special category data

- Health and medical information
- Equality monitoring data (e.g. ethnicity, religion)
- Trade union membership (where applicable)

Criminal offence data

- DBS checks and safeguarding information

5. Why do we use your personal information

We use your personal data to:

- Fulfil our contractual obligations as your employer
- Pay you and provide benefits
- Support recruitment and workforce planning
- Ensure safeguarding and safe recruitment
- Monitor equality and diversity
- Manage performance and professional development
- Comply with legal and regulatory requirements
- Ensure health and safety
- Respond to emergencies

6. What are our legal bases for processing your data?

We only process your personal data when the law allows us to.

Lawful bases under UK GDPR (Article 6)

We rely on:

- **Legal obligation** – to comply with education, employment and safeguarding law

- **Contract** – to fulfil your employment contract
- **Public task** – to carry out our role as an academy trust
- **Vital interests** – in emergencies
- **Consent** – where required (e.g. photographs)

Special category data (Article 9 + DPA 2018 Schedule 1)

We process sensitive data under the following conditions:

- Employment law obligations
- Safeguarding of children and individuals
- Substantial public interest
- Occupational health
- Legal claims

Purpose	Data	Lawful basis	Special category condition
Payroll	Bank details, NI number	Contract / Legal obligation	N/A
Workforce census	Staff data	Legal obligation	Substantial public interest
Safeguarding checks	DBS data	Legal obligation	Safeguarding
Occupational health	Medical data	Legal obligation	Employment/health

7. Who do we share your information with?

We share data only where necessary, lawful and proportionate.

Key recipients:

- Department for Education (DfE)
- Local authority
- Ofsted
- Disclosure and Barring Service
- HMRC and pension providers
- Occupational health providers
- IT and system providers (e.g. Microsoft, Arbor)

Important information:

- Some organisations act as **data processors** (on our behalf)
- Others are **data controllers** (they decide how data is used)

We ensure appropriate contracts and safeguards are in place.

8. International data transfers

Some of our service providers store data outside the UK.

Where this occurs, we ensure appropriate safeguards are in place, such as:

- UK adequacy regulations
- International Data Transfer Agreement (IDTA)
- Standard contractual clauses

You can request further details from the DPO.

9. How long do we keep your information?

We only retain your data for as long as necessary.

We follow the **Information and Records Management Society (IRMS) Schools Toolkit**, including:

- Staff personnel files: typically **6 years after employment ends**
- Payroll records: **6 years plus current year**
- Safeguarding records: longer where required

Full details are available in our Records Retention Policy.

10. Your rights

Under UK data protection law, you have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request erasure (in certain circumstances)
- Restrict processing
- Object to processing
- Data portability (where applicable)
- Withdraw consent at any time (where used)

To exercise your rights, contact the DPO.

11. Complaints

If you are concerned about how we handle your data, please contact us first.

You also have the right to complain to the ICO:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow

Cheshire
SK9 5AF

Helpline: 0303 123 1113
Website: <https://ico.org.uk>

12. Data security

We have appropriate technical and organisational measures to protect your data, including:

- secure systems and access controls
- staff training
- data protection policies

13. Links with other policies

This notice should be read alongside:

- Data Protection Policy
- Information Security Policy
- Records Management Policy
- Safeguarding Policy

14. Monitoring and Review

The Board of Directors delegate the implementation of this privacy notice to the Local Governing Body.
This notice is reviewed annually by CC2 Strategy, People and Organisational Development.

Third Party List we routinely share staff information with:

- Adobe
- Advent Communications Public Relations
- Amazon UK Services Ltd
- Apple Inc
- Arbor
- Aspire People Ltd
- Aspire Teachers
- Billingtons Safety Services
- Brightminds Recruitment
- CAPITA
- Companies House
- Coventry City Council
- Coventry & Warwickshire Partnership Trust
- Create Onsite Limited
- Dains LLP
- Dataplan Payroll Ltd
- Department for Education
- Disclosure and Barring Service
- Doodle
- Dyslexia Coventry
- Emergency Services
- Eventbrite Inc
- Every
- Everwell Occupational Health
- Facebook Inc
- For Schools Education
- GDPRis
- Google
- Governor Hub
- HMRC
- Hays Recruitment
- Image Plus
- IMP Software Ltd
- Inventory Solutions Ltd
- IRIS Connect Ltd
- Just Teachers
- Kenelm Youth Trust Ltd
- Kiddivouchers
- Lightspeed Systems Inc
- Lloyds Bank PLC
- Lime Recruitment
- Matthew Stokes
- Microsoft
- Midlands Training Centre
- Monarch Education
- National College of Teaching and Leadership
- NS Optimum Ltd
- NSPCC
- NCFE
- Pepper Therapy Ltd
- Primary Goal Ltd
- Public Health England
- Relate Coventry & Warwickshire
- Sandgate Systems Ltd
- School Business Services Ltd
- Skill Base Training Ltd t/a Skill Base First Aid
- Solihull Metropolitan Borough Council
- 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
- TopMark Claims Management Ltd
- Twitter Inc
- University of Warwick
- Virtue Technologies Ltd
- Warwickshire County Council
- Westfield health
- West Midlands Pension Scheme
- West Midlands Police
- WhatsApp
- 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.

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
Staff information, including personal details, N.I number, DBS checks, qualifications, verification of right to work in the U.K	Education Act 2005, Section 114 and accompanying regulations		Secretary of State, Local Authority, Disclosure & Barring Service	Legal Obligation
School workforce Census including staff personal details	Education Act 2005, Section 114 and accompanying regulations		Department of Education	Legal Obligation
School workforce Census – Staff Ethnicity	Education Act 2005, Section 114 and accompanying regulations	Necessary for reasons of substantial public interest.	Department of Education	Legal Obligation
Accident Records	Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 (RIDDOR)		Health & Safety Executive, and Local Authority Health & Safety team (where necessary)	Legal Obligation
Individual Staff Health & Safety Risk Assessments and Personal Emergency Evacuation Plans (PEEP)	Health and Safety at Work etc Act 1974 and accompanying legislation		Not shared externally	
Qualifying Complaint Information	Education Act 2005, Section 11B		Chief Inspector	Legal Obligation
Verification of Right to work in the U.K (Single Central Record)	Immigration, Asylum and Nationality Act 2006, Section 15		Local Authority, Ofsted	Legal Obligation

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	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent OR Necessary for preventative/ occupational medicine	Medical staff i.e. paramedics/ambulance Responsible/First aid trained staff on residential trips	Vital Interest
Staff Dietary Requirements (food allergies)	Necessary for preventative/ occupational medicine	Medical staff i.e. paramedics/ambulance	Vital Interest
Medical Conditions & Staff Emergency Contact Details	Necessary for preventative/ occupational medicine	Medical staff i.e. paramedics/ambulance Responsible/First aid trained staff on residential trips	Vital Interest
Religious belief	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent	Medical staff i.e. paramedics/ambulance	Vital Interest

Table 3 - Personal information we are required to process with the consent of the individual to whom that information ‘belongs’ - Please note, you have the right to withdraw your consent for us to process your data in this way at any time.

Information Type	Third Parties with whom we share the information	Lawful reason for sharing
Photographs	Local Press/Media, Staff Medical Noticeboard, Parents & Community (Newsletter, School Website, social media platforms, Annual Prospectus, Internal school displays, staff photo board).	Consent
Staff Email address and mobile number	Parents, and other members of staff	Public Task

Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task. You have the right to object or restrict processing that is carried out for the purposes of Public Task – However, please note that this is not an absolute right and would only apply in certain circumstances.

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Attendance Records at staff meetings and staff training		Not shared externally	Public Task
Staff personal characteristics i.e Religion/Gender/Ethnicity	Necessary for reasons of substantial public interest	Local Authority – Confidential Recruitment Monitoring, Diocesan Education Service annual census	Public Task & Statistical Purposes
Medical Conditions (including allergies)	Necessary for preventive or occupational medicine.	Medical staff i.e. paramedics/ambulance,	Vital Interests
Information relating to Trade Union Membership where there is industrial action that may impact the function of the school including class and/or school closures.	Article 9 (2) (b) <i>Employment and social security and social protection law</i>	Parents, Governors and other members of staff	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	Third Parties with whom we share the information	Lawful reason for sharing
Recruitment Information – Application forms, interview notes, Medical questionnaires & references	Local Authority & Ofsted	Public Task / Legal Obligation
Absence Records (including number of absences, reasons for absence & self-certifications forms)	Local Authority – HR & Payroll Team	Public Task
Disciplinary action taken	Local Authority – HR advisory team where relevant	Public Task
Grievances	Local Authority – HR advisory team where relevant	Public Task
Staff Information i.e name D.O.B,	Department of Education – school	Legal Obligation

address, contact details, Emergency contact details	workforce census.	
P45 Forms	Local Authority – HR & Payroll team	Public Task
Consent Forms i.e UK GDPR, Policy Agreement	Not shared externally	
Staff personal bank details	Local Authority requirement for Payroll System	Contract
Appraisal Records, appraisal notes, feedback from colleagues, objectives, updated job descriptions, pay & promotion recommendations	Not shared externally	
Staff information, including personal details, N.I number, DBS, Address, Phone number.	Secretary of State, Local Authority, Disclosure & Barring Service,	Legal Obligation