



## **Privacy Notice (How we use school club workforce information)**

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals who work at after-school clubs held on our school premises but who are not directly employed by the school.

We, St Joseph's Catholic Primary School, are the 'data controller' for the purposes of data protection law.

Our data protection officer is Amanda Flack (see 'Contact us' below).

### **The personal data we hold**

We process data relating to those individuals who work at our after-school clubs. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Date of birth
- DBS Checks
- Qualifications in relation to the after-school activity taking place, including job title, training records, relevant qualifications and affiliation to appropriate sporting associations
- Insurance policies
- Photographs – for identification purposes; those taken by our electronic visitor system when you sign in
- Identification documents

### **Why we use this data**

The purpose of processing this data is to help us run the school, including to:

- Fulfill our safeguarding obligations towards pupils
- Make contact if needed to inform of emergency, such as school closure
- Conduct risk assessments

## Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)
  - We have legitimate interests in processing the data

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

## Electronic visitor system

When you visit the school, you will be required to sign in using our electronic visitor management system, which will:

- Capture a photograph of you
- Record your name, time of arrival and departure, and purpose of visit
- Generate a visitor badge displaying your photograph

We process this data under our **public task** and **legitimate interests** lawful bases, as we need to ensure the safety and security of everyone on our school site and to meet our health and safety obligations.

## Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

## Storing this information

Personal data is stored in line with our Data Protection Policy.

We create and maintain a file for each after-school club (paper and electronic). In addition, a detail of the DBS check of the club's workforce is recorded in the school's Single Central Register (SCR). The information contained is kept secure and is only used for purposes directly relevant to the running of the after-school club.

Once the club has ceased running at the school, we will retain and then delete the information in accordance with the school's Retention Policy.

## Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Our regulator - Ofsted - to meet our public interest obligations and safeguarding obligations
- Survey and research organisations- to meet our legal obligation in relation to 'freedom of information' requests
- Professional bodies – such as the Disclosure and Barring Service (DBS) to comply with legal obligations
- Police forces, courts, tribunals – to meet our legal obligations to share certain information, such as safeguarding concerns, the prevention of a crime or to carry out our public task in relations to a tribunal

### Transferring data internationally

Where we transfer personal data overseas, we will do so in accordance with data protection law.

## Your rights

### How to access personal information we hold about you

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our data protection officer.

### Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)

- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

## Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## Contact Us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- Amanda Flack, [admin@stjosephs.dorset.sch.uk](mailto:admin@stjosephs.dorset.sch.uk) 01202 485975.

*This notice is based on the [Department for Education's model privacy notice](#) for the school workforce, amended to reflect the way we use data in this school for after-school club workforce who are not employed directly by the school.*