

Data Protection Policy

Reviewed August 2023

EXECUTIVE STATEMENT

At St Patrick's College we believe privacy is important. We are committed to complying with our data protection obligations and to being concise, clear and transparent about how we obtain and use Personal Information and how (and when) we delete that information once it is no longer required.

We will review and update this data protection policy regularly in accordance with our data protection obligations.

Any queries in relation to this Policy or any of the matters referred to in it should be submitted to the Principal; Mrs C McHugh.

The following policies, procedures and documents are also relevant to this Policy:

- Data Breach Management Procedure
- Subject Access Request Procedure
- Department of Education Document Disposal Schedule
- Bring Your Own Device to School
- Communications / Complaints Policy

**These do not constitute an exhaustive list.*

DATA PROTECTION POLICY

1: Scope

- 1.1. The School is subject to the General Data Protection Regulation (GDPR) which imposes obligations on the School as a data controller in relation to the protection, use, retention and disposal of Personal Information. This Policy sets out the procedures that are to be followed when dealing with Personal Information and applies to all Personal Information processed by or on behalf of St Patrick's College.
- 1.2. You must read this Policy because it gives important information about:
 - 1.2.1. the data protection principles with which St Patrick's College must comply;
 - 1.2.2. what is meant by Personal Information and Special Category Data;
 - 1.2.3. how we gather, use and (ultimately) delete Personal Information and Special Category Data in accordance with the data protection principles;
 - 1.2.4. where more detailed Privacy Information can be found, e.g. about the Personal Information we gather and use about you, how it is used, stored and transferred, for what purposes, the steps taken to keep that information secure and for how long it is kept;
 - 1.2.5. your rights and obligations in relation to data protection; and
 - 1.2.6. the consequences of our failure to comply with this Policy.
- 1.3. Please refer to the School's privacy notices **on our School Website**.

2: Data Protection Principles

- 1.4. GDPR sets out the following principles with which any party handling Personal Information must comply. All Personal Information must be:
 - 1.4.1. processed lawfully, fairly and in a transparent manner;
 - 1.4.2. collected for specified, explicit and legitimate purposes only, and will not be further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
 - 1.4.3. adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed
 - 1.4.4. accurate and, where necessary, kept up to date and take reasonable steps to ensure that inaccurate Personal Information are deleted or corrected without delay;
 - 1.4.5. kept in a form which permits identification of individuals for no longer than is necessary for the purposes for which the information is processed; Personal Information may be stored for longer periods insofar as the data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes subject to implementation of the appropriate technical and organisational measures required by GDPR in order to safeguard the rights and freedoms of the individual; and
 - 1.4.6. processed in a manner that ensures appropriate security of the Personal Information, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3: Lawful, Fair and Transparent Processing

- 1.5. The School will, before any processing of Personal Information starts for the first time, and then regularly while it continues:
 - 1.5.1. process the Personal Information on at least one of the following bases:
 - 1.5.1.1. Consent:**
 - the individual has given their express agreement to the processing of their Personal Information for one or more specific purposes;
 - parental consent will be obtained for any child aged under 13 years old or for children aged over 13 who are not considered capable of giving consent themselves.
 - 1.5.1.2. Contractual:**
 - the processing is necessary for the performance of a contract to which the individual is party or in order to take steps at the request of the individual prior to entering into a contract;
 - 1.5.1.3. Legal Obligation:**
 - the processing is necessary for compliance with a legal obligation to which the School is subject;
 - 1.5.1.4. Vital Interests:**
 - the processing is necessary for the protection of the vital interests

of the individual or another natural person; or

1.5.1.5. **Public Interest:**

- the processing is necessary for the performance of a task carried out in the public interest or exercise of official authority;

1.5.1.6. **Legitimate Interests:**

- the processing is necessary for the purposes of legitimate interests of the School or a third party, except where those interests are overridden by the interests of fundamental rights and freedoms of the individual, in particular where the individual is a child.

1.5.2. except where the processing is based on consent, satisfy ourselves that the processing is necessary for the purpose of the relevant lawful basis (i.e. that there is no other reasonable way to achieve that purpose);

1.5.3. document our decision as to which lawful basis applies to help demonstrate our compliance with the data protection principles;

1.5.4. include information about both the purposes of the processing and the lawful basis for it in our relevant privacy notices **Privacy Notices can be found on our school website.**

1.5.5. where Special Category Data is processed, identify a lawful special condition for processing that information and document it; and

1.5.6. where criminal offence information is processed, identify a lawful condition for processing that information and document it.

2. **Rights of the Individual**

2.1. The GDPR states that individuals have the following rights in respect of the processing of their Personal Information:

2.1.1. **The right to be informed:**

2.1.1.1. The School will keep individuals informed of its processing activities through its privacy notices **Privacy Notices can be found on our school website.**

2.1.1.2. An individual may make a subject access request (“SAR”) at any time to find out more about the Personal Information which the School holds on them. All SARs must be forwarded to the Principal; **Mrs C McHugh, at St Patrick’s College.**

2.1.1.3. The School is required to respond to a SAR within one month of receipt but this can be extended by up to two months in the case of complex and/or numerous requests and, in such cases, the individual will be informed of the need for such extension. The School does not charge a fee for the handling of a straightforward SAR.

2.1.2. **The right to rectification:**

2.1.2.1. If an individual informs the School that Personal Information held by the School is inaccurate or incomplete, the individual can request that it is rectified.

2.1.3. The right to erasure:

2.1.3.1. An individual is entitled to request that the School ceases to hold Personal Information it holds about them.

2.1.3.2. The School is required to comply with a request for erasure unless the School has reasonable grounds to refuse.

2.1.4. The right to restrict processing:

2.1.4.1. An individual is entitled to request that the School stops processing the Personal Information it holds about them in certain circumstances.

2.1.5. The right to data portability:

2.1.5.1. An individual has the right to receive a copy of their Personal Information and use it for other purposes.

2.1.6. The right to object:

2.1.6.1. An individual is entitled to object to the School's processing of their Personal Information.

2.1.7. Rights in relation to automated decision making and profiling:

2.1.7.1. An individual has the right to challenge any decision that is made about them on an automated basis (subject to certain exceptions).

2.1.7.2. The School is also required to comply with certain conditions if it uses Personal Information for profiling purposes.

3. Data Protection Officer

3.1. A Data Protection Officer (DPO) is appointed who will monitor adherence to this policy.

3.2. The DPO is required to have an appropriate level of knowledge.

4. Privacy by Design

4.1. The School has adopted the principle of privacy by design and will ensure that the definition and planning of all new or significantly changed systems that collect or process Personal Information will be subject to due consideration of privacy issues, including the completion of one or more data protection impact assessments.

4.2. The data protection impact assessment will include:

4.2.1. Consideration of how Personal Information will be processed and for what purposes;

4.2.2. Assessment of whether the proposed processing of Personal Information is both necessary and proportionate to the purpose(s);

4.2.3. Assessment of the risks to individuals in processing the Personal Information;

4.3. What controls are necessary to address the identified risks and demonstrate compliance with legislation.

4.4. A data protection impact assessment is conducted by the Principal:

4.4.1. On every business process periodically, at least once a year and more frequently where the amount and/or sensitivity of Personal Information processed, dictates so;

4.4.2. As part of the project calendar admission requirements checklist;

4.4.3. At every high-impact change, and/or at the request of the Data Protection Officer.

5. Data Retention & Disposal

5.1. The longer that Personal Information is retained, the higher the likelihood is accidental disclosure, loss, theft and/or information growing stale.

5.2. Any Personal Information kept by the School is managed in accordance with the Department of Education Disposal of Records Schedule (<https://www.education-ni.gov.uk/publications/disposal-records-schedule>).

6. Data Breach

6.1. A data breach is any (potential) unintended loss of control over or loss of Personal Information within the School's environment. Preventing a data breach is the responsibility of all the School staff and its workforce.

6.2. All documents with student's names, vulnerable information, SEN, Child Protection and Safeguarding should be shredded.

6.3. Please refer to the School's Data Breach Management Procedure.

7. Third-Party Services and Subcontracting

7.1. The School may decide to contract with a third party for the collection, storage or processing of data, including Personal Information for eg: Testwise for Baseline Assessment data.

7.2. If the School decides to appoint a third party for the processing of Personal Information, this must be regulated in a written agreement in which the rights and duties of the School and of the subcontractor are specified. A subcontractor shall be selected that will guarantee the technological and organisational security measures required in this Policy, and provide sufficient guarantees with respect to the protection of the personal rights and the exercise of those rights.

7.3. The subcontractor is contractually obligated to process Personal Information only within the scope of the contract and the directions issued by the School.

8. Complaints

8.1. Complaints will be dealt with in line with the School's complaints policy. **Our Complaints Policy is available upon request from the School Office.**

8.2. 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

9. Definitions

“consent”

is any freely given, specific and transparently, well-informed indication of the will of the individual, whereby the individual agrees that his or her Personal Information may be processed. Particular requirements about consent can arise from the respective national laws.

"Personal Information"

(sometimes known as “personal data”) means any information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly — in particular, by reference to an identification number or to one or more factors specific to his or her physical, physiological, mental, economic, cultural or social identity.

“processing”

means obtaining, recording, organising, storing, amending, retrieving, disclosing and/or destroying information, or using or doing anything with Personal Information.

"Special Category Data"

(sometimes known as “sensitive personal data”) means Personal Information that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data and the processing of data concerning health or sex life biometric data and the processing of data concerning health or sex life

APPENDIX 1

PRIVACY NOTICE POLICY

Updated 2025

For Those Employed to Teach in St Patrick's College

ABOUT US

St Patrick's College 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 those employed to teach at the School 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 can be contacted at:

St Patrick's College

41 Killymeal Rod, Dungannon,

Co Tyrone.

BT6LJ

Email: info@stpatrickcollege.dungannon.ni.sch.uk

Our Data Protection Officer is the Education Authority it monitors the school's data protection procedures to ensure they meet the standards and requirements of the GDPR]. Please contact the Principal, Mrs C McHugh; Data Protection Officer at St Patrick's College.

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 41 Killymeal Rd., Dungannon, Co. Tyrone BT71 6LJ

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 ST PATRICK'S COLLEGE

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)
- special categories of data including characteristics information (such as gender, age, ethnic group, trade union membership, information regarding your health and Access NI 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?

St Patrick's College 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 of employment CCMS has entered into with you
- 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
- examination results and added value outcomes
- complaints and procedures followed

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 school office. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or 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 St Patrick's College 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 Bodies
- Council for Catholic Maintained Schools
- The Department of Education
- 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.

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.

APPENDIX 2

PRIVACY NOTICE POLICY

Updated 2025

For Those Employed in a Non-Teaching Role

ABOUT US

St Patrick's College 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 can be contacted at:

St Patrick's College

41, Killymeal Rd, Dungannon, Co. Tyrone. BT

Tel: 028 87722205

Email: info@stpatrickscollege.dungannon.ni.sch.uk

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 Principal; Mrs C McHugh, Data Protection Officer at St Patrick's College.

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 INDIVIDUALS EMPLOYED IN A NON-TEACHING ROLE AT ST PATRICK'S COLLEGE

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

- personal information (such as name, employee number, national insurance number, next of kin details and emergency contact information, photographs, bank account details and tax status information)
- 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
- 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?

St Patrick's College 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
- complaints & procedures

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

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 at St Patrick's College. 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 St Patrick's College is stored in line with the Department of Education Document Retention and Disposal Policy. This is a link to 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 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 Bodies
- Council for Catholic Maintained Schools
- The Department of Education
- 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.

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.