

**ENGAGE ENRICH EXCEL ACADEMIES**

Record of Processing Activities



**Engage Enrich Excel Academies**  
181 Frimley Road South Camberley Junior Site, Camberley GU15 2BQ  
Company Registration Number 9279884 (England and Wales)

Record of Processing Activities Reviewed Sept 22

This record of processing activities describes how The Cambridge Primary School processes personal data.

We recognise that Article 30 of the General Data Protection Regulation (UK GDPR) imposes documentation requirements on controllers and processors of data. This record is information that is confidential to the School but will be provided to supervisory authorities (such as the Information Commissioner's Office) on request and as required by the UK GDPR.

#### **School Details:**

Address: The Cambridge Primary School  
Queens Avenue  
Wellesley  
Aldershot  
Hampshire  
GU11 4AA

Telephone Number: 01252 314884

Website: <https://www.cambridgeschool.hants.sch.uk>

Data Controller Lead Name: Craig Stilwell

Data Controller Details: Judicium Consulting Ltd  
72 Cannon Street  
London  
EC4N 6AE

Data Controller Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)

#### **Categories of Data Subjects**

The School collect personal data from the following categories of data subjects:

- School employees and job applicants
- School pupils and parents
- School vendors or suppliers

#### **Categories of Personal Data**

The School collects the following categories of personal data about employees and job applicants:

- Personal information and contact details such as name, title, addresses, date of birth, marital status, phone numbers and personal email addresses;
- Emergency contact information such as names, relationship, phone numbers and email addresses;
- Information collected during the recruitment process that we retain during employment including references, proof of right to work in the UK, application form, CV, qualifications;
- Employment contract information such as start dates, hours worked, post, roles;
- Education and training details;
- Details of salary and benefits including payment details, payroll records, tax status information, national insurance number, pension and benefits information;
- Details of any dependants;
- Nationality and immigration status and information from related documents, such as passport or other identification and immigration information;
- Information regarding sickness and absence records such as number of absences and reasons (including sensitive personal information regarding physical and/or mental health);

**Engage Enrich Excel Academies**  
181 Frimley Road South Camberley Junior Site, Camberley GU15 2BQ  
Company Registration Number 9279884 (England and Wales)

- Racial or ethnic origin, sex and sexual orientation, religious or similar beliefs;
- Criminal records information as required by law to enable employees and applicants to work with children;
- Trade union membership;
- Information on grievances raised by or involving employees;
- Information on conduct and/or other disciplinary issues involving employees;
- Details of employee appraisals, performance reviews and capability issues;
- Details of employee time and attendance records;
- Information about the use of our IT, communications and other systems, and other monitoring information;
- Details of employee use of business-related social media;
- Images of staff captured by the School's CCTV system
- Employee use of public social media (only in very limited circumstances, to check specific risks for specific functions within the School, employees will be notified separately if this is to occur);
- Details in references about employees that we give to others.

The School collects the following categories of personal data about pupils and parents:

- Personal information such as name, pupil number, date of birth, gender and contact information;
- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses;
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility);
- Attendance details (such as sessions attended, number of absences and reasons for absence);
- Performance and assessment information;
- Behavioural information (including exclusions);
- Special Educational Needs (SEN) information;
- Relevant medical & dietary information;
- Special categories of personal data (including ethnicity, relevant medical information, Special Educational Needs information);
- Images of pupils engaging in school activities, and images captured by the School's CCTV system;

The School collects the following categories of personal data about vendors and suppliers:

- Name and contact information;
- Financial and payment details;

#### **Purposes of Data Processing**

The School collects and processes personal data about employees and job applicants for the following purposes:

- To determine recruitment and selection decisions on prospective employees;
- In order to carry out effective performance of the employees' contract of employment and to maintain employment records;

- To comply with regulatory requirements and good employment practice;
- To carry out vetting and screening of applicants and current staff in accordance with regulatory and legislative requirements;
- To enable the development of a comprehensive picture of the workforce and how it is deployed and managed;
- To enable management and planning of the workforce, including accounting and auditing;
- To enable personnel management including retention, sickness and attendance;
- To enable performance reviews, managing performance and determining performance requirements;
- In order to manage internal policy and procedure;
- To enable Human Resources administration including pensions, payroll and benefits;
- To determine qualifications for a particular job or task, including decisions about promotions;
- To provide evidence for possible disciplinary or grievance processes;
- To comply with legal obligations;
- To monitor and manage staff access to our systems and facilities in order to protect our networks, the personal data of our employees and for the purposes of safeguarding;
- To manage network and information security, including preventing unauthorised access to our computer network and communications systems and preventing malicious software distribution;
- To facilitate education, training and development activities;
- To monitor compliance with equal opportunities legislation;
- To enable determinations about continued employment or engagement;
- To enable arrangements for the termination of the working relationship;
- To deal with post-termination arrangements;
- For health and safety obligations;
- To facilitate the prevention and detection of fraud or other criminal offences;
- To defend the School in respect of any investigation or court proceedings and to comply with any court or tribunal order for disclosure

The School collects and processes personal data (including special category data) about pupils and parents for the following purposes:

- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents);
- To provide education services and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- To communicate with parents regarding pupil progress and achievement;
- To derive statistics which inform decisions such as the funding of schools
- To assess performance and to set targets for schools;
- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary medical) care;
- To give and receive information and references about past, current and prospective pupils, and to provide references to potential employers of past pupils;
- In order to manage internal policy and procedure;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the school;

- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as diversity or gender pay gap analysis);
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care;
- To enable relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
- To monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's IT security policy;
- To make use of photographic images of pupils in school publications, on the school website and (where appropriate) on the school's social media channels;
- For security purposes, including CCTV in accordance with the school's CCTV policy;
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

The School collects and processes personal data about vendors and suppliers for the following purposes:

- To obtain products and services;
- To enable those suppliers to provide services to the School to enable them to carry out employment and education-based functions;
- For supplier administration and management including evaluation potential suppliers and accounts management;

#### **Categories of Personal Data Recipients**

The School discloses personal data to the following categories of recipients:

- the Department for Education (DfE) - on a statutory basis under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013;
- Ofsted;
- Other Partnership Schools;
- Other Schools that pupils have attended/will attend;
- NHS;
- Welfare Services (such as social services);
- Law enforcement officials such as police, HMRC;
- LADO;
- Training Providers;
- Professional advisors such as lawyers and consultants;
- Support services (including HR support, insurance, IT support, information security, pensions and payroll, parent communication software providers);
- The Local Authority;
- Occupational Health;
- DBS;
- Recruitment and supply agencies.

The School ensures that reasons for sharing data with those organisations are in accordance with the UK GDPR and puts in place appropriate safeguards for any personal data transfers.

### **Personal Data Retention Periods**

Except as otherwise permitted or required by applicable law or regulation, the School only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

To determine the appropriate retention period for personal data, the School considers the amount, nature, and sensitivity of personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for processing the personal data, whether we can fulfil the purposes of processing by other means and any applicable legal requirements.

The School has a data retention policy which it abides by which contains further details about how it retains data.

The School typically retains personal data for 6 years subject to any exceptional circumstances or to comply with laws or regulations that require a specific retention period.

### **Technical and Organisational Security Measures**

The School has implemented the following technical and organisational security measures to protect personal data:

- Encryption of personal data (including the use of secure passwords);
- Segregation personal data from other networks;
- Access control and user authentication;
- Employee training on data protection and information security;
- Written information security policies and procedures;
- Impact assessments and evaluation of risks to personal data;

### **Changes To This Record Of Processing Activities**

The School reserves the right to amend this record of processing activities from time to time consistent with the UK GDPR and other applicable data protection requirements including ICO guidance.