

Penygaer Primary School Privacy Notice Staff June 2026



Penygaer Primary School is the Data Controller for the personal data we hold about you.

How we use your information

The proper handling of staff personal information by the School is very important.

Personal data is any information that relates to a person who can be directly or indirectly identified from the information. The terms 'information' and 'personal data' are used throughout this privacy notice and have the same meaning.

To ensure that the School treats personal information correctly, we seek to adhere in full to the requirements of Data Protection legislation.

This privacy notice has therefore been produced to explain as clearly as possible what we do with your personal data.

1. The purposes for which we use personal data

The information we collect about you and will be used for the purposes of:

- Recruiting school staff
- Managing our employees

Our lawful bases for processing personal data are:

- **Article 6(1)(b) – Performance of a contract**, for employment-related processing.
- **Article 6(1)(c) – Legal obligation**, for example complying with safeguarding law, HMRC requirements, payroll law, education regulations and health and safety legislation.
- **Article 6(1)(e) – Public task**, where processing is necessary to deliver education and comply with statutory school functions.
- **Article 6(1)(f) – Legitimate interests**, where used for site security, IT monitoring, prevention of fraud, or internal management purposes.

Where we process special category data, our lawful bases are:

- **Article 9(2)(b)** – Employment, social security and social protection law.
- **Article 9(2)(g)** – Reasons of substantial public interest.
- **Schedule 1, Part 1 (1) (DPA 2018)** – Employment law obligations.

- **Schedule 1, Part 2 (18) (DPA 2018)** – Safeguarding of children and individuals at risk, equality monitoring, preventing or detecting unlawful acts.

2. What type of information do we use?

We collect the following types of personal data:

- personal information (such as name, employee or teacher number, national insurance number)
- characteristics information (such as gender, age, ethnic group)
- contract information (such as start date, hours worked, post, roles and salary information)
- work absence information (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught)
- We may also collect, use and store information about criminal convictions, offences and prohibitions. This information may have come from organisations such as the Disclosure & Barring Service. Where we process data about criminal convictions, offences or barring decisions (e.g., through the Disclosure and Barring Service), we rely on:
 - **Article 6(1)(c)** – Legal obligation
 - **DPA 2018, Schedule 1, Part 1 (1)** – Employment law
 - **DPA 2018, Schedule 1, Part 2 (18)** – Safeguarding of children and individuals at risk
- We also use a CCTV system in the school but do NOT record images. This is to keep children and our employees safe.

We also store relevant medical information, addresses, and other payroll information on Teacher Centre and/or Recourse Link

3. Do we use information received from other sources?

The School collects information directly from you but we also receive information from the following sources:

- Carmarthenshire County Council Education & Children Services department
- Other local authorities
- The National Health Service (NHS)
- Previous employers (references)
- Disclosure & Barring Service
- Occupational health providers
- EWC (registration/disciplinary status)

4. Who we share your personal information with

We share your information with the following recipients

- Carmarthenshire County Council
- Welsh Government
- The National Health Service (NHS)
- Education Workforce Council
- Disclosure & Barring Service
- Ceredigion County Council, who provide our management information system
- We do not routinely transfer your personal data outside the UK. If a transfer is required (for example, where software hosting is located abroad), we will ensure appropriate safeguards are in place under the UK GDPR, such as an adequacy regulation or an International Data Transfer Agreement (IDTA), to ensure your information remains protected.
- third-party software/applications such as Parent Pay, Class Dojo, SeeSaw, Speakr, Charanga, Winning with Numbers

There are also other specific situations where we may be required to disclose information about you, such as:

- Where the Council is required to provide the information by law
- Where disclosing the information is required to prevent or detect a crime
- Where disclosure is in the vital interests of the person concerned

5. How long we will keep your information

We will hold your personal information in line with the School Retention Schedule which follows guidance from the Information and Records Management Society (IRMS) retention record keeping guidelines, after which time it will be securely destroyed.

[Information and Records Management Society Ltd](#)

6. Your Data Protection rights

The UK-GDPR gives you certain rights about how their information is collected and used.

Requesting access to your personal data

To make a request for your personal information, or be given access to your child's educational record, contact the school admin (admin@penygaer.ysgolccc.cymru) or the

School Data Protection Officer:

Mr Alun Stephens up until 31st August 2026 alun.stephens@penygaer.ysgolccc.cymru

From 1st September 2026 Mrs Helen Conway helen.conway@penygaer.ysgolccc.cymru

If you make a request, we will keep a record of the request and any personal data supplied for a suitable period after its fulfilment, in order to deal with any questions, you, your representatives or regulators may have about it.

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called **'right to be informed'**.
- the right to ask us for copies of personal information we have about you – this is called **'right of access'**, this is also known as a **subject access request (SAR)**, data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called **'right to rectification'**.
- the right to ask us to delete your personal information – this is called **'right to erasure'**.
- the right to ask us to stop using your information – this is called **'right to restriction of processing'**.
- the **'right to object to processing'** of your information, in certain circumstances
- rights in relation to **automated decision** making and profiling.
- the right to **withdraw consent** at any time (where relevant).
- the right to **complain** to the Information Commissioner if you feel we have not used your information in the right way.

There are legitimate reasons why your information rights request may be refused. For example, some rights will not apply:

- **right to erasure** does not apply when the lawful basis for processing is legal obligation or public task.
- **right to portability** does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- **right to object** does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the **lawful basis** is **consent**, you don't have the right to object, but you have the right to withdraw consent.

We will always seek to comply with your request however we may be required to hold or use your information to comply with legal duties. Please note: your request may delay or prevent us delivering a service to you.

7. Freedom of Information Act 2000 and Environmental Information Regulations 2004

As a public body, [Add school] is subject to requests made under the above legislation. Therefore, we have a legal obligation to process any personal data we hold when considering requests under these laws.

However, we will never disclose personal data in our responses to these requests where to do so would contravene the principles of data protection.

8. Contact details

If you wish to discuss the way we are collecting or using your personal data, you can contact us at admin@penygaer.ysgolccc.cymru

The School Data Protection Officer is contactable at: schooldpo@carmarthenshire.gov.uk

9. Complaints

If you have any concerns about how the school handles your personal data, you have the right to make a complaint. We encourage you to raise any concerns with us in the first instance so that we have the opportunity to investigate and resolve the issue.

You can do this by contacting: admin@penygaer.ysgolccc.cymru or 01554 750900

We will acknowledge your complaint within 30 days and will aim to investigate and respond without undue delay. We will keep you informed of the outcome and any actions taken.

If you are not satisfied with our response, or if you believe we have not handled your complaint appropriately, you have the right to lodge a complaint with the Information Commissioner's Office (ICO): [Information Commissioner's Office](#) Telephone: 0303 123 1113

For further information about your data protection rights, please refer to the ICO's guidance on individuals' rights under UK GDPR. [see the guidance from the UK Information Commissioners Office \(ICO\)](#)