Privacy Notice (How we use workforce information)

The categories of school information that we process

These include:

- Personal information (such as name, employee or teacher number, national insurance number and address)
- Characteristics (such as ethnicity, language, nationality, country of birth)
- Safeguarding information (such as DBS certificate number)
- Contract information (such as start dates, hours worked, post, roles and salary information)
- Qualification information (where relevant to the role)
- Financial information (such as bank details for payments and reimbursements)
- Performance management information
- Work absence information (such as number of absences and reasons and return to work forms)
- Medical information (such as pregnancy related information and occupational health reports)
- Biometric information (linked to our catering system)

This list is not exhaustive.

Under the UK General Data Protection Regulation (UK GDPR), the legal bases we rely on for processing workforce information are:

- Article 6(b) – performance of a contract;
- Article 6(c) - legal obligation;
- Article 6(e) – performance of a task carried out in the public interest.

For the collection, storage and use of workforce biometric data, explicit consent has been obtained.

Why we collect and use workforce information

We use school workforce data to:

- to enable the development of a comprehensive picture of the workforce and how it is deployed
- to inform the development of recruitment and retention policies
- to enable individuals to be paid and pension information passed to pensions providers
- to monitor absence
- to keep staff safe (for example, food allergies and emergency contact details)
- to meet the statutory duties placed upon us by the Department for Education
- for the school to fulfil their official functions and meet legal requirements
Under the General Data Protection Regulation (GDPR), the legal basis / bases we rely on for processing personal information for general purposes are: Collecting this information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

Storing this information

We hold non-operational school workforce data for 25 years after the individual member of staff has left the school. We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please visit the GDPR pages on TDS online.

Who we share this information with

We routinely share this information with:

- The Department for Education (DfE)
- Our local authority
- EVOLVE (off-site visits system)
- TEAMS
- SIMS
- Civica (School Lunch biometrics)
- Healthscope (for occupational health referrals)
- School Cloud (Parent Evenings)
- Schoolcomms (Parent communication and gateway)
- SignIn App for signing In and Out of school site

Why we share school workforce information

We do not share information about our workforce members with anyone unless the law and our policies allow us to do so.

Local authority – We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Department for Education (DfE) – We share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding / expenditure and the assessment educational attainment.

Data collection requirements

The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005.
To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to https://www.gov.uk/education/data-collection-and-censuses-for-schools.

The Department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested; and
- the arrangements in place to securely store and handle the data

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.

For more information about the Department’s data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

To contact the Department: https://www.gov.uk/contact-dfe

**Requesting access to your personal data**

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the DPO via email dpo@thedownsschool.org

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the
Information Commissioner’s Office at https://ico.org.uk/concerns/

**Withdrawal of consent and the right to lodge a complaint**

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting either the HR Manager or the DPO directly.

**Further information**

If you would like to discuss anything in this privacy notice, please contact the DPO by emailing dpo@thedownsschool.org. This notice will be reviewed annually by the DPO and presented periodically at Full Governing Board meetings.