



Hackleton CEVA Primary School

Inspiring learning for life

Hackleton CEVA Primary School

Privacy Notice – School Workforce

Privacy notice for staff

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’ to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our school.

We, Hackleton CEVA Primary School, Main Road, Hackleton NN7 2AB, are the ‘data controller’ for the purposes of data protection law.

Our data protection officer is Ruth Hawker – Plumsun, telephone 0845 862 2684.

Privacy notice – how school workforce information is used

What categories of information are processed?

The categories of personal information that we process include the following:

- Personal identifiers, contacts and characteristics (such as name, date of birth, telephone numbers, email addresses, address, postcode, identification documents)
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary and annual leave
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Photographs
- CCTV footage

We may also collect, store and use information about you that falls into “special categories” of more sensitive personal data. This includes information about (where applicable):

- Race, religious beliefs. Sexual orientation and political opinions.

- Trade union membership
- Health, including any medical conditions, and sickness records

This list is not exhaustive – to access the current list of categories of information the school processes, please see the school’s Data Asset Register, a copy of which can be obtained by contacting the school office.

Why do we collect and use your information?

We collect and use your information for the following reasons:

- To enable you to be paid
- Facilitate safer recruitment, as part of our safeguarding obligations towards pupils
- Support staff training
- Support effective performance management
- To comply with the law regarding data sharing
- Enable ethnicity and disability monitoring
- To enable the development of a comprehensive picture of the workforce and how it is deployed
- Allowing better financial modeling and planning;
- To inform the development of recruitment and retention policies
- Support the work of the School Teachers’ Review Body

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

- You have given us consent to use it in a certain way
- We need to comply with a legal obligation
- Carry out a task in the public interest

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

- We need to protect your vital interests (or someone else’s interests)
- We have a legitimate interest in processing the data

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing employee’s information are: Article 6

1. Processing shall be lawful only if and to the extent that least one of the following applies:
 - (a) The data subject has **given consent** to the processing of his or her personal data for one or more specific purposes
 - (c) Processing is necessary for compliance with a **legal obligation** to which the controller is subject
 - (e) Processing is necessary for the performance of a task carried out in the **public interest** or in the exercise of official authority vested in the controller;
 - (d) Processing is necessary in order to protect the **vital interests** of the data subject or of another natural person
 - (f) Processing is necessary for the purposes of the **legitimate interests** pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Point (f) of the first subparagraph shall not apply to processing carried out by public authorities in the performance of their tasks.

To process special category data we need additional lawful basis. We will process special category data most commonly where:

- We have your explicit consent

- The processing is necessary under social security or social protection law

Article 9(2)

- (a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject
- (b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;
 1. Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.
 2. Paragraph 1 shall not apply if one of the following applies:
 - (j) Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Further information regarding data collection can be found in the Education Act 1996 within guide documents on the following website: <https://www.gov.uk/education/data-collection-and-censuses-for-schools> Article 6

How do we collect your information?

We collect your personal information via the following methods:

- Job application forms
- Staff contract forms
- Medical forms e.g. fit notes, self-certification forms

Workforce data is essential for the school's operational use. Whilst most information you provide to us is mandatory, some of it is requested on a voluntary basis. To comply with the UK GDPR, we will inform you at the point of collection whether you are required to provide certain information to us or if you have a choice.

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.

How do we store your information?

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for the purposes directly relevant to your employment.

Once your employment with us has ended, your personal information is retained in line with the school's Records Management Policy, a copy of which can be requested from the school office.

For more information about how we securely store your information, please see the school's Security Breach Management Plan, a copy of which can be obtained from the school office.

Who do we share your information with?

We routinely share your information with:

- The LA, where applicable
- The DfE
- EPM, our payroll provider

Why do we share your information?

We do not share information about you with anyone without your consent, unless the law and our policies allow us 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.

Sharing with the LA

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

Sharing with the DfE

The DfE collects personal data from educational settings and LAs via various statutory data collections.

We are required to share information about you with the DfE for the purpose of these data collections, under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

All information we share with the DfE is transferred securely and held by the DfE under a combination of software and hardware controls which meet the current government security policy framework, which can be found by following the link below:

<https://www.gov.uk/government/publications/security-policy-framework>

How does the government use your data?

The workforce information that we lawfully share with the DfE through data collections:

- Informs the DfE's policy on pay and the monitoring of the effectiveness and diversity of the school workforce.
- Links to school funding and expenditure.
- Supports longer term research and monitoring of educational policy.

You can find more information about the data collection requirements placed on us by the DfE by following this link: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

The DfE may share your information with third parties who promote the education or wellbeing of children or the effective deployment of school staff in England by:

- Conducting research or analysis.
- Producing statistics.
- Providing information, advice or guidance.

The DfE 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 and use of the information. The DfE makes

decisions on whether they will share personal information with third parties based on an approval process, where the following areas are considered in detail:

- Who is requesting the information.
- The purpose for which the information is required.
- The level and sensitivity of the information requested.
- The arrangements in place to securely store and handle the information.

To have access to school workforce information, organisations must comply with strict terms and conditions covering the confidentiality and handling of information, security arrangements and retention of the information.

How to find out what personal information the DfE holds about you

Under the Data Protection Act 2018, you are entitled to ask the DfE what personal information it holds about you. You have the right to ask the DfE:

- If it processes your personal data.
- For a description of the data it holds about you.
- The reasons it is holding your data and any recipient it may be disclosed to.
- For a copy of your personal data and any details of its source.

To exercise these rights, you should make a subject access request. Information on how to do this can be found by following this link: <https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>.

You can also contact the DfE directly using its online contact form by following this link: <https://www.gov.uk/contact-dfe>.

What are your rights?

You have specific rights to the processing of your data; these are the right to:

- Request access to the information the school holds about you.
- Restrict our processing of your personal data, i.e. permitting its storage but no further processing.
- Object to direct marketing (including profiling) and processing for the purposes of scientific and/or historical research and statistics.
- Have your personal data rectified if it is inaccurate or incomplete.
- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.
- Request the deletion or removal of personal data where there is no compelling reason for the continued processing.

If you want to request access to the personal information we hold about you, please contact Mrs Sally Gillam on 01604 870086 or email head@hackleton.northants-ecl.gov.uk

If you are concerned about the way we are collecting or using your information, please raise your concern with the school's DPO in the first instance. You can also contact the ICO at <https://ico.org.uk/concerns>.

How to withdraw consent and lodge complaints

Where our school processes your personal data with your consent, you have the right to withdraw your consent at any time.

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 the headteacher, Mrs Sally Gillam on 01604 870086 or email head@hackleton.northants-ecl.gov.uk

You can also contact our Data Protection Officer:

Ruth Hawker - Plumsun Ltd

Email: info@plumsun.com

Tel: 0845 862 2684

Address: Almshouses, Great Brington, Northampton NN7 4HY

Alternatively, you can make a complaint to the Information Commissioners Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 113
- Or write to the Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Updating this privacy notice

We may need to update this privacy notice periodically if we change how we collect and process data. The school will inform you when this privacy notice has changed; however, we also recommend that you revisit this privacy notice periodically.

This privacy notice was last updated in October 2023.

How can you find out more information?

If you would like to discuss anything in this privacy notice, please contact Ruth Hawker on 0845 862 2684.

If you require further information about how we and/or the DfE store and use your personal data, please visit our website, <https://www.hackletoncevapprimary.org.uk/> and download our Data Protection Policy or the Gov.UK website (<https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>).