Privacy Notice-School Workforce
How we use the School Workforce's information

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' (sometimes called 'fair processing 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.**

Town Farm Primary School, (the School) are the 'Data controller' for the purposes of data protection law.

We have appointed Grow Education Partners Ltd as our data protection officer (DPO) and the responsible contact is David Coy (see 'Contact us' below).

1. The personal data process.

Personal data that we may collect, use, store, and share (when appropriate) about those we employ or otherwise engage to work at our school includes, but is not restricted to:

- Personal Information (such as name, date of birth, national insurance number, next of kin, dependents, marital status)
- Contact details (such as telephone number, email address, postal address, for you and your emergency contacts)
- Protected characteristics (such as trade union membership, nationality, language, ethnic origin, sexual orientation, religion or belief, where this has been provided)
- Relevant medical information (such as physical or mental health conditions, including for any disabilities for which the organisation needs to make any reasonable adjustments to fulfil its duty of care)
- Information about your remuneration (such as salary, annual leave, pension, bank details, payroll records, tax status and benefits information)
- Information from pre-employment background checks (such as criminal record, online search)
- Recruitment information, (such as 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 (such as work history, job titles, working hours, training records and professional memberships)
- Assessments of your performance (such as appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence)
- Outcomes of any disciplinary and/or grievance procedures, including any warnings issued to you and related correspondence
- Details of periods of absence (such as holiday, sickness, family leave, sabbatical, including the reasons for the leave)
- Photographs & Video (for internal safeguarding & security purposes, school newsletters, media, and promotional purposes)
- Closed-circuit television (CCTV) footage
- Data about your use of the school's information and communications system.

We may also hold personal data about you from third parties, such as references supplied by former employers, information provided during the completion of our pre-employment checks, and from the Disclosure & Barring Service, in order to comply with our legal obligations and statutory guidance.

A full breakdown of the information we collect on the School Workforce can be requested by contacting the Business Manager by emailing sbm@town-farm.surrey.sch.uk.

2. Why we process this data.

The purpose of processing includes but is not limited to:

- Running the school in an effective and efficient manner
- Enabling you to be paid and other benefits to be provided
- Facilitating safeguarding as part of our safeguarding obligations towards pupils
- Fulfilling our legal obligations in recruiting individuals to the school workforce
- Supporting effective performance management and appraisal
- Supporting effective management of the school workforce, along with the implementation of school policies and procedures
- Providing feedback to your training centre and awarding body
- Informing our recruitment and retention policies
- Allowing better financial modelling, administration and planning
- Providing references where requested
- Equalities monitoring and reporting
- Responding to any school workforce issues
- Improving the management of workforce data across the sector
- Supporting the work of the School Teachers' Review Body
- Assessing the quality of our services
- Complying with the law regarding data sharing.

3. The lawful basis for using this data

This section contains information about the legal basis that we are relying on when handling your information. These are defined under data protection legislation and for personally identifiable information are:

- To fulfil a contract with you
- You have given consent for one or more specific purposes
- Processing is necessary to comply with the school's legal obligations
- Processing is necessary to protect your vital interests
- Processing is necessary for tasks in the public interest or exercise of authority vested in the controller (the provision of education)
- Processing is necessary for the school's legitimate interests or the legitimate interests of a third party.

When we process special category information, which is deemed to be more sensitive, the following lawful basis are used:

- You have given explicit consent
- Employment, social security and social protection
- It is necessary to fulfil the school's obligations or your obligations
- It is necessary to protect your vital interests

- Processing is carried out by a foundation or not-for-profit organisation (includes religious, political or philosophical organisations and trade unions)
- Reasons of public interest in the area of public health.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you can withdraw consent if you wish to do so.

4. Collecting this data.

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

5. How we store this data.

We collect, store and process data for each member of the school workforce. The information is contained in a virtual and/or physical file which is kept secure and only used for purposes directly relevant to your employment.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our retention policy, a copy of which can be requested from the Business Manager by emailing sbm@town-farm.surrey.sch.uk.

6. Who we share this data with.

In order for us to legally, effectively and efficiently function we are required to share data with appropriate third parties, including but not limited to:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about headteacher performance and staff dismissals
- The Department for Education- to meet our legal obligations to share certain information.
- Educators and examining bodies-such as ensuring we adhere to examining regulations to guarantee the validity of examinations
- Training centres and awarding bodies-in order to provide information and feedback on your performance.
- Your families and representatives- such as in the event of an emergency
- Financial organisations e.g., Pension Scheme, HMRC
- Ofsted-during the course of a school inspection
- Suppliers and service providers – to enable them to provide the service we have contracted them for such as HR, payroll, IT.
- Central and local government- such as workforce analysis
- Our auditors - to ensure compliance with our legal obligations
- Health authorities (NHS) and Occupational Health and employee support schemes to ensure the wellbeing of our staff body
- Health and social welfare organisations
- Professional advisers and consultants- for us to develop our services and best provide our public service
- Trade Unions and Professional Associations - to enable them to provide the service their members require
- Charities and voluntary organisations
- Police forces, courts, tribunals, Security organisations- to create a secure workplace for all staff

- Professional bodies
- Employment & recruitment agencies and future employers - to support reference requests.

7. Transferring Data Internationally

We may send your information to other countries when:

- we or a company we work with store information on computer servers based overseas; or
- we communicate with you when you are overseas.

We conduct due diligence on the companies we share data with and note whether they process data in the UK, EEA (which means the European Union, Liechtenstein, Norway and Iceland) or outside of the EEA.

The UK and countries in the EEA are obliged to adhere to the requirements of the GDPR and have equivalent legislation which confer the same level of protection to your personal data.

For organisations who process data outside the UK and EEA we will assess the circumstances of how this occurs and ensure there is no undue risk.

Additionally, we will assess if there are adequate legal provisions in place to transfer data outside of the UK.

8. Why we share your information.

In order to successfully perform our key functions, we need to share personal data with organisations For example, 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

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

9. 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

10. Data Protection Rights

Individuals have a right to make a **'subject access request'** to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- NOT provide information where it compromises the privacy of others
- Give you a copy of the information in an intelligible form.

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

In most cases, we will respond to subject access requests within 1 month, as required under data protection legislation However, we are able to extend this period by up to 2 months for complex requests or exceptional circumstances.

Your other rights regarding your data:

You may:

- Withdraw your consent to processing at any time (This only relates to data for which the school relies on consent as a lawful basis for processing)
- Ask us to rectify, erase or restrict processing of your personal data, or object to the processing of it in certain circumstances and where sufficient supporting evidence is supplied

- Prevent the use of your personal data for direct marketing
- Challenge processing which has been justified on the basis of public interest, official authority or legitimate interests.
- Request a copy of agreements under which your personal data is transferred outside of the United Kingdom
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect you)
- Request a cease to any processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Refer a complaint to the ICO
- Ask for your personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances)

The School will comply with the Data Protection legislation in regard to dealing with all data requests submitted in any format, but individuals are asked to preferably submit their request in written format to assist with comprehension.
Requests should include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the request

If you would like to exercise any of the rights or requests listed above, please contact the Business Manager via.

- Email: sbm@town-farm.surrey.sch.uk
- Telephone: 01784 254 380
- Post: Town Farm Primary School, St Mary's Crescent, Stanwell, Staines, TW19 7HU

We reserve the to verify the requester's identity by asking for Photo ID. If this proves insufficient, then further ID may be required.

Article 22 of the UK GDPR has additional rules to protect individuals from decisions made solely for the purpose of automated decision-making and profiling. The school does not carry out any automated decision-making and/or profiling on the workforce.

11. Data Protection Breaches

If you suspect that your or someone else's data has been subject to unauthorised or unlawful processing, accidental loss, destruction or damage, we ask that you please contact Vicki Prince, Business Manager at Town Farm Primary School and Nursery by emailing sbm@town-farm.surrey.sch.uk to advise us without undue delay.

12. Complaints

We take any complaints about our collection and use of personal information very seriously.
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 the school in the first instance via the School Business Manager.

- Email: sbm@town-farm.surrey.sch.uk
- Telephone: 01784 254 380 ext 224

- Post: Town Farm Primary School, St Mary's Crescent, Stanwell, Staines, TW19 7HU

This complaint may be assessed by our independent Data Protection Officer, David Coy, with a final response provided within 30 days.
If you are unhappy with the school's final response you can refer the matter to the Information Commissioner's Office:

- Report a concern online at https://ico.org.uk/concerns/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

13. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact either our School Data Protection Lead, Vicki Prince contactable on sbm@town-farm.surrey.sch.uk or our independent Data Protection Officer, David Coy (contactable on david.coy@london.anglican.org, 020 3837 5145).

14. Changes to this Privacy Notice.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.