

# PRIVACY NOTICE

<College Road Primary School Employees, Volunteers, Apprentices, Contractors and Agency Staff Privacy Notice>

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## INTRODUCTION

Being transparent and providing accessible information to individuals about how we use personal information is a key element of the Data Protection Act and the General Data Protection Regulation (Regulation (EU) 2016/679).

This data is collected in a number of ways but namely via application forms and other information you provide, agencies, Disclosure & Barring Service, Previous Employers, Teacher Services and/or our Local Authority. This document provides information on the data collected and how it is used.

## THE CATEGORIES OF INFORMATION THAT WE PROCESS INCLUDE:

- Personal identifiers for you (such as name, address, payroll number, teacher reference number, National Insurance number, emergency contact details and address);
- Identity Verification (such as driving licence, passport, utility bill); <\*Driving licence may also be processed for driving school vehicles.> *include only if appropriate.*
- Equal Opportunities Information (your gender, race or ethnicity, religion or belief, sexual orientation, age, disabilities);
- Recruitment information (including copies of right to work documentation, references and other information as part of the application process);
- Disclosure and barring service certification, including information about criminal convictions and offences;
- Employment details (such as dates of employment, role, hours worked, salary, holiday entitlement);
- Employment records since joining the school (including a copy of your <main terms and conditions/contract of employment *delete as appropriate*>, copies of changes to the contract, job titles, Display Screen Equipment (DSE) assessments, work history, working hours, training records (including induction) and professional memberships);
- Information relating to your health (such as details about work relevant illness or disability).
- Absence/attendance information (to include lateness, holiday, whether absence is authorised / unauthorised, maternity/paternity/adoption/dependents leave, compassionate leave, sickness absence, period of absence, number of absences and reasons);
- Qualifications (and, where relevant, subjects taught);
- Details of any accidents connected with work, including on the way to and from work. This will include entry to our accident book/other (specify) reporting system *delete as appropriate*>, details of any first aid given, details of health and safety investigations undertaken and details of reports to relevant authorities for health and safety purposes.
- Photograph for ID purposes;
- Marital status and dependants, next of kin and emergency contact information;
- Payroll Information; Bank account details, sick pay, pension and tax status information (including tax code);
- Trade Union membership and political opinions;
- Performance and appraisal information;
- Disciplinary and grievance information;
- Details of termination of employment;
- CCTV footage and other information obtained through electronic means such as swipe card records;
- Information about your use of our information and communications systems;

This list is not exhaustive, to access the current list of categories of information we process please see our data asset register.

## **PROCESSING PERSONAL INFORMATION**

The Data Protection Act 2018 and the EU General Data Protection Regulation ensure that we comply with a series of data protection principles when processing personal data. These principles are there to protect you and they make sure that we:

- Process all personal information lawfully, fairly and in a transparent manner;
- Collect personal information for a specified, explicit and legitimate purpose;
- Ensure that the personal information processed is adequate, relevant and limited to the purposes for which it was collected;
- Ensure the personal information is accurate and up to date;
- Keep your personal information for no longer than is necessary for the purpose(s) for which it was collected;
- Keep your personal information securely using appropriate technical or organisational measures;

## **WHY WE COLLECT AND USE PERSONAL INFORMATION**

The personal data we collect is essential for our school to fulfil our official functions and meet legal requirements. This information ensures that we provide an effective and efficient service to our school community. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with 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 in this.

We collect and use your information to:

- Make decisions based on fact; (such as, but not limited to pay and promotions)
- Know what staff resources are available to meet the needs of the school;
- To ensure that you are appropriately qualified to carry out the job for which you are employed (both at the point of recruitment and for ongoing professional development);
- To check you are legally entitled to work in the UK;
- To keep our pupils safe;
- To make sure that we can provide any reasonable adjustments in relation to your physical or mental health, to enable you to carry out the job for which you are employed; (this includes assessing your fitness to work);
- To define the terms of your contract and administer these;
- Accurately assess levels of performance, conduct performance review meetings, and create development plans;
- Understand your absence levels, sickness, and lateness and take appropriate timely action;
- To manage disciplinary and grievance matters;
- For the formulation and implementation of employment policies and procedures for recruitment, training, promotion and dismissal;
- To ensure you receive your correct pay, pension and other entitlements and benefits;
- To monitor fair and consistent treatment of staff (including providing equal opportunities);
- To ensure that your working hours meet the Working Time Regulations;
- To manage our business, including adherence to budgets, understanding staff turnover levels, planning and forecasting and acting on this information;

- To ensure that we meet statutory requirements such as minimum wage, pay statements and sick pay;
- To keep you safe and well at work by meeting Health and Safety regulations, including management of accidents and injuries in the workplace and DSE assessments;
- To deal with legal disputes involving you or other employees, workers and contractors;
- To prevent fraud;
- To pay trade union membership;
- For auditing purposes, both internal and external, including from professional bodies such as Ofsted;
- To comply with employment law obligations.

GDPR also requires that we have a lawful basis to collect and use workforce information. For the specific basis used for each category of information please refer to our data asset register. We will only process personal data where we have grounds (lawful basis) for that processing:

- **Consent:** the individual has given clear consent for the school to process their personal data for a specific purpose.
- **Contract:** the data needs to be processed so that the school can fulfil a contract we have with the individual, or the individual has asked the school to take specific steps before entering into a contract.
- **Legal obligation:** the data needs to be processed so that the school can comply with the law (not including contractual obligations).
- **Vital interests:** the data needs to be processed to protect someone's life.
- **Public task:** the data needs to be processed so that the school, as a public authority, can perform a task in the public interest, and carry out its official functions. The task or function has to have a clear basis in law.
- **Legitimate interests:** the data needs to be processed for the legitimate interests of the school or a third party (provided the individual's rights and freedoms are not overridden)

## CONSENT

Where we are relying on consent for processing your personal information we will be explicit about why we are processing your information and will only use your consent for the reasons that we have specified.

### Withdrawal of consent

Where we are processing 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 <business manager/administrator/other> on <tel no> or by emailing <email>.

## INFORMATION SHARING

We do not share information about our workforce members with anyone without consent unless the law and our policies allow us to do so. We will only ever share information if we are satisfied that our

partners or suppliers have sufficient measures in place to protect your information in the same way that we do.

We will never share personal information for marketing purposes.

**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):** The DfE collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our school employees with the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

*Please see appendix A for details about how the government use your information.*

We also routinely share your personal information with the following third parties.

- Our HR and Legal providers
- Our Payroll provider
- Our Auditors
- Our Pensions Administrators
- Our IT provider
- Capita SIMs, our Management Information System;

## RETENTION PERIODS

- We will not keep data for longer than we need it. Data will be retained in line with the [Information and Records Management Society's toolkit for schools](#).
- Personal Data will be safely destroyed or deleted when it is no longer needed.

## INDIVIDUAL RIGHTS REGARDING PERSONAL DATA

Under data protection legislation, you have rights in relation to information about you that we hold.

You have the right:

- To be informed via Privacy Notices such as this;
- To ask us for access to information about you that we hold;
- To have your personal data rectified, if it is inaccurate or incomplete;
- To request the deletion or removal of personal data to prevent processing unless we have a legal obligation to process your personal information;
- To restrict our processing of your personal data (i.e. permitting its storage but no further processing);
- To data portability. We need to be able to provide you with your personal data in a structured, commonly used, machine readable form when asked;
- To object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics;
- Not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.

To make a request under any of your rights please refer to the 'Subject Rights Advice & Application Form' or contact the Data Protection Officer.

If you have a concern or complaint about the way we are collecting or using your personal data, you

should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## **LAST UPDATED**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated October 2018.

## **DATA CONTROLLER**

College Road Primary School is registered as a data controller with the Information Commissioner's Office (registration number: tbc).

## **CONTACT**

If you would like to discuss anything in this privacy notice, please contact: our Data Protection Officer, Liz Easterbrook in writing at Finance, Plymouth City Council, Ballard House, West Hoe Road, Plymouth, PL1 3BJ, by telephone on 01752 398380 or by email at [dataprotectionofficer@plymouth.gov.uk](mailto:dataprotectionofficer@plymouth.gov.uk)

## **APPENDIX A**

## HOW GOVERNMENT USES YOUR DATA

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

- informs departmental 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

### Data collection requirements

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>.

### Sharing by the Department

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.

To contact the department: <https://www.gov.uk/contact-dfe>