



Privacy Notice for School Workforce (How we use workforce information)

Sparsholt C of E Primary School is the Data Controller for the use of personal data in this privacy notice. The school collects, uses and is responsible for certain personal information about our school workforce.

When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws. Our Data Protection Officer is Carol Sheppeck.

The categories of school workforce information that we control and process:

- personal information (such as name, address, employee or teacher number, national insurance number, photographs, national security number)
- payroll information (salary, bank information)
- 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)
- performance information
- Information regarding disciplinary or grievance issues

In addition, we may process the following 'special category information':

- Relevant health or medical information (such as in respect of absences)
- Trade Union membership
- Race, ethnicity or religious beliefs, sexual orientation

This list is not exhaustive. To access the current list of categories of information we process please request to see our data retention register from the school office.

We use school workforce data to:

- enable individuals to be paid
- enable safe recruitment and compliance with associated responsibilities
- enable and support performance management
- inform the development of recruitment and retention policies
- enable the development of a comprehensive picture of the workforce and how it is deployed
- enable equalities monitoring and compliance with equalities duties
- inform national workforce policy monitoring and development
- inform financial audits of the school
- enable sickness monitoring
- fulfil our duty of care towards staff

Our lawful basis for using this data:

Under the General Data Protection Regulation (GDPR), the legal basis / bases we rely on for processing personal information for general purposes are:

- for the purposes of performance of a contract (e.g. contracts of employment, contracts for services etc)
- Where processing is necessary for compliance with legal obligations of the Governing Body (e.g. including but not limited to legal obligations under the Education Act 2002; Education Act 2005, the School Staffing Regulations 2009; the Employment Rights Act 1996, relevant

- tax law and other employment law obligations)
- Where processing is necessary for the performance of a task carried out in the public interest or exercise of official authority vested in the Governing Body (e.g. education functions associated with running a school).

In addition, concerning any special category data:

- Where processing is necessary for the purposes of carrying out obligations and exercising rights of the school or staff in the field of employment
- Where processing is necessary for reasons of substantial public interest (e.g. connected to the education functions associated with running a school)
- Where processing is necessary for the purposes of preventive or occupational medicine (e.g. where occupational health advice is sought)

Consent

In some circumstances, we may ask you for explicit consent to enable us to process your data. However, this will normally only be where there is no other legal basis for us to process this information. Where we rely on consent, you may withdraw your consent at any time.

Collecting workforce information

We collect personal information via staff contract forms (HCC job application, health declaration), employee personal details and Employee Self Service.

Workforce data is essential for the school’s / local authority’s operational use. 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.

Storing personal information

Sparsholt CE Primary School will keep your personal information stored securely. We hold workforce data in accordance with our retention schedule.

Data Description	Where stored	How long it is kept?
Personal Information	SIMS Cloud storage / hard copy	End of employment + 7 yrs
Interview notes & recruitment records	Soft / Hard copy - administration	Unsuccessful- date of interview + 1 yr Successful – end of employment + 7 yrs
DBS checks	Hard copy - administration	Date of check + 6 months
Performance management	Hard copy	Current + 6 years
Timesheets	SIMS Cloud storage	Current + 6 years
Absence / sickness	Email electronic storage	Current yr + 6 yrs
Maternity / Paternity records		
Child protection files	Hard copy CPoms Cloud Storage	Retain whilst pupil in school then securely transfer to new school
Pension & Retirement	SIMS Cloud storage / hard copy	End of employment + 7 yrs
Disciplinary	Local electronic / Hard copy	Date of event + 1 yr
Activity consent forms	Hard copy	Date of event + 1 yr

Who we share workforce information with

We routinely share some workforce information with:

- The local authority
- the Department for Education (DfE)

Why we share school workforce information

We do not share information about workforce members with anyone without consent unless the law and our policies allow us to do so.

We and the Local Authority share information about school employees with the Department for Education on a statutory basis. This data sharing informs departmental policy on pay and the monitoring of the effectiveness and diversity of the school workforce, links to school funding and expenditure and supports long term research and monitoring of educational policy.

We are required to share information about our school employees with our local authority under regulation 5 of the Education (Supply of Information about the School Workforce) (No 2) (England) Regulations 2007 (as amended). Our Local Authority has a duty to provide the Department of Education with the information about our school employees under regulation 6 of the Education (Supply of Information about the School Workforce) (No 2) (England) Regulations 2007

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 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.

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

We occasionally share workforce information with suppliers (for example a payroll provider, professional HR advisers or occupational health providers) to enable the school to receive services that support our legal obligations to staff (e.g. to pay them) or for the purposes of fulfilling public tasks (e.g. running and staffing a school).

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 Miss Carol Shepcock, Sparsholt CE primary School, woodman Lane, Sparsholt SO21 2NR, email: dpo@sparsholt.hants.sch.uk

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
- a right to seek redress, either through the ICO, or through the courts

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/>

Contact

If you would like to discuss anything in this privacy notice, please contact: Carol Shepbeck, Sparsholt C of E Primary School, Woodman Lane, Sparsholt SO21 2NR email dpo@sparsholt.hants.sch.uk