



Carlisle & Hampton Hill Federation



PRIVACY NOTICE STAFF

This policy was reviewed:	November 2023
This policy was ratified by Full Governing Body (if applicable):	Not applicable
This policy will be reviewed again:	November 2024
Governor committee responsibility:	A & F
Statutory Policy:	No

Contents

1. Introduction	3
2. The personal data we hold	3
3. Why we use this data.....	4
4. Our lawful basis for using this data.....	6
5. Collecting workforce information	7
6. Who we share your data with	8
7. How we store this data	8
8. Your rights	9
9. Complaints.....	9
10. Contact us.....	10

1. Introduction

Under UK data protection law, individuals have a right to be informed about how we use 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 **the people we employ, or otherwise engage, to work at our schools.**

It is intended for the school workforce (including school governors, volunteers and contract staff) and we encourage all to read it. We have produced separate privacy notices for pupils and parents/carers.

Our aim is to always provide clear information about the personal information we are using and why we are using it. If anything is unclear, or if you have any concerns then please contact the Data Protection Officer (details below).

This is an 'overarching' privacy notice and it applies generally to most of the personal information that we collect and use about our workforce. Unless there is a lawful reason not to do so, we will also provide more specific privacy information at the point at which we collect or use personal information that is not captured by this notice.

While much of the personal information that we collect is mandatory (i.e. it must be provided so that we can manage the employment relationship with you and our schools), some of it may be requested on a voluntary basis. Where this is the case, we will request consent at the point we collect the information. We will explain to you whether there is a requirement to provide certain information to us, or whether you have a choice in doing so.

We;

- Carlisle Infant School, Broad Lane, Hampton, TW12 3AJ, 020 8979 2770
- Hampton Hill Junior School, (HHJS) St James's Avenue, Hampton Hill, TW12 1HW, 020 8979 3019

are the 'data controller' for the purposes of UK data protection law.

- Our Data Protection Officer is Satswana

Suite G12 Ferneberga House
Alexandra Road,
Farnborough,
Hampshire,
GU14 6DQ

01252 759177

info@satswana.com

2. The personal data we hold

We process personal data relating to those we employ, or otherwise engage to work at our school in order to manage the working relationship and to run the school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details (such as name, address and telephone numbers)
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information

- 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, application form 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
- Information relating to disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence
- Photographs
- Data about your use of the school's information and communications system

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Medical information (any health conditions that we need to be aware of)
- Sickness records
- Photographs and CCTV images (HHJS only) captured in school.
- Characteristics (such as ethnicity, language)
- Trade union membership

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences. Where we process criminal convictions, for example as part of a job application or statutory requirement we also have to identify an additional ground for processing. Usually this will either be either on the basis of our legal obligations in relation to safeguarding, preventing fraud or with your consent.

We may also hold data about you that we have received from other organisations, including other schools and social services and the Disclosure and Barring Service in respect of criminal offence data.

3. Why we use this data

We use the data listed above to:

- a) Enable you to be paid and administer pension and other benefits
- b) Maintain accurate workforce records including emergency contact details and records of contractual and statutory rights
- c) Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- d) Operate and keep a record of absence management and other types of leave including maternity and paternity and parental leave
- e) Obtain occupational health advice and ensure we are meeting obligations under health and safety law
- f) Support effective performance management including training records
- g) Disciplinary and grievance processes
- h) Inform our recruitment and retention policies
- i) Allow better financial modelling and planning
- j) Enable ethnicity and disability monitoring and promote equality in the workplace
- k) Improve the management of workforce data across the sector
- l) Provide references

- m) Respond to and defend legal claims
- n) Support the work of the School Teachers' Review Body

3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

3.2 Use of your personal data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

4. Our lawful basis for using this data

Data Protection law requires us to have a lawful reason ('lawful basis') for processing the personal data we use. These reasons are listed under Article 6 of the 'General Data Protection Regulation' (GDPR). Our lawful basis for processing will be explained at the point at which we collect personal information unless there is a lawful reason not to do so (for example where it is for the prevention or detection of crime).

Carlisle Infant School and Hampton Hill Junior School process a wide range of personal data for a variety of purposes. The lawful bases we rely on will therefore vary. However, generally, the lawful bases we mainly use in relation to staff are:

- **To fulfil a contract we have entered into with you:** For example we need to collect and use your personal information to fulfil the terms of the employment contract we have with you including to be able to pay you and to administer benefits and pensions.
- **We need to comply with the law (we have a legal obligation):** For example we collect and use personal data under legal and statutory obligations within the Keeping Children Safe in Education (KCSIE) statutory guidelines. We are required to check employees' suitability to work with children, their entitlement to work in the UK and to comply with health and safety laws.
- **We need to carry out a task in the public interest:** For example, the collection and use of workforce information is necessary for us to perform our role as a school and to deliver our public task of providing education to our pupils.

Less commonly, we may also need to use personal information where:

- You have given us your consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests). This relates to life and death situations.
- It is in ours or a third party's legitimate interests to process the data. Where this is the case we will ensure that we have considered whether or not our legitimate interests are overridden by your rights and freedoms as the worker or employee.

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 go about withdrawing consent if you wish to do so. We will then cease this aspect of processing, unless another lawful basis applies.

Some of the reasons that we use for collecting and using information may overlap and there may be several grounds allowing us to use personal data. There are also other lawful bases that may apply and this will be made clear wherever possible.

Our lawful basis for processing will be explained at the point at which we collect personal information unless there is a lawful reason not to do so (for example where it is for the prevention or detection of crime).

4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

5. Collecting workforce information

The reasons that we collect and use personal information enables us to manage our workforce and help us to run the school. While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

We collect and use information about you in a variety of ways including through the recruitment process, information obtained through identity documents, from correspondence with you or through interviews, meetings or other assessments while you are working with us.

In many cases we will collect information about you from third parties such as references provided by former employers and information from employment checks or criminal records checks permitted by law.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals

6. Who we share your data with

Information about our workforce will not be shared with any third party without consent unless the law permits this. Where it is legally required or is otherwise necessary (and it complies with data protection law) personal information may be shared with the relevant local authority – to meet our legal obligations to share certain information such as safeguarding concerns or with the Department for Education (DfE). The DfE processes personal data relating to those employed by schools (including all academies and free schools and all special schools including pupil referral units). To find out more about the data collection requirements that are placed upon us by the DfE including the data that we share with them go to: <https://www.gov.uk/education/data-collection-and-censuses-forschools>

Where it is legally required or necessary (and it complies with UK data protection law), we may share personal information about you with (but not limited to):

- › The Department for Education
- › Our local authority – London Borough of Richmond – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- › Government departments or agencies, schools may be required to pass on data in order to help the government monitor the educational system and enforce laws relating to education
- › Our regulator, e.g. Ofsted
- › Suppliers and service providers, to enable them to provide the service we have contracted them for, e.g. payroll
- › Financial organisations
- › Trade unions and associations
- › Health authorities, as obligated under health legislation
- › Health and social welfare organisations
- › Professional advisers and consultants
- › Police forces, courts, tribunals
- › Professional bodies

6.1 Transferring data internationally

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law and ensure that we have sufficient safeguards in place.

7. How we store this data

We keep personal information about you while you work at our schools. We may also keep it beyond your employment at our schools if this is necessary. This will be done in accordance with the guidance provided in the [Information Management Society's toolkit for schools](#).

Personal data is stored in line with our data protection policy in a range of different places including in your personnel file and in IT systems including the schools' email system. 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 purposes relevant to your employment. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

8. Your rights

8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that apply):

- › 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
- › Give you a copy of the information in an intelligible format within one month, unless an extension is necessary on the grounds of the complexity of the request

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances. If you would like to make a request, please contact the Data Protection Officer (see 'Contact us' below).

8.2 Your other rights regarding your data

Under UK data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- › Object to our use of your personal data
- › Prevent your data being used to send direct marketing
- › Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- › In certain circumstances, have inaccurate personal data corrected
- › In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- › Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- › In certain circumstances, be notified of a data breach
- › Make a complaint to the Information Commissioner's Office
- › Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact the Data Protection Officer (see 'Contact us' below).

9. 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 us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

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

10. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer:

Our Data Protection Officer is Sataswana

Suite G12 Ferneberga House
Alexandra Road,
Farnborough,
Hampshire,
GU14 6DQ

01252 759177

info@satswana.com