

Privacy Notice for Workforce

Vale School will always adopt the West Sussex County Council Model documents as appropriate.

Parents and Staff are advised to check the West Sussex County Council website (www.westsussex.gov.uk) in case of any amendments since the date of adoption.

We will endeavour to ensure we adopt the updated versions as soon as practical.

We would welcome Parents or Staff to notify us if there have been any changes.

West Sussex County Council - Version Jan 2018

Privacy Notice

The School Workforce: those employed to teach, or otherwise engaged to work at, a school or a local authority

The EU General Data Protection Regulation (GDPR)

On the 25th May 2018 the General Data Protection Regulation (GDPR) will be applicable and the current Data Protection Act (DPA) will be updated by a new Act giving effect to its provisions. Before that time the DPA will continue to apply.

Data Controller

Vale School complies with the GDPR and is registered as a 'Data Controller' with the Information Commissioner's Office (Reg. No. Z8580202).

The Data Protection Officer (DPO) for the School is Mrs Carpenter.

We ensure that your personal data is processed fairly and lawfully, is accurate, is kept secure and is retained for no longer than is necessary.

The Legal Basis for Processing Personal Data

The main reason that the school processes personal data is because it is necessary in order to comply with the schools legal obligations (including the Education Act 1996) and to enable it to perform tasks carried out in the public interest,

The school may also process personal data if at least one of the following applies:

- in order to protect the vital interests of an individual
- there is explicit consent.
- to comply with the school's legal obligations in the field of employment, social security and social protection law
- for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity
- for reasons of public interest in the area of public health
- for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, based on law, or pursuant to contract with a health professional
- for reasons of substantial public interest, based on law, which is proportionate in the circumstances and which has provides measures to safeguard the fundamental rights and the interests of the data subject;

The categories of school workforce information that we collect, process, hold and share include:

- personal information (such as name, address, date of birth, marital status, gender, employee or teacher number, national insurance number, next of kin details, photographs)
- financial information (such as bank, account details, tax information, pension obligations, childcare voucher scheme details, business interests)
- special categories of data including characteristics information such as gender, age, ethnic group
- contract information (such as start dates, hours worked, post, roles, salary)

information, pension and benefits)

- employment history (such as previous employers, continuous service, references)
- work absence information (such as number of absences and reasons, annual leave)
- medical information (such as medical conditions, emergency medication, medical and occupational health reports)
- safeguarding check details (such as DBS status, details regarding convictions of third parties within the household under disqualification by association)
- performance (such as performance management, capability and disciplinary matters)
- qualifications and recruitment information (right to work documentation, references, application process information)
- information relevant to the School Work Force Census and absence information.
- vehicle details (such as insurance policy, driving licence details, MOT)

Why we collect and use staff information

We process personal data relating to those we employ to work at, or otherwise engage to work at our School for:

- employment purposes and facilitate safe recruitment as part of our safeguarding obligations
- enable the development of a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- to assist in the running of the School
- to enable individuals to be paid
- to support professional development of staff
- to support staff wellbeing

The collection of this information will benefit both national and local users by:

- improving the management of workforce data across the sector
- enabling development of a comprehensive picture of the workforce and how it is deployed
- informing the development of recruitment and retention policies
- allowing better financial modelling and planning
- enabling ethnicity and disability monitoring; and
- supporting the work of the School Teachers' Review Body
- protecting vulnerable individuals;
- the prevention and detection of crime

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

Who we share this information with

We will not give information about you to anyone outside the School without your consent unless the law allows or requires us to.

We routinely share this information with:

- our local authority
- the Department for Education (DfE)
- Ofsted
- Schools Advisory Service

- Atlantic Data (DBS service)
- Website
- Yellow (School Photographer)
- ParentMail
- School Cloud Systems (Parents Evening System)
- School Tour Operators / Off-site Educational Centres
- Google G Suite
- Other schools
- Educational software/resource providers
 - eg Sumdog, TT Rockstars, Language Nut, Twinkl, MyMaths, Oxford Owl, Target Tracker, Evolve
- IT service providers
- Governing Body
- School Fund auditors
- External security monitoring company - Kestrel Alarms
- Cleaning contractors - Acorn

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.

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.

As a maintained school, a variety of supporting services are provided through the local authority. It is necessary to share some information with the following third party organisations who operate these services under the LA contracts:

- Health Management - occupation health services
- Atlantic Data - DBS disclosure services
- Lloyds Bank - LA banking services provider

Department for Education (DfE)

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.

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>

The school uses the following external service providers to enable the school to provide a combination of both statutory and non-statutory services for the school community. Appropriate data will be shared with these providers to enable them to fulfill their obligations to the school.

Ofsted

Ofsted is the Office for Standards in Education, Children's Services and Skills. It reports directly to Parliament and is both independent and impartial. By law it must inspect schools with the aim of promoting improvement and to hold schools to account. The school will provide information as requested by Ofsted.

Schools Advisory Service

We share personal data with Schools Advisory Service on an operational basis as our provider of sickness and absence insurance. The data is used for the operation and management of the policy, and to provide wellbeing services to staff.

Yellow (School Photographer)

We share the names of class teachers with the school photographer for the purpose of managing and production of the school photographs.

ParentMail

We share name, e-mail address and mobile number for staff and governors with ParentMail in order to allow them to operate the communication system on behalf of the school.

School Cloud Systems (Parents Evening System)

We share name and school e-mail address for teachers with School Cloud Systems in order to allow them to operate the parents evening and event booking system on behalf of the school.

Google G Suite

We use G Suite as the school's main operational document processing and storage system, and e-mail service. We share names and e-mail addresses with Google for the provision of user accounts for the school's G Suite services. Google also act as a Data Processor for the school in respect of the school's data stored within the service. This is controlled by the school as the Data Controller, under the special G Suite for Education terms.

Educational software/resource providers eg Sumdog, TT Rockstars, Language Nut, Twinkl, MyMaths, Oxford Owl, Target Tracker, Evolve, Microsoft Office 365

We share teaching staff and certain support staff names and e-mail addresses to allow access to the services provided for the school.

School Fund Auditors

Appointed companies will have access to the financial records of the School Fund accounts which may include staff names in respect of financial transactions.

External Security Monitoring Company - Kestrel Alarms

Personal and contact details of certain members of staff will be shared with our external security system monitoring company to enable them to notify relevant staff in the event of a security alarm activation.

Cleaning Contractors - Acorn

Personal and contact details of certain members of staff will be shared with our cleaning contractors for the management of cleaning services, contact in case of school closure etc.

Confidential Waste Disposal Contractors

The school may use external providers for the disposal of paper documentation containing personal information at the end of the relevant retention periods. These providers may take the documents away from the school in secure containers for off-site destruction.

Retention Periods

Personal data will not be retained by the School for longer than necessary in relation to the purposes for which they were collected.

Information will be held in accordance with the Information and Records Management Society Tool Kit for Schools.

<https://irms.site-ym.com/page/SchoolsToolkit>

CCTV

The school operates CCTV on the school site as it is considered necessary to protect pupils' safety and/or the school's property

Rights

You have the right to:

1. be informed of data processing (which is covered by this Privacy Notice)
2. access information (also known as a Subject Access Request)
3. have inaccuracies corrected
4. have information erased
5. restrict processing
6. data portability (this is unlikely to be relevant to schools)
7. intervention in respect of automated decision making (automated decision making is rarely operated within schools)
8. Withdraw consent (see below)
9. Complain to the Information Commissioner's Office (See below)

To exercise any of these rights please contact the DPO

Withdrawal of Consent

The lawful basis upon which the School process personal data is that it is necessary in order to comply with the Schools legal obligations and to enable it to perform tasks carried out in the public interest.

Where the School process personal data solely on the basis that you have consented to the processing, you will have the right to withdraw that consent.

Complaints to ICO

If you are unhappy with the way your request has been handled, you may wish to ask for a review of our decision by contacting the DPO.

If you are not content with the outcome of the internal review, you may apply directly to the Information Commissioner for a decision. Generally, the ICO cannot make a decision unless you have exhausted our internal review procedure. The Information Commissioner can be contacted at:

The Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire
SK9 5AF.