



The Stoke Poges School

Privacy Notice - how we use workforce information

We, Stoke Poges School, process personal data relating to those we employ to work at, or otherwise engage to work at, our school / Local Authority. This is for employment purposes to assist in the running of the school and/or to enable individuals to be paid.

The categories of school information that we process include:

- personal information (such as name, employee or teacher number, national insurance number, contact details, address history, proof of identity, next of kin, emergency numbers and car registration)
- characteristics information (such as gender, date of birth, ethnic group, disabilities, language)
- contract information (such as start date, hours worked, post, roles and salary information, pension, annual leave, bank details, details of CPD)
- work absence information (such as number of absences and reasons) and relevant medical information
- recruitment information including copies of right to work, DBS status, references, other information included in a CV or cover letter as part of the application process
- qualifications (and, where relevant, subjects taught)
- performance information, outcomes of disciplinary and/or grievance procedure
- photographs for identity management
- data about your use of the school's information and communications systems

Why we collect and use workforce information

We use workforce data to:

- a) enable the development of a comprehensive picture of the workforce and how it is deployed
- b) inform the development of recruitment and retention policies
- c) enable individuals to be paid
- d) facilitate safe recruitment
- e) support effective performance management
- f) allow better financial modelling and planning
- g) enable ethnicity and disability monitoring

The lawful basis on which we process this information

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

- Article 6.1.e states that the use of personal data is justified if 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'. In this instance, the requirement for the school to deliver education under the Education Act (1996) requires us to collect information to deliver this service.
- Article 9 covers the use of sensitive personal information (this includes health and social care information). This is justified either by article 9.2.a (consent from the data subject) or article 9.2.e (processing is necessary 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).

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

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.

Collecting workforce information

We collect personal information via applications forms, personal details forms, performance management forms and leave of absence request forms.

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 workforce information

We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please visit the policy section on our website. We create and maintain an employment file for each staff member. We also store some information electronically. Personal information that is no longer needed, or has become inaccurate or out of date, is disposed of securely. For example, we will shred paper-based records, and override or delete electronic files. We may also use an outside company to safely dispose of electronic records.

Who we share workforce information with

We routinely share this information with:

- our local authority
- the Department for Education (DfE)
- Ofsted to support its assessment of the school's performance
- essential school service providers to enable them to provide the service we have contracted them for

- our auditors to support statutory audit processes
- Security organisations – where we are legally obliged to share information or to maintain the welfare of pupils and staff
- Health organisations
- Professional advisers and consultants to support the provision of educational services
- Curriculum online service providers so you may access resources on online
- The Charity Commission – to share information on charity trustees
- Police forces, courts, tribunals - if a situation arises where a criminal investigation is being carried out we may have to forward information on to the police to aid their investigation. We will pass information onto courts as and when it is ordered

Why we share school workforce information

We do not share information about our 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.

Department for Education

The Department for Education (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.

All data is transferred securely and held by DfE under a combination of software and hardware controls which meet the current [government security policy framework](#).

For more information, please see 'How Government uses your data' section. For privacy information on the data the Department for Education (DfE) collects and uses, please see: <https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers>.

Requesting access to your personal data

The UK-GDPR gives you certain rights about how your information is collected and used. To make a request for your personal information, contact the Data Protection Lead via office@stokepoges.school

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request, data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.

- the right to ask us to delete your personal information – this is called ‘right to erasure’
- the right to ask us to stop using your information – this is called ‘right to restriction of processing’.
- the ‘right to object to processing’ of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to [complain to the Information Commissioner](#) if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don’t have the right to object, but you have the right to withdraw consent.

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/>

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the ‘How Government uses your data’ section of this notice

Withdrawal of consent and the right to lodge a complaint

Where we are processing your 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 the DP lead via office@stokepoges.school

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 September 2024.

Contact

If you would like to discuss anything in this privacy notice, please contact: our Data Protection Officer at dpo@turniton.co.uk or the Head Teacher at office@stokepoges.school

How Government uses your data

The workforce data that we lawfully share with the Department for Education (DfE) through data collections:

- informs the Department for Education (DfE) 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 (DfE) 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 for Education (DfE)

The Department for Education (DfE) 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 for Education (DfE) will only share your personal data where it is lawful, secure and ethical to do so and 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 the Department for Education (DfE) releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of public benefit, proportionality, legal underpinning and strict information security standards.

For more information about the Department for Education's (DfE) data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the Department for Education (DfE) has provided information, (and for which project) please visit the following website:

<https://www.gov.uk/government/publications/dfe-external-data-shares>

How to find out what personal information the DfE hold about you

Under the terms of UK GDPR, you're entitled to ask the Department for Education (DfE):

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

or

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>