



Workforce Privacy Policy

Date: May 2024

Review date: May 2025

Approved by Advisory Board: May 2024

Linked with other policies:

- Data Protection
- Disciplinary Procedure
- Equality Statement
- Freedom of Information
- Health and Safety
- Privacy Notice

Signed:

A handwritten signature in blue ink that reads "S. Day" followed by a horizontal line.

Version Control

Version	Date of review/change(s)	Page and paragraphs affected	Summary of update
1	May 2022	Page 4 – How we Store This Data	Removal of named payroll software
		P5 Data sharing point 5	Removed as not applicable: ‘and the Church of England Diocese Education Office for SIAMS Purposes’
		Page 5 – Data Sharing	Named payroll software changed to Sage 50 Cloud Payroll Addition of Lovewell Blake Addition of Google for g suite
		Page 6 – Contact us	Change of name of Data Protection Officer
		Page 6	Removed address of ICO contact for complaints
2	May 2023	P3 Personal data we hold and P4 How we store	‘Marital status’ removed
		P5 Data sharing	Sage 50 Payroll changed to Xero. Added National Online Safety and CPOMS StaffSafe to the list of service providers
		P6 contact	Added: ‘Representative’ to DPO
3	May 2024	P3	DPO now Data Protection Education and Representative of the DPO is Tracey Buchan
		P5 list of Service Providers	Pupil Asset changed to management information systems ‘accounts’ added to Xero
		P6-7	Added: Filtering and Monitoring

Workforce Privacy Policy (How we use workforce information)

Under data protection law, individuals have a right to be informed about how the school uses 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 individuals we employ, or otherwise engage, to work at our school.

We, All Saints School, are the 'data controller' for the purposes of data protection law.

Our data protection officer from Data Protection Education and the DPO representative in school is Tracey Buchan

The personal data we hold

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

- Contact details
- Date of birth 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
- Ethnicity and religion
- Recruitment information, including copies of right to work documentation, references and other information included in an application form 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
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copies of ID documents (eg birth certificate, driving license, passport)
- Photographs
- Educational and personal email address
- Data about your use of the school's information and communications system
- Information about business and pecuniary interests

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Health, including any medical conditions, and sickness records

Why we use this data

The purpose of processing this data is to help us run the school, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards students
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning

- Enable equalities monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body

Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

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

- You have given us consent to use it in a certain way

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.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

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.

How we store this data

Personal data is stored in line with our GDPR Retention and Destruction Policy.

We create and maintain an employment paper file. A limited amount of personal data is also held on the school's MIS which is only accessible by the Directors, Headteacher, School Secretary and Receptionist as they have AccessAdmin status. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our GDPR Retention and Destruction Policy. A copy can be found on our website. In accordance with the DfE's Keeping Children Safe in Education 2018 we also maintain a Single Central Record for all adults who have access to children of the school recording their name, address, date of birth and DBS (Disclosure and Barring Service) number and date. This is kept electronically on the school's server and only accessible by the Headteacher, SLTs and School Secretary.

As part of the school's payroll system, the names, addresses, dates of birth, email addresses, telephone numbers, National Insurance number, tax coding, payroll numbers and salaries of each member of staff are recorded on the school's electronic payroll system. The information is retained for six years in line with the school's finance retention policy.

Bank account details are stored securely on the company's online banking facility to facilitate payment of salaries.

Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about Headteacher performance and staff dismissals.
- The Department for Education to meet our legal obligations;
- Your family or representatives to carry out a task in the public interest;
- Educators and examining bodies to carry out a task in the public interest;
- Our regulator i.e. Ofsted to meet our legal obligations and perform an official task in the public task
- Service providers – to enable them to provide the service we have contracted them for, such as payroll, in order for us to meet our legal obligations and perform a task in the public interest.

The following service providers are used by the school:

- Management information systems – electronic personnel files including contact details, next of kin, address, and qualifications
- Xero – accounts, payroll and salary information
- The Peoples Pension – pension provider
- Lovewell Blake - accountant
- Norfolk Disclosure Service (Atlanta Data Ltd) – online Disclosure and Barring Service for Norfolk County Council
- High Speed Training – online training tool
- Tempest Photography – class photographs for which consent is sought
- National Online Safety – online training
- CPOMS Staff Safe – contact details, Disclosure and Barring/ Prohibition Checks, Section 128 checks (if applicable), Right To Work checks

- Professional advisers and consultants in order for us to perform a task in the public interest
- Police forces, courts, tribunals in order for us to perform a task in the public interest
- Professional bodies in order for us to perform a task in the public interest
- Microsoft Office 365 for the purposes of sending and receiving email communication, both internally and externally.
- Google for g suite

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Your rights

How to access personal information we hold about you

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- 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 form.

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 our data protection officer.

Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to 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, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

Use of your personal data for filtering and monitoring purposes

While within school premises, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers).

Our internet and online systems are used to support teaching and learning, pastoral and wellbeing, financial and personnel issues. To do this we have to be mindful that staff, pupils, volunteers, and visitors may access the internet to undertake tasks.

We have an obligation to put in place suitable Filtering and Monitoring systems, which apply to all school devices, whether used on site or off site. Filtering and Monitoring will also apply to personal devices that access our internet connection on the site.

Filtering is the safety measure designed to restrict and control the content which can be accessed by staff, pupils, volunteers, and visitors.

Monitoring concerns the review of user activity on the school's network to promote the safeguarding of staff, pupils, volunteers, and visitors.

Management of Data

We use third party systems to manage the Filtering and Monitoring obligations that are Department for Education requirements, as set out in Keeping Children Safe in Education and the wider safeguarding standards that are mandatory.

The records will be retained in line with the school's retention policy. However, there may be instances where elements need to be retained for a longer period if there are safeguarding concerns.

This data will be processed as part of a Public Task with a Legal Duty to implement the systems and procedures.

What do we do with the data?

The data will be reviewed internally by suitably appointed Safeguarding and IT professionals. There may be occasions when it is necessary to share material with third parties such as the police, social care or health professionals. Sometimes this can be done without any notification to the person or person who have been the source of the concerns.

If matters need to be raised with individuals this will be done according to our wider data protection, safeguarding and employee policies as is appropriate.

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.

To make a complaint, please contact our data protection officer.

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
- Live chat: <https://ico.org.uk/global/contact-us/>

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 representative:

Tracey Buchan - admin@allsaintslessingham.co.uk