St Paul's CE Primary School
Data Privacy Notice
School Workforce

If you would like to discuss anything in this privacy notice, please contact

Data Protection Officer: **Data Protection Education Ltd**

Telephone: 0800 0862018

Email: dpo@dataprotection.education

If you would like a copy of any documentation, please contact our school office: **admin@stpauls.brighton-hove.sch.uk**

We may need to update this privacy notice periodically. If you are reading a printed version of this document, we recommend that you check with our school office or on our website, www.stpaulsbrighton.co.uk, to ensure that you have the most up-to-date version. This version was produced in January 2025.

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Purpose of this document

St Paul's CE Primary School is a data controller and this document describes the workforce data that is collected and how it is processed. As a controller, we are responsible for deciding what data is collected and how it is processed.

Under the Data Protection Act 2018 and the UK GDPR, we must abide by the principle of transparency and the right of data subjects to be informed about how their data is processed.

This document provides such information. It will be updated occasionally and updates will be communicated to the relevant data subjects.

It is your duty to inform us of changes.

We are registered with the Information Commissioner's Office, registration number Z9943950.

The categories of school information that we collect and process include the following:

- personal information such as name, national insurance number, date of birth, marital status, address and contact details (home phone number, personal email address), emergency contact / next of kin, teacher number;
- characteristics information such as gender, age, nationality;
- special category data such as racial/ethnic group, religion, trade union membership (and payroll deductions made), sexual orientation (if raised in discrimination issues);
- health data such as occupational health referrals and associated data, pre-employment medicals, disabilities, dietary requirements, allergies, medications, access to work assessments and associated data;
- criminal record data (if it exists during pre-employment checks, including via the Disclosure and Barring Service), prohibition order check results, childcare disqualification check results, DBS number, right to work information (passport, visa, indefinite leave to remain);
- contractual and employment information (such as work history, start date, hours worked, post, roles, employee and teacher numbers and salary information);
- financial information such as bank details, salary, pension, statutory deductions;
- qualifications, training and skills (and, where relevant, subjects taught), safeguarding status, first aid qualifications;
- performance review data;
- disciplinary/grievance/complaint records;
- work absence information such as number of absences and reasons, medical certificates, return to work interviews;
- data collected during execution of duties;

- photographic and interactive media;
- other business interests;
- we record CCTV for the safety and security of everyone in the school.

This list is not exhaustive

Why we collect and use this information

We use school workforce data to:

- enable the development of a comprehensive picture of the workforce and how it is deployed;
- inform the development of recruitment and retention policies;
- enable individuals to be paid;
- to calculate pension payments and any other salary calculations (such as sick pay or maternity pay);
- facilitate safer recruitment;
- ensure effective performance management;
- support staff welfare and monitor staff absence;
- make claims from our Insurance Company for staff absence;
- monitor budget expenditure;
- fulfil our obligations regarding statutory returns and audits;
- fulfil our obligations under safeguarding and health and safety legislation; and
- undertake the workforce census, as required by the DfE.

The lawful basis on which we process this information

We collect and process school workforce information:

- under Article 6.1.g of the UK General Data Protection Regulation (UKGDPR) to perform our official function (public task);
- to carry out our duties as an employer under the terms of a contract (Art 6.1.c) and in carrying out obligations and exercising specific rights as the controller (Art 9.2.b);
- classed as Special Category data, e.g. race, ethnicity etc, under Article 9 of the General Data Protection Regulation (GDPR) to carry out tasks in the public interest;
- where it is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law;

- where it is carried out as a task in the public interest, such as equal opportunities monitoring, for child protection purposes or where otherwise authorised by law, such as Departmental Censuses as required in the Education Act 1996;
- under the terms of the contract of employment;
- during the recruitment process, background checks will be done, which may involve the collection of criminal convictions. We will process criminal conviction data as it is reported during employment/recruitment to assess the suitability of continued employment/recruitment; and
- where you have given us consent to do so.

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 contact us using the details on the front page of this document.

Our basis for processing special category data:

In addition, we will on occasion, need to process special category personal data, such as ethnicity, health, religion, trade union membership data, in accordance with rights or duties imposed by law in the public interest or by explicit consent, where required. For example:

- We collect sensitive data such as health and ethnicity to enable us to process the school workforce census and share information with the Department for Education (DfE), under section 5 of the Education Regulations 2007 and amendments.

For special category data (sensitive personal information) 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 data protection law:

- processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law insofar as it is authorised by domestic law or a collective agreement pursuant to domestic law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;
- processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity; or
- the assessment of an employee's health and capacity to work, subject to confidentiality safeguards.

Collecting this information

Workforce data is essential for the school's / local authority's operational use. 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 confirm whether you are required to provide certain school workforce information to us or if you have a choice in this.

Information will be collected during the application and recruitment process, from you or your agency (such as applications, new starter forms and contracts). Additional information may be requested from third-parties during the recruitment process, including agencies undertaking background checks and former employers.

We collect personal information during employment (such as change of personal details forms and other data collection forms, as well as reports made by other parties, which may be kept in your personnel file) as and when required.

CCTV recording and monitoring is in use on-site. Please see the organisational CCTV policy for further details.

Storing this 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 contact the school office.

Who do we share this information with

We routinely share this information with

- Our local authority;
- The Department for Education (DfE); and
- Third-party service providers (where a contract exists) in order to fulfil contractual obligations (such as payroll) or where a service is being used in the operations of the school (such as parent communication applications) See Appendix 1.

Only information required for the stated purpose is shared, and all third-parties are required to ensure appropriate technical and organisational measures are in place to secure your data.

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.

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 of educational attainment.

We are required to share information about our 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.

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

For more information, please see Appendix 2 'How Government uses your data'.

The Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- used lawfully, fairly and transparently;
- collected and used only for the specific, explicit and legitimate purpose they have been collected for and not for any other purposes;
- adequate and relevant and limited only to what is necessary;
- accurate and kept up to date;
- kept only as long as necessary; and
- kept securely, using appropriate technical and/or organisation measures.

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 our School Business Manager or our Data Protection Officer using the contact details on the front of this notice.

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;
- right to data portability;
- 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;

The Data Protection Officer (DPO) is in a position to ensure your rights are supported. To contact the DPO or to make a right of access request (subject access request) use the contact details on the front of this notice.

Concerns about how your personal data is handled

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 using the contact information on the first page of this document.

The Data Protection Officer (DPO) is in a position to ensure your rights are supported. To contact the DPO use the contact details on the front of this Privacy Notice.

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.

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.

Appendix 1: Suppliers that we have contracted with to provide educational services and personnel systems and those related to the operations of the school

- Arbor (Management Information System where all pupil records are held). Basic staff data held for log-in purposes and connection with other third-party providers
- Bromcom Personnel (management information system where all staff data records are held)
- Bromcom Finance (accounting system, including supplier information, staff log-ins, contract and pay information)
- ClassDoJo (messaging and communication)
- CPOMS (child protection and safeguarding management system)
- Data Protection Education (data protection training records)
- Edukey (learning plan/provision map writer. SEN data/interventions/support)
- Google Classroom (remote learning)
- Juniper - Target Tracker (assessment resources)
- New Era Education - School Ping (communicating with Families and Staff)
- ParentPay (collection of payments for school meals and school events)
- School Photographer (official staff image for MIS)
- SchoolsUK (staff maternity and absence insurance)
- Sparta Health (occupational health)
- Sign in App (system for staff and visitors to sign in on arrival and out on departure)
- Studybugs (recording pupil attendance);
- The National College (staff training)
- Third Party Service Providers to support teaching & Learning (e.g. Maths Circle -Times Table Rock Stars, Twinkl, Clicker, Education Shed, White Rose Maths, Language Angels, PE Hub, PlanBee, Rocket Phonics, Purple Mash, Tapestry,)

Appendix 2: 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; and
- 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; and
- providing information, advice or guidance.

The Department for Education (DfE) 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

- 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.

How to find out what personal information the Department for Education (DfE) hold about you

Under the terms of the Data Protection Act 2018, 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; and
- 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 which is published at the address below:

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

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