



Newport Infant School and Nursery

Privacy Notice - Staff Workforce Use of Your Personal Data

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Policy Lead	Chris Pierce - Headteacher
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1. Introduction

Under data protection law, individuals have a right to be informed about how our 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, Newport Infant School and Nursery, Granville Avenue, Newport, TF10 7DX, Telephone No: 01925386610 are the 'data controller' for the purposes of data protection law.

Our data protection officer is Judicium. (see 'Contact us' below).

2. The personal data we hold

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, 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 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
- Employment Details
- Information about business and pecuniary interests

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:

- Any health conditions you have that we need to be aware of
- Race, ethnicity, religious beliefs
- Trade Union Memberships
- Sickness records
- Information about disability and access requirements
- Photographs captured in school

We may also hold data about you that we have received from other organisations, including other schools, 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:

- Enable you to be paid
- Facilitate safer recruitment, as part of our safeguarding obligations towards pupils
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Undertake equalities monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' pay review
- Ensure that appropriate access arrangements can be provided for staff who require them

3.1 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

This section contains information about the legal basis that we are relying on when handling your personal information.

4.1 Public interests

This means that the processing of your personal data is necessary for public interests. The School relies on public interests for most of the ways in which it uses your personal information.

We only collect and use personal data when the law allows us to. Most commonly we use it when 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:

- We need to protect your vital interests (or someone else's interests)
- We have legitimate interests in processing data – for example:.
- You have applied for another position and references are required as part of safer recruitment
- Your marital status has changed and we are obliged to inform government office about this.

If you object to us using your personal information where we are relying on our public interests as explained above please speak to the Headteacher.

4.2 Legal obligation

Where the School needs to use your personal information in order to comply with a legal obligation, for example to report a concern about safeguarding, we may also have to disclose your personal information to third parties such as the courts, the local authority or the police where legally obliged to do so.

4.3 Legitimate interest

Personal data may be processed on the basis that the school has a legitimate interest in processing that data, provided that such legitimate interest is not overridden by your rights or freedoms.

The School must also comply with an additional condition where it processes special categories of personal information. These special categories include: personal information revealing racial or ethnic origin, political opinions, religious or philosophical

beliefs, genetic information, biometric information, health information, and information about sex life or orientation.

4.4 Vital interests

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

4.5 Legal claims

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

4.6 Collecting Personal Information

We may ask for your consent to use your personal information in certain ways. If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your personal information before you withdraw your consent remains valid. Please speak to the Headteacher if you would like to withdraw any consent given.

4.7 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 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 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 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 this data

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.

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

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

6. How we store this data

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 directly relevant to your employment. The staff files are kept within a locked cupboard in a secure room (the school office). You are able to have access to your file at any time to ensure that all information about you is up to date.

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. Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our Record Retention and Safe Disposal Policy which currently states that we will keep it for two years for reasons such as: fulfilling a reference request.

What we store	How/Where it is stored
Personnel Files	Hard copies are kept securely within the school office in a locked cupboard. You can request to see your personnel file at anytime through the Headteacher or School Business Manager.
Performance Management Documentation	Stored on the school network drive and a hard copy is in the folder in the Headteacher's office.
Attendance Information	Sickness and other absence is reported by the School Business Manager on "my view". You can request to have a report of your attendance information through the Headteacher or School Business Manager.

7. Who we share data with

We do not share information about you with any third party without 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 your child 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 as well as payroll
- The Department for Education or other agencies- to meet our legal obligations to share information linked to performance data.
- Your family or representatives- to carry out our public task in the event of an emergency
- Other staff members- to carry out our public tasks, for example having access to your school email address so that information can be shared effectively
- Our regulator Ofsted, in order to comply with our public task
- Suppliers and service providers - (a list of our current suppliers and service providers can be found below)
- Central and local government to complete the legal obligation for things such as the workforce census
- Auditors- coming under a legal obligation and may ask about financial information related to schools.
- Survey and research organisations- to meet our legal obligation in relation to 'freedom of information' requests

- Trade unions and associations- to carry out our public task in light of any key discussions within school linked to disciplinary/capability procedures or for events such as redundancy.
- Security organisations- in order to keep our school secure and under the lawful basis of public task, we pass on certain staff member information so that they can be contacted if necessary (such as the caretaker).
- Health and social welfare organisations to carry out our public task in line with our attendance management policy with organisations such as occupational health
- Police forces, courts, tribunals- to meet our legal obligations to share certain information with it, such as safeguarding concerns or to carry out our public task in relation to a tribunal.
- Employment and recruitment agencies- to meet the public task of supplying requested references.
- The governors- to carry out our public task within the school and remain accountable to them for finance and personnel issues.

Suppliers and Service Providers:

WEDUC - This is a database for the purpose of communication via email/text/forms to parents/staff and for on-line payments. Parents/Staff have their own log-in and make their own changes to their personal data and for payment transactions. Access is password protected and the organisational management is restricted to relevant staff.

InVentry - This is a database that allows us to collate information about staff into the school for safeguarding purposes and daily staff attendance. Access to the management system is password protected and restricted to relevant staff.

Juniper Horizons -A management information system used to record some personal data related to staff although mainly for pupil data. Access is password protected and restricted to relevant staff.

The Key - This is a database for Senior Leadership support information. Access is password protected and restricted to relevant staff.

7.1 Transferring data internationally

Where we transfer your personal data to a country or territory outside the UK. For example, we will do so in accordance with data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements.

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 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 us (see 'Contact us' below).

8.2 Your other rights regarding your data

Under 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
- 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 us (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:

- Judicium - dataservices@judicium.com or 020 3326 9174

However, our data protection lead has day-to-day responsibility for data protection issues in our school.

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice,

please contact:

- Chris Pierce a2074@telford.gov.uk or 01925386610