

Privacy Notice (How We Use School Workforce Information)

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

- Personal information (such as name, employee or teacher number, national insurance number, date of birth, addresses);
- Special categories of data including characteristics and equalities information such as gender, age, ethnic group, disability, pregnancy/maternity, marriage/civil partnership, biometrics;
- Criminal convictions and cautions;
- Medical Information;
- Contract information (such as start dates, hours worked, post, roles and salary information);
- Work absence information (such as number of absences and reasons);
- Qualifications, examinations, skills, experience and career history (and, where relevant, subjects taught);
- Emergency contacts;
- Information regarding employment processes and procedures such as ill health, grievance, capability, discipline;
- Payroll information including bank account details, P45's, pension history, NI number, tax code, Date of marriage, salary sacrifice benefits, official deductions e.g. court orders, jury service, pension contributions, overtime, expenses, maternity and other family related absences;
- Health and safety information including personal details, details of accidents/incidents leading to injuries, details of any first aid treatments;
- Training information including courses completed and dates;
- Photography, video and CCTV.

Why We Collect and Use This Information

We use school workforce data to:

- To enable the development of a comprehensive picture of the workforce and how it is deployed;
- To assess applicants for shortlisting and appointment and to determine suitability for employment;
- To communicate with employees;
- To respond to employment queries and record employment history;
- To inform the development of recruitment and retention policies;
- To enable individuals to be paid;
- To enable processing of salary and other payments including payments for absences;
- To calculate and process statutory and voluntary deductions from pay;
- For pension enrollment and contributions;
- To manage employees through the employee lifecycle, application, appointment, probation, transfers, capability, disciplinary, absence, restructuring, salary changes, retirement, termination etc.;
- To compile Equalities data for census returns and profile of the organisations;
- To comply with statutory requirements for reporting and returns;
- To assess applications for specific benefits e.g. childcare vouchers;
- To confirm identity and right to work;
- To carry out workforce monitoring and statistical analysis including statutory returns;
- To complete Performance management process';
- To process information on accidents and incidents;
- To analyse and manage attendance
- To compile CPD records;
- To comply with statutory requirements for auditing of school finances including payroll, Teacher pension scheme;
- To comply with safeguarding of students and security of the site.

The Lawful Basis on Which We Process This Information

We collect and use information under the following lawful basis:

Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law;

Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract;

Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations);

Vital interests: the processing is necessary to protect someone's life;

Consent: the individual has given clear consent for you to process their personal data for a specific purpose.

Cox Green School must also comply with an additional condition where it processes special categories of personal information. These special categories include: racial or ethnic origin, religious or philosophical beliefs, health information, information, biometric information, data relating to criminal offences.

When processing special category data, set out in Article 9 of the Data Protection Act 2018, as well as one of the lawful basis for processing, we must ensure that a condition for processing from the following list applies:

Consent: explicit consent has been given to the processing of those personal data for one or more specified purposes;

Carrying out obligations and exercising specific rights: 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;

Vital Interests: processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;

Legitimate activities: processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects.

Collecting This Information

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.

We collect information from you via:

- Job Applications submitted online, by email or post in electronic or hard copy;
- Documents to confirm employment references, qualifications, right to work etc electronic and hard copy;
- HR forms complete by new and current employees, P45's, bank details, pension history – by email or post in electronic and hard copy;
- Documents from HMRC, HM Courts and Tribunal Service, Contributions agency by email or post in electronic and hard copy;
- Payroll information provided to our payroll provider RBWM by email or post in electronic and hard copy;
- Employment agencies containing employee information via email or post in electronic and hard copy;
- DBS application processing on line or hard copy;
- Management of employment processes; emails, letters, notes of interviews and meetings, reports, union representation both electronic and hard copy;
- Occupational Health medical assessments and referrals; on line and hard copy;
- On line systems supplied by 3rd parties delivering employee benefits such as Sedexo child care vouchers;
- Accident and incident reporting forms electronic and hard copy.

Storing This Information

We hold staff data for the following retention periods:

Data Set	Retention
Unsuccessful job candidates	Date of appointment of successful candidate + 6 months
Records leading up to the appointment of a new Headteacher	Date of appointment + 6 years
Records leading up to the appointment of new member of staff – successful candidate	All relevant information is added to the staff HR file – see below
Staff HR file	Year of termination of employment + 6 years
Pre- employment vetting information – DBS checks	The school does not keep copies of DBS certificates. If copies are made for any reason they are not retained for more than 6 months.
Proof of identity	Year of termination of employment + 6 years
Evidence proving the right to work in the UK	Year of termination of employment + 6 years
Performance Management and Appraisal records	Year of termination of employment + 6 years
Identity Management and authentication	Date of leaving + 1 month
Catering and Biometrics	Date of leaving +1 year
Pay, benefits & Timesheets	Current year + 6 years
Financial information	6 years +1
Images and video	Year of termination of employment + 6 years unless for historical archive purposes
CCTV	2 months
Allegation of child protection against a member of staff	Until the persons normal retirement age or 10 years from the date of allegation whichever is the longer then review. <i>NB allegations found to be malicious are removed from personnel files</i>
Records relating to accident/injury at work	Date of the incident + 12 years. In case of serious accidents, a further retention period will be applied.
Accident reporting	Date of the incident + 6 years

Who We Share School Workforce Information With and Why

We do not share information about workforce members with anyone without consent unless the law and our policies allow us to do so.

Who We Share Data With	Why We Share Data	Transferred to 3 rd Country	Contact Details
3 rd party organisations in any TUPE transfer process	Personal data will need to transfer to new employer. Pension providers - Berkshire Pension Fund (BPF) for the Local Government Pension Scheme (LGPS) – Teachers Pension Scheme		http://www.berkshirepension.org.uk/ https://www.teacherspension.co.uk/
Achieving for Children	Children's Services		www.achievingforchildren.org.uk
Atlantic Data DBS service	We share information for the completion of DBS pre-employment checks that are a		www.atlanticdata.co.uk

	statutory requirement.		
Civica	Finance system		www.civica.com
Doyle Clayton	Data is shared when legal advice is sought or a legal defence is required.		www.doyleclayton.co.uk
Department for Education (DfE.)	<p>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.</p> <p>We are required to share information about our pupils with the (DfE.) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.</p>		www.gov.uk/government/organisations/department-for-education
Disclosure and Barring Service	We share information on a statutory basis.		www.gov.uk/government/organisations/disclosure-and-barring-service
Educare	We share data to enable the provision, set up, monitoring and record keeping of training records	√	www.educare.co.uk
Groupcall Limited	Emerge, Xpressions, IDaaS, Messenger, XoD, Xporter		www.groupcall.com
Health and Safety Executive	Where it is a requirement under RIDDOR Regulations accident details will be shared and discussed with the HSE, Health and safety advisors and Line Managers.		http://www.hse.gov.uk/
I-Connect	Data is shared via this software to transfer data from the LGPS to Berkshire Pension Fund		https://www.iconnectdata.co.uk/
Innovate	Cashless Catering		www.innovatefood.co.uk
Istek	Private fund Manager		www.istekuk.com
Lloyds Bank	Lloyds Link BACS payment system		www.lloydsbank.com
McIntyre Hudson	Data is shared with the schools internal and external audit service - to ensure compliance with internal controls and external regulations		www.macintyreHUDSON.co.uk
National College of Teaching & Leadership	Part of statutory pre-employment checks before and during employment. And during inspections to demonstrate compliance with employment practices and referrals where there is concern about professional conduct or performance		www.gov.uk/government/organisations/national-college-for-teaching-and-leadership
National Fraud Initiative	Data is shared in order to identify cross organisational fraud. Covers areas such as multiple employments, those in receipt of pension and salary, those in receipt of benefits and salary etc.		https://www.nfi.gov.uk/
National Governors Association (NGA)	Governance support service		www.nga.org.uk
Office of National Statistics	Data shared to satisfy the requirements of statutory returns. This is mostly anonymised but may include individual details.		https://www.ons.gov.uk/

Ofsted			https://www.gov.uk/government/organisations/ofsted
OH Works Occupational Health Services	For the provision of advice and guidance on Occupational Health Management, policies, procedures and processes		www.ohworks.co.uk
Papercut	Print management system		www.papercut.com
Pension providers – LGPS administered by Berkshire Pension Fund, TPS, Prudential – AVC provider	3 rd party for administration of contributions and payment of pension benefits.		www.berkshirepensions.org.uk www.teacherspensions.co.uk https://www.pru.co.uk/rz/localgov/
Recognised Trade Unions	Data is shared to meet statutory consultation requirements		https://www.unison.org.uk/ https://www.gmb.org.uk/ http://www.naht.org.uk/ https://neu.org.uk/ https://www.ascl.org.uk/
Royal Borough of Windsor and Maidenhead	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.		www.rbwm.gov.uk
RBWM Health and Safety Department	We share personal data for the investigation of accidents and for the provision of advice and guidance on H and S Management, policies, procedures and processes.		www.rbwm.gov.uk
Royal Borough of Windsor and Maidenhead Human Resources department	We share personal data for all HR processes before and during and after employment for data validation, issue resolution and HR advice and guidance on all HR administration, HR Management, policies, procedures and processes.		www.rbwm.gov.uk
RBWM Payroll dept. HMRC DWP HM Courts and Tribunal Service	In order to legally and accurately process payroll and deductions		www.rbwm.gov.uk HMRC https://www.gov.uk/government/organisations/hm-revenue-customs DWP https://www.gov.uk/government/organisations/departments-for-work-pensions HM Courts and Tribunal Service https://www.justice-ni.gov.uk/topics/courts-and-tribunals
RPA – Government Insurance Provider	Data will be shared to manage litigation and comply with insurance conditions.		www.gov.uk/guidance/academies-risk-protection-arrangement-rpa
Sign In Central Record	Single Central Record web portal		www.signincentralrecord.com
SIMS Personnel & SIMS.net	3 rd party HR system software provider - are given access to our database for; helpdesk call		www.capitaeducationsoftware.co.uk

	resolution, issue resolution, system development consultancy and reporting		
Sophos XGS	Sophos Secure Web Gateway Web Filter and Unified Threat Management		www.sophos.com
Sodexo	Data is shared with 3 rd party benefit suppliers that the employee has chosen to sign up to e.g. child care vouchers	√	https://uk.sodexo.com/home.html
sQuidcard Limited	sQuid Cashless Catering		www.squidcard.com
Tassomai Ltd	Tassomai	√	https://www.tassomai.com/
Thames Valley Police	We share information where the safeguarding of students is required or criminal activity is suspected		www.thamesvalley.police.uk
Various 3 rd parties requesting earnings confirmation for mortgages, loans etc	At the request of the employee		
Various 3 rd parties requesting references or continuous service date confirmations	Data is shared when potential new employers request a reference or details of employment		
Veale Wasborough Vizards	Data is shared when legal advice is sought or a legal defence is required.		www.vwv.co.uk
Zurich Municipal Insurance	Data will be shared to manage litigation and comply with insurance conditions.		https://web.zurich.co.uk/municipal/

Data Collection Requirements

The DfE collects and processes personal data relating to those employed by schools 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>

Requesting Access to Your Personal Data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the School Business Manager in writing.

You are entitled to submit subject access requests all year round, but please bear in mind that it may be necessary for us to extend the response period when requests are submitted over the summer holidays. This is in accordance with article 12(3) of the GDPR, and will be the case where the request is complex – for example, where we need multiple staff to collect the data.

You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress;
- Prevent processing for the purpose of direct marketing;
- Object to decisions being taken by automated means;
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- Claim compensation for damages caused by a breach of the Data Protection regulations.

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:

Data Protection Officer: The Information Commissioner's Office at <https://ico.org.uk/concerns/>

Further Information

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

Colin Howard	Data Protection Officer	Concerns about Cox Green Schools Data Protection procedures; Reporting of breaches of Data Protection	help@satswana.com 01252 546898
Danny Edwards	Headteacher, Cox Green School	For general information on how we use your data	enquiries@coxgreen.com 01628629415
Tom Smith	IT and Site Facilities Operations Manager, Cox Green School	For queries relating to this privacy notice; object to the processing of personal data; prevent processing for direct marketing; object to decisions being taken by automated means; to have inaccurate data rectified; to request data is erased or destroyed; to report a breach of Data protection regulations.	t.smith@coxgreen.com 01628 629415