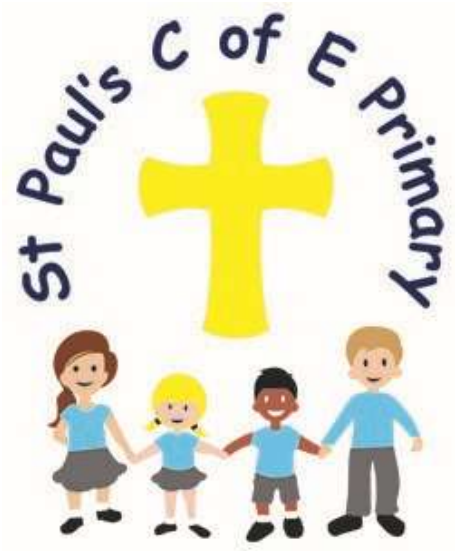
St. Paul's C of E Primary School

Privacy Notice



School Workforce

How we use workforce information

We, St. Paul's C E Primary School, are a data controller for the purpose of the UK General Data Protection Regulation (GDPR). This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our school. This will include data that we obtain from you directly and data about you that we obtain from other people and organisations.

We collect your information to;

- Enable individuals to be paid.
- Facilitate safe recruitment.
- Support occupational health functions, including the management of health assessments, workplace adjustments, absence management
- Enable the development of a comprehensive picture of the workforce and how it is deployed.
- Inform the development of recruitment and retention policies.
- Support effective performance management.
- Enable ethnicity and disability monitoring.
- Produce the single central record.
- Monitor the security of the school's site to ensure the safety and wellbeing of staff, pupils and visitors

The categories of school information that we process

These include:

- Personal information (such as name, date of birth, employee or teacher number, national insurance number).
- Characteristics information (such as gender, age, ethnic group)
- Contract information (such as start date, hours worked, post, roles and salary information)
- Work absence information (such as number of absences and reasons)
- Qualifications (and, where relevant, subjects taught)
- Finance information (such as pension details, banks details, HMRC declarations, employee benefits
- Medical information (such as health data, occupational health referrals).
- Disclosure and Barring information.
- Images and video footage (CCTV)

The lawful basis on which we use this information

When we collect, process or share your information, we ensure it is lawful for at least one of the following reasons:

- **Article 6 (b) – Contract**
  processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- **Article 6(1)(c) - legal obligation**
  We are required to process your data so that we meet the legal requirements imposed upon us.
- **Article 6(e) - public interest**
  Processing your data is necessary to perform tasks that schools are required to perform as part of their statutory function to ensure your child receives an education.

Sometimes, we may also use your personal information where:

- **Article 6(1)(a) – consent**
  You have given us consent to use your data in a particular way.
- **Article 6 (d) - vital interest**
  It is in your or another's vital interests for your personal information to be passed to these people or services, to the extent that it is necessary to save someone's life.

We do not process any special categories of personal data, except where necessary under the following provisions:

- Explicit consent is given by the data subject **(Article 9(2)(a)).**
- Where the processing is necessary for the purposes of carrying out obligations in the field of employment and social security **(Article 9(2)(b))**
- Where the processing is necessary for reasons of substantial public interest, including for purposes of equality of opportunity and treatment, where this is in accordance with our Data Protection Policy. **(Article 9(2)(g))**.
- Where the processing is necessary in order to ensure your health and safety on the school premises, including making reasonable adjustments for any disabilities you may have. **(Article 9(2)(h)).**

Where the legal reason for processing your personal information is based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of our processing prior to your withdrawal. Please contact the Headteacher should you wish to withdraw your consent for any of the above activities.

Collecting workforce information

We collect personal information via the individual staff members/Governors, Local Authority, HR services, previous employers, and DBS department.

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 staff data securely in line with our data retention schedule.

When this information is no longer required, it will be confidentially destroyed or deleted.

For more information on our data retention schedule and how we keep your data safe, please contact admin@st-pauls.stockport.sch.uk.

Who we share workforce information with

We routinely share this information with:

- our local authority, Stockport Metropolitan Borough Council
- the Department for Education (DfE)
- Our Occupational Health provider
- Our Staff Insurance Provider
- Our HR Provider

There may be circumstances in which we may lawfully share personal data with third parties where, for example, we are required to do so by law, by court order, or to prevent fraud or other crimes. Where we share data, however, we shall do so in accordance with applicable data protection laws.

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, SMBC, under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

The Council commit to only using the data for the purposes which correspond with their statutory duties and will not pass this information onto any third parties without specific agreement.

Data will be transferred electronically by an agreed appropriate secure data transfer mechanism, complying with data security under the General Data Protection Regulation, such as encrypted files via the internet, SIMS or the DfE COLLECT system, where appropriate. Information is primarily shared with the Local Authority via secure email, uploaded onto Office Online or via Royal Mail.

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.

The workforce data that we lawfully share with the DfE through data collections:

- informs departmental 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

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.

Sharing by the DfE

The 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 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 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.

To contact DfE: 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 please contact admin@st-pauls.stockport.sch.uk, or alternatively you can view our Data Subject Rights Guidance on the school website.

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

Contact us

If you would like to discuss anything in this privacy notice, please contact:
Mrs H. Saville
School Business Manager

Or the School's Data Protection Officer:
IGschoolsupport@stockport.gov.uk

Complaints

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance. Please contact admin@st-pauls.stockport.sch.uk.

Following any complaint response, if you remain unsatisfied with the way we have handled your personal information, you have the right to make a complaint to the Information Commissioner.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Email: https://ico.org.uk/concerns/

Document Control

Title	School Privacy Notice – School Workforce
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Revision and Approval

Reviewed by	SMBC IG Team
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Approved by (school)	TBC
Approval date	TBC
Next review date	01/09/2028
Any changes made	Reissued in line with new DfE guidance 2025. Complaints section reviewed in line with the Data Access and Use Act 2025

Change History

Version	Author	Issue Date	Review date	Changes made?
V1	SMBC IG Team	15.06.2018	01.09.2019	No Changes
V2	SMBC IG Team	01.09.2019	01.09.2020	No Changes
V3	SMBC IG Team	23.09.2020	01.09.2021	Updated changes regarding Consent
V4	SMBC IG Team	10.11.2021	01.09.2022	Legislation update
V5	SMBC IG Team	01.11.2022	01.09.2024	We collect; Categories; Storing data, Sharing data
V6	SMBC IG Team	04/10/2024	01/09/2026	How we use info (standardised), Lawful basis, complaints