



## **Privacy notice for the school workforce**

## Privacy notice – how school workforce information is used

### What categories of information are processed?

The categories of personal information that we process include the following:

- Personal information – e.g. name, address, employee or teacher number, National Insurance number, and contact details
- Characteristics information – e.g. gender, age and ethnicity
- Contract information – e.g. start date, hours worked, post, roles and salary information
- Payroll Information, e.g. bank details
- Work absence information – e.g. number of absences and reasons for absence
- Medical Information - where relevant and risk assessments to support this information
- Qualifications and, where relevant, the subjects taught

This list is not exhaustive – to access the current list of categories of information the school processes, please request to see the school's Data Asset Register, which can be found on the schools SMT Drive and can be accessed via the schools Data Protection Officer (DPO) or Senior Responsible Individual (SRI)

### Why do we collect and use your information?

We collect and use your information for the following reasons:

- To enable the development of a comprehensive picture of the workforce and how it is deployed
- To inform the development of recruitment and retention policies
- To enable effective communication between the employee and employer
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Ensure that appropriate access arrangements can be provided for candidates that require them
- To enable individuals to be paid

Under the UK General Data Protection Regulation (UK GDPR), the legal basis/bases we rely on for processing personal information for general purposes are:

- **Consent:** The individual has given their clear permission to process their data. Consent must be freely given, explicit, and can be withdrawn at any time.
- **Contract:** The processing is necessary for a contract or because the individual has requested specific steps.
- **Legal obligation:** The processing is required to comply with the law.
- **Vital interests:** The processing is necessary to protect an individual's life.
- **Public interest:** The processing is necessary to carry out a public task or official function that is clearly based in law.
- **Legitimate interests:** The processing is necessary for the school's or a third party's legitimate interests, unless there is a good reason to protect the individual's data.

The school does not process **special category data** (aka sensitive personal data) unless it is considered essential. 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 UK 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 UK data protection law. Conditions include:

- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- 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

## **How do we collect your information?**

We collect your personal information via the following methods:

- Staff Induction forms and within the induction process
- Medication forms
- Appraisals or at review meetings

- Tracking Continued Professional Development
- Information supplied voluntarily by the employee

Workforce data is essential for the school's operational use. Whilst most information you provide to us is mandatory, some of it is requested on a voluntary basis. To comply with the UK 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.

### **How do we store your information?**

Your personal information is retained in line with the school's Security Policy and Data Protection Policy which can be found on the schools policy drive.

Data is stored electronically on the schools Google Drive with limited access for school managers. The school aims to be paperless, but where this is unavoidable data is stored in locked cabinets with limited access. 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. We will dispose of your personal data securely when we no longer need it, inline with the schools data retention schedule.

### **Who do we share your information with?**

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

- The local authorities we work with – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Government departments or agencies
- Our regulator e.g. Ofsted, Independent Schools Inspectorate
- Suppliers and service providers, e.g GGPM HR Service, BUPA Health Care, Now Pensions
- Financial organisations
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

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

### **What are your rights?**

You have specific rights to the processing of your data; these are the right to:

- Request access to the information the school holds about you.
- Restrict our processing of your personal data, i.e. permitting its storage but no further processing.
- Object to direct marketing (including profiling) and processing for the purposes of scientific and/or historical research and statistics.
- Have your personal data rectified if it is inaccurate or incomplete.
- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.
- Request the deletion or removal of personal data where there is no compelling reason for the continued processing.

If you want to request access to the personal information we hold about you, please contact DPO - David Cowell via email - [david.cowell@alpschools.org](mailto:david.cowell@alpschools.org)

If you are concerned about the way we are collecting or using your information, please raise your concern with the school's DPO in the first instance. You can also contact the ICO at <https://ico.org.uk/concerns>.

### **How to withdraw consent and lodge complaints**

Where our school processes your personal data with your consent, you have the right to withdraw your consent at any time.

If you change your mind or are unhappy with how our school uses your personal data, you should let us know by contacting the DPO, David Cowell - [david.cowell@alpschools.org](mailto:david.cowell@alpschools.org)

### **Updating this privacy notice**

We may need to update this privacy notice periodically if we change how we collect and process data. The school will inform you when this privacy notice has changed; however, we also recommend that you revisit this privacy notice periodically on the school website.

This privacy notice was last updated on 7th November 2024.

### **How can you find out more information?**

If you would like to discuss anything in this privacy notice, please contact DPO, David Cowell, via email [david.cowell@alpschools.org](mailto:david.cowell@alpschools.org)

If you require further information about how we store and use your personal data, please visit our website, [www.alpschools.org](http://www.alpschools.org), the Gov.UK website (<https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>) or download our Data Protection Policy, which can also be found on the school website.