

Appendix 2c: Privacy Notice 3

PRIVACY NOTICE FOR THE SCHOOL WORKFORCE

Overview

You have a right to be informed about how the school uses the personal data we hold about you. This Privacy Notice for members of the school workforce explains how and why we collect, hold and share personal data of those in the school's employ and what information that is.

The Personal Data we hold

Highgate Wood School gets personal information from you and may receive information about you from your employee or referee.

We also maintain a record of any ongoing professional development or training events you have attended, your attendance record (including number of absences and reasons), your record of purchases through the school catering system as well as the footprint of your activity on your accounts of the various school systems and services.

The information we hold on the school systems includes:

- your contact information, including home phone and email addresses
- your next of kin name and contact details
- special categories of data including your gender, age, ethnic group (if supplied)
- personal information (such as name, employee or teacher number, national insurance number)
- your photograph,
- contract information (such as start dates, hours worked, post, roles and salary information)
- work absence information (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught)
- information connected to performance and performance appraisal (where relevant).
- relevant medical information

Why we collect and use this information

We use school workforce data to effectively manage staffing in the school, help ensure that staff are safe, that they are paid and that the school fulfils its various obligations as an employer. Workforce data is also used to enable the development of a comprehensive picture of staffing, how it is deployed, developed, recruited and retained.

The legal basis for the school using your information

In accordance with data protection law, Highgate Wood School will only process personal information when there is a clear and legal basis to do so.

- ◆ Most often the legal basis for us handling your personal data is in our exercise of official authority as a state school to carry out tasks in the **public interest** (in order to provide students with an education).
- ◆ There are times when the most appropriate legal basis for us processing data is under our **legal obligation** in order to comply with the statutory obligations we have as a school.
- ◆ In relation to the transfer of the small amounts of personal data that are shared with 3rd party providers to enable the online tools and facilities that we use **legitimate interest**

provides the legal basis for the sharing of your data. This is considered most appropriate where data is being used in ways that are reasonably expected and have a minimal privacy impact.

- ◆ Less commonly we may have to share data for reasons of **vital interest** to protect you (or someone else)
- ◆ On occasions we will collect, use or share personal data on the grounds of **consent**. Where this is the case you will be informed and should be confident that you are aware that your consent can be withdrawn at any time (see below).

Providing personal information voluntarily

Whilst the majority of personal information we hold and process is mandatory there will be instances when you provide access to personal information voluntarily. We will inform you whether you are required to provide certain information to us or if you have a choice in this. Where there is a choice, it is important you understand that your consent needs to be sought and given freely, without pressure, and that you are entitled to withdraw that consent at any time.

Storing personal information

We collect and store personal information about students who are currently attending our school and are required to retain some information beyond then.

[The Information Management Toolkit for Schools](#) provides an outline of what information schools are required to retain and for how long. This publication forms the basis of the school's own Record Management Policy.

Personal data that is no longer active but still needs to be retained is archived securely. Access to archived material is more restricted than personal data that is being actively used.

Some personal data is retained for internal processes so that the school is able to carry out analysis on its effectiveness with different cohorts of students. Where this is the case the data will be stripped of identifiers and anonymized to the extent that it would be impossible to identify any single individual within those data sets.

Sharing personal information

We will not share information about you with any third party without your 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 some of your personal information with:

- The local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- The Department for Education – to meet our legal obligations to share certain information with it, including census returns
- Your family or representatives
- External educators and examining bodies
- Ofsted and other statutory regulators
- Suppliers and service providers – to enable them to provide the service we have contracted them for

Why we share personal data from our workforce information

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 educational attainment.

The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) 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>

Third Party Suppliers and Service Providers

We share some of your data with third party suppliers. These include, or have included, SAM Learning (for revision resources), Wisepay (for online payments), e-praise (for sharing behavior, achievement, attendance information online), Show My Homework (for setting Homework online), London Grid for Learning (for student email, Office 365 accounts), Parentmail (for text and email communications with home).

The school takes steps to ensure that all these third party suppliers and service providers are compliant with current data protection legislation. Where appropriate we will also provide links to the third party's privacy notices and other relevant data protection information.

Your rights

Requesting access to the personal information we hold about you

Under data protection legislation, students, staff, parents and others have the right to request access to information about them that we hold. To make a request for your personal information, or for a parent\carer to be given access to their child's educational record, contact the school's Data Protection Officer at dataprotection@hws.haringey.sch.uk

All data subjects 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 Highgate Wood School's collection or use of your personal data we request that you raise your concerns with our data protection officer in the first instance.

Complaints

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we have done something wrong. You can make a complaint at any time by contacting our data protection officer.

You can also complain to the Information Commissioner's Office in one of the following ways:

Online by visiting <https://ico.org.uk/concerns/>

By phone by calling: 0303 123 1113

Or by writing to: Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

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: dataprotection@hws.haringey.sch.uk

Our current data protection officer is Tristan Ashman