



Privacy Notice

(How We Use School Workforce Information)

This Privacy Notice for school workforce explains how and why we store personal information about those employed by the school or otherwise engaged to work at the school. It provides a guide to our legal obligations and their own rights. Like any organisation which handles personal data, our school is the 'Data Controller' as such, we are registered with the ICO (Information Commissioner's Office) and we comply with UK General Data Protection Regulation (UK GDPR).

The Categories of Workforce Information That We Process Include:

Personal Information	<ul style="list-style-type: none"> Name, date of birth, gender, address, email address, telephone number Next of kin and emergency contact numbers Bank account details, payroll records National Insurance number, tax status information Employee or teacher number Medical conditions
Characteristics	<ul style="list-style-type: none"> Ethnicity, language, nationality, country of birth
Attendance Information	<ul style="list-style-type: none"> Absence data and Sickness records.
Employment / Recruitment / Contract Information	<ul style="list-style-type: none"> Copy of passport/driving license References Self-Disclosure forms DBS checks Verification of the right to work in the UK Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships Start dates Hours worked Post / roles Salary information, annual leave, pension information P45 forms
Other	<ul style="list-style-type: none"> Appraisal / Performance Management notes and reports Continued professional development information Outcomes of any disciplinary and/or grievance information Disciplinary information Grievances Sickness records

This list is not exhaustive.

Why We Collect and Use Workforce Information

We use workforce data to:

- Enable the deployment of a comprehensive picture of the school workforce
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Enable you to be paid correctly
- Provide support to staff when required (e.g. medical emergencies)
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable equalities monitoring
- Make sure our information and communications systems, equipment and facilities (e.g. laptops, ipads) are used appropriately, legally and safely

Our lawful basis for using this data

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

(6a) Consent: employees and others who work in the school have given clear consent for us to process their personal data for the purposes indicated above.

(6c) A Legal obligation: the processing is necessary for us to comply with the law.

(6d) A duty to safeguard pupils: the processing is necessary in order to protect the vital interests of the data subject (e.g. we are required to have evidence that staff have DBS clearance)

(6e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.

The lawful bases for processing personal data are set out in Article 6 of the UK General Data Protection Regulation.

Our basis for using special category data

For special category data, we only collect and use it when we have both a lawful basis, and one of the following conditions for processing as set out in Article 9 of the UK General Data Protection Regulation.

(9.2a) explicit consent. In circumstances where we seek consent, we make sure that the consent is unambiguous and for one or more specified purposes, is given by an affirmative action and is recorded as the condition for processing. Examples of our processing include health information we receive from our staff who require a reasonable adjustment to access our site and services.

(9.2b) 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.

(9.2c) where processing is necessary to protect the vital interests of the data subject or of another person. An example of our processing would be using health information about a member of staff in a medical emergency.

(9.2f) for the establishment, exercise or defence of legal claims. Examples of our processing include processing relating to any employment tribunal or other litigation.

(9.2g) reasons of substantial public interest. As a school, we provide a safeguarding role to young and vulnerable people. Our processing of personal data in this context is for the purposes of substantial public interest and is necessary for the carrying out of our role. Examples of our processing include the information we seek or receive as part of investigating an allegation.

We process criminal offence data under Article 10 of the UK GDPR. We will only collect and use it when we have both a lawful basis, and one of the following conditions:

- 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 where you're physically or legally incapable of giving consent)
- The data concerned has already been made 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 the reasons of substantial public interest as defined in legislation.

Collecting Workforce Information

The majority of information we collect about you is mandatory. There is some information 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 you will come directly from you. We may also hold data about you from Local Authorities; Government departments or agencies; police forces, courts or tribunals.

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 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 in this.

Storing Workforce Information

We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please speak to a member of the Data Protection Team, or email dataprotection@ringwoodwaldorfschool.org.uk

Who We share Workforce Information With

We routinely or occasionally share aspects of workforce information with:

- Our regulator, Ofsted
- The Department for Education (DfE)
- HMRC (for PAYE)
- Local Authority
- Suppliers and service providers with whom we have a contract, e.g. Payroll (Xero), Pension provider (Nest), HR consultants (WorkNest), Auditors (Knight Goodhead)

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.

Our regulator, Ofsted

We are required to share information about our workforce members with Ofsted during an inspection if required

Department for Education

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections.

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](#).

For more information, please see 'How Government uses your data' section.

Suppliers and Service Providers

We are required to share certain information about our school workforce with suppliers and service providers (e.g. pensions information) to enable staff to undertake the legal responsibilities of their role.

HMRC

We share a Full Payment Submission monthly to HMRC in order for them to ensure correct PAYE deductions or additions to your salary.

Service Providers

Payroll- to process remuneration; Pensions, to pay in to your pension; HR consultants, to assist with our HR responsibilities. Auditors, in order to conduct an annual financial audit.

Local Authority

If required for safeguarding purposes, we may share data with our LADO.

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 us at dataprotection@ringwoodwaldorfschool.org.uk

Depending on the lawful basis used for processing data (as identified above), you may also have the right to:

- have your personal data rectified if it is inaccurate or incomplete;
- request the deletion or removal of personal data where there is no compelling reason for its continued processing;
- 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/historical research and statistics; or
- not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.

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 the Information Commissioner's Office at <https://ico.org.uk/concerns/>

For further information on how to request access to personal information held centrally by DfE, please see the 'How Government uses your data' section of this notice.

Withdrawal of Consent and the Right to Lodge a Complaint

Most of the data we process does not require your consent. However, where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting dataprotection@ringwoodwaldorfschool.org.uk

Last Updated

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated March 2024.

Contact

If you would like to discuss anything in this privacy notice, please contact the Data Protection Team, in the office, or via dataprotection@ringwoodwaldorfschool.org.uk

How Government Uses Your Data

The workforce data that we lawfully share with the Department for Education (DfE) through data collections:

- informs the Department for Education (DfE) 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

Data Collection Requirements

To find out more about the data collection requirements placed on us by the Department for Education (DfE) including the data that we share with them, go to

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Sharing by the Department for Education (DfE)

The Department for Education (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 Department for Education (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 the Department for Education (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.

How to Find Out What Personal Information the Department for Education (DfE) Hold About You

Under the terms of the Data Protection Act 2018, you're entitled to ask the Department for Education (DfE):

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the Department for Education (DfE)'s personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>