

Privacy Notice (How we use your information)

The categories of school information that we collect and process include:

- Your name, address and contact details, including email address and telephone numbers, date of birth and sex;
- The terms and conditions of your employment or engagement;
- Resignation and notice letters;
- Details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with us;
- Information about your remuneration, including entitlement to benefits such as pensions or insurance cover, any salary sacrifice deductions, pension deductions and tax details;
- Details of your bank/building society account and national insurance number;
- Information about your marital status, next of kin, dependants and emergency contacts;
- Information about your nationality and entitlement to work in the UK and information from related documents such as your passport or other identification information;
- Disclosure & Barring Service information and details of your criminal record where relevant to your employment;
- Details of any allegations regarding children and vulnerable adults;
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief; gender re-assignment, marital status, caring commitments status;
- Details of your schedule (days of work and working hours) and attendance at work;
- Details of periods of leave taken by you, including holiday, sickness absence, family and maternity leave and unpaid leave, and the reasons for the leave;
- Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- Assessments of your performance, including probation, appraisals, performance reviews and ratings, performance improvement plans and related correspondence;
- Details of training you have participated in and policies that you have received and acknowledge that you will abide by;
- Details of any redundancy estimates and pension costs;
- Information about medical or health conditions, including whether or not you have a disability for which the School needs to make reasonable adjustments;
- Details of trade union membership where subscriptions are deducted from your salary;
- Information about your use of School IT, communication and other systems and other monitoring information. A record that you have received and acknowledge that you will abide by our IT policies;
- Details in references about you that we give to others;
- Health and Safety Records;
- Where you use a car for work purposes, car make, model and details of your business use insurance, evidence of MOT and road tax;
- Digital imagery (such as photographs and video of trips and activities);
- CCTV footage (please refer to the CCTV Policy on the School's website).

This list is not exhaustive and may be subject to change, to access the current Privacy Notice, including the list of categories of information we process please see Teacher share > Policies > Current Policies > Data Protection > Workforce Privacy.

Why we collect and use workforce information

We need to collect and process your data so that we can:

- Run recruitment and promotion processes;
- Maintain accurate and up-to-date employment records and records of employee contractual and statutory rights;
- Maintain accurate and up-to-date contact details (including details of who to contact in the event of an emergency) to ensure effective communication with staff and to put into effect the school's emergency plans when necessary;
- Monitor compliance by you, us and others with our policies and contractual obligations;
- Operate and keep a record of disciplinary and grievance processes raised by or involving you, to ensure acceptable conduct within the workplace;
- Operate and keep a record of employee appraisals and performance related processes, to plan for career development, and for succession planning and workforce management purposes;
- Operate and keep a record of absence and absence management procedures, to allow effective workforce management;
- Obtain occupational health advice, to ensure that we comply with duties in relation to individuals with disabilities and meet our obligations under health and safety law;
- Operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that we comply with duties in relation to leave entitlement;
- Ensure that employees are receiving the pay or other benefits to which they are entitled;
- Answer questions from insurers about any insurance policies which apply to you;
- Ensure effective general HR and business administration;
- Provide references on request for current or former employees;
- Prevent and detect fraud or other criminal offences;
- Respond to and defend the School in respect of any investigation or litigation and to comply with any court or tribunal orders for disclosure;
- Monitor diversity and equal opportunities and maintain and promote equality in the workplace;
- And any other reason which we may notify you of from time to time.

The School processes your data in accordance with our obligations under the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

The legal basis for our use of your personal data will generally be one or more of the following, under Article 6 of UK GDPR:

- processing is necessary for the performance of the contract of employment;
- processing is necessary to comply with a legal obligation (for example to comply with employment law, tax law, immigration law, health and safety law and safeguarding legislation);

- processing is necessary for the performance of a task carried out in the public interest (and when we process data for this reason we consider whether or not our interests are overridden by the rights and freedoms of employees or workers and have concluded they are not. An example would be when we need to manage performance or conduct);
- Consent (we will only use this in limited circumstances, for example equalities monitoring data).

When we process special categories of data or criminal conviction data we also ensure that one or more of the specified conditions are met under UK GDPR – Article 9.

- **Equalities Monitoring:**

We gather equalities data so that we can monitor equalities data in the workplace. The lawful basis for processing would be consent, and the additional condition that we will rely on is consent. Any equalities reporting would be anonymised. Only the Office team would have access to individualised data in this instance. You have the right to withdraw your consent to processing for this purpose at any time.

- **Health and medical information:**

This is collected to allow us to fulfil legal obligations e.g. those in relation to disabilities, to perform the contract e.g. to pay contractual sick pay and to manage sickness absence. The conditions we will rely on are to carry out our obligations under employment law and for the purposes of occupational medicine.

You can refuse to supply information about your health conditions and this may mean decisions will be taken solely on the information available.

- **Trade union membership:**

Information about trade union membership is processed when you authorise us to deduct trade union subscriptions from your salary. The lawful reason for processing is consent, as is the condition for processing.

- **Criminal conviction data:**

Most posts in schools require us to carry out DBS checks, and this means we may access criminal conviction data about you. The statutory guidance “Keeping Children Safe in Education” requires us to undertake the checks for these roles. We therefore have a legal obligation to do this, and the condition we will rely on is UK law.

Collecting workforce information

Much of your personal data is provided by you and is collected through information you give to us including:

- At the start of your working relationship e.g. your application form; new employee forms; identity documents such as your passport or your driving licence;
- During your work at the School e.g. when applying for employee benefits, maternity, adoption, or paternity leave, completing DBS applications, submitting fit notes and pension beneficiary nomination forms;

- From correspondence with you; or through interviews, meetings or other assessments.

In some cases, the School, with your consent, will collect personal data about you from third parties, such as references supplied by former employers and information from criminal records checks permitted by law.

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 visit Teacher share > Policies > Current Policies > Data Protection > GDPR Data Protection Policy and Retention Schedule, also available from the School website.

Who we share workforce information with?

We routinely share relevant information with:

- our local authority;
- the Department for Education (DfE);
- the Governing Body;
- other staff (relevant details only);
- our Payroll provider and HR consultancy (Strictly Education);
- our Occupational Health provider when required (Medi gold);
- our childcare voucher provider (Sodexo);
- parents/carers and visitors to the school (basic details only, such as your name, job title and work email address);
- the public, such as in newsletters and articles on the school website (basic details only, as above);
- companies which provide IT and administrative services to the school;
- organisations and professionals who provide services to the school, such as sports coaching (JC Academy and Smiths Sports Academy), music tuition (Croydon Music & Arts, the Steel Pans Agency, i-Rock), therapy & counselling services (Croydon Drop-In), language tuition, school photography (Kittle Photographic), school travel and catering services (Harrison);
- the Police and organisations involved with safeguarding.

Our payroll provider organises the transfer of taxation payments and tax information to HMRC and data regarding pension payments to the Croydon sections of the Local Government and Teachers' Pension Schemes.

We require those third parties to keep your personal data confidential and secure and to protect it in accordance with the law and our policies. They are only permitted to process your data for the lawful purpose for which it has been shared and in accordance with our instructions.

Please see Appendix 1 for the most recent list of companies and organisations we are working with.

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

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.

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

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 Data Protection Officer, via the School Office.

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
- a right to seek redress, either through the ICO, or through the courts.

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/>

Contact

If you would like to discuss anything in this privacy notice, please contact the Data Protection Officer, via the School Office.

How Government uses your data

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.

Data collection requirements

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 Department

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.

To contact the department: <https://www.gov.uk/contact-dfe>

Appendix 1: Providers of Services, IT & Software Suppliers 2021-22

The school works with a number of service providers and IT suppliers in order to effectively perform tasks in the public interest, or to comply with legal obligations. We share certain personal data with these organisations. For more information as to how the data is processed and kept secure, please refer to the organisation's data protection and privacy policies.

Asset for Schools – data extraction from SIMS (names & attendance data for Looked After Children) <https://www.assetforschools.org/website/privacy-policy>

Atom wide (AdEPT) – email accounts, online security, remote access & digital signage (pupil, parent, staff & governor data, including sensitive data. Pupil & staff photos.) <https://www.atomwide.com/privacy.html>

Capita plc - SIMS (school management information system: all pupil, parent, staff & governor data, including sensitive data and pupil photos) <https://www.capita-sims.co.uk/privacy-notice>

Capita plc – Reading Cloud library management system (pupil names, dates of birth, class/staff names) <https://www.capita-readingcloud.co.uk/privacy-notice>

Harrison – school catering service: (pupils names, staff names, allergy information) <https://www.harrisoncatering.co.uk/>

Croydon Music & Arts – music tuition (pupil names, ages and sensitive data required to ensure pupil safety/staff names & school email addresses) <https://www.croydon.gov.uk/democracy/data-protection-freedom-information/privacy-notices/education-youth-engagement-service-privacy-notice>

Croydon Council Local Government Pension Team – pensions support (support staff names, school email addresses & pension details) <https://www.croydonpensionscheme.org/croydon-pension-fund/privacy-policy-and-cookies>

Croydon Teachers Pensions – pensions support (teaching staff names, school email addresses & pension details) <https://www.croydon.gov.uk/democracy/data-protection-freedom-information/privacy-notices/corporate-privacy-notice>

Cunningham's – cashless till (pupil names, staff names and allergy information) <https://www.cunninghams.co.uk/mint-project/uploads/666520732.pdf>

Croydon Drop In – counselling service for pupils (pupil names, ages and sensitive data required to provide the service/staff names & school email addresses). enquiries@croydondropin.org.uk

Eduspot (formerly Teachers2Parents) – texting service (pupil names/ parent, staff names & mobile numbers) <https://eduspot.co.uk/privacy-policy/>

Edukey (TES) - provision maps & intervention tracking (pupil data, including sensitive data/ staff names & school email addresses) <https://www.edukey.co.uk/privacy/>

Google G Suite – data storage & sharing (pupil & staff names, school email addresses) <https://policies.google.com/privacy?hl=en-GB>

Groupcall - data extraction from SIMS for library system (pupil names/staff names & school email addresses). <https://www.groupcall.com/privacy>

Guys & St Thomas's NHS Foundation Trust – speech & language support for pupils (pupil names, ages and sensitive data; staff names & school email addresses). <https://www.england.nhs.uk/contact-us/privacy-notice/>

iRock – music tuition (pupil names, ages and sensitive data required to ensure pupil safety/staff names & school email addresses). <https://irockschool.com/privacy-policy/>

Kittle Photographic – school photographs (individual and class photos for pupils & staff). <https://kittlephoto.com/privacy-policy.html>

London Grid for Learning – broadband, Egress accounts (staff names & school email addresses) <https://static.lgfl.net/LgflNet/downloads/policies/LGfL%20Privacy%20Notice.pdf>

Mirodo Education.com – SATS Companion online assessment (pupil names, dates of birth/staff names & school email addresses) <https://mirodoeducation.com/data-protection-policy/>

Octavo Partnership – IT service provider (access to SIMS data, including sensitive data for pupils

and staff) <https://www.octavopartnership.org/privacy-notice-complaints/>

Opeus.com – SMSC grid maker, evidence for SMSC curriculum (may include pupil & staff photos) <http://smsc.opeus.org/privacy>

Rakuten Overdrive – e-books (pupil ID's from library system) <https://company.cdn.overdrive.com/policies/privacy-policy.htm>

ParentPay – school meal payments (pupil name, parent & staff names/email addresses/card details). Viewed only by school staff. <https://www.parentpay.com/privacy-policy/>

Pearson Active Learn – Abacus Maths & English (staff names & school email addresses) <https://www.pearson.com/uk/pearson-privacy-and-you/privacy-policy/digital-learning-services-privacy-policy.html>

Smith's Sports Academy – sports coaching (pupil names, ages and sensitive data required to ensure pupil safety/ staff names & school email addresses). asmith@smithssportsacademy.com

Steel Band Agency - music tuition (pupil names, ages and sensitive data required to ensure pupil safety/ staff names & school email addresses). info@steelpanagency.com

Strictly Education – HR & payroll provider (staff names, dates of birth, contact details, NI numbers & contract details) <https://www.strictlyeducation.co.uk/privacy-policy>

WhatsApp – group messaging (staff names & mobile numbers) <https://www.whatsapp.com/legal?doc=privacy-policy&version=20120707>

Wonde – data extraction from SIMS for Eduspot, Education City & Edukey (pupil data, including sensitive data; parent names/mobile numbers/ staff names, school email addresses & mobile numbers) <https://wonde.com/privacy-policy>

3PLearning – Mathletics & Readwriter online learning (pupil names, dates of birth/ staff names & school email addresses) <https://www.3plearning.com/privacy/>

Renaissance Learning – Star Reading, Star Maths, Freckle (pupil names, dates of birth/ staff names & school email addresses) <http://www.renlearn.co.uk/privacy-hub/>

NFER – Online Assessment Analysis Tool (pupil names, ages and sensitive data required to aid equality of opportunity/staff names & school email addresses) <https://www.nfer.ac.uk/privacy/>

Inventry – online register of staff on site and visitors (photographs taken of visitors). <https://www.inventry.co.uk>

Times Tables Rockstars - (pupil names, dates of birth/staff names & school email addresses) <https://ttrockstars.com/>

Single Central Record – (staff names and sensitive data required to ensure pupil safety) <https://on-linescr.co.uk/>

Appendix 2: Elmwood Junior School Data Protection Declaration

I confirm that I understand:

- The categories of my personal information that the School collects and uses.
- The reasons why the School processes my data.
- That the School has a lawful basis for collecting and using my personal information.
- That the School will always ask for explicit consent where this is required by law and I must provide this consent if I agree to the data being processed.
- That where the School is processing my data based on consent, I have a right to withdraw this consent at any time.
- That the School may share relevant information with the DfE, LA and other stated organisations and individuals.
- That the School does not share information about me with anyone without my consent, unless the law and our policies allow us to do so.
- That my data is retained securely in line with the school's GDPR Data Protection Policy.
- My rights to the processing of my personal information.
- Where I can find out more information about the processing of my personal data.
- The terms of the School's GDPR Data Protection Policy.

NAME: _____

SIGNATURE: _____

DATE: _____

Please return the signed declaration form to the School Office