



## **Privacy Notice (How we use workforce information)**

### **The categories of school information that we process**

These include:

- personal information (such as name, employee or teacher number, national insurance number and contact details)
- 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)
- Information relevant to the School Workforce Census
- Relevant medical information and details of your emergency contact
- Payroll information
- CCTV images
- Information relating to performance of paid staff
- declarations about suitability to work relating to the Childcare (Disqualification) regulations
- photographs (work related images or for your staff lanyard)
- Videos, audio and/or digital recordings (for presentations to staff/pupil/parent body/trustees/governors)
- documents created as a result of any disciplinary, capability, complaint and grievance procedures
- car registration details

### **Why we collect and use workforce information**

We use workforce data to:

- a) enable the development of a comprehensive picture of the workforce and how it is deployed
- b) inform the development of recruitment and retention policies
- c) enable individuals to be paid
- d) carry out staff appraisals
- e) to keep you and everyone at the school safe and secure
- f) to ensure we treat everyone equally and fairly
- g) to comply with employment law and our employment policies
- h) employment checks such as the right to work in the UK
- i) allowing better financial modelling and planning

Agape MAT document: This is a Trust document which means it must be followed by all schools in Agape MAT.

- j) to provide curricular or pastoral information to our staff, parent and/or pupil bodies, trustees or governors

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

- for the purposes of c, d, e, f, g and h processing is necessary for compliance with a legal obligation to which the controller is subject (Article 6 – 1 (c)) ;
- For the purposes of e processing is necessary in order to protect the vital interests of the data subject or of another natural person (Article 6 – 1 (d)) ;
- For the purposes of a to J inclusive processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Article 6 - 1(e));
- For the purposes of a – I inclusive processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child (Article 6 1 (f)).

We will, on occasion, need to process special category personal data (concerning health, ethnicity and/or trade union membership). These reasons include:

- a. enable the development of a comprehensive picture of the workforce and how it is deployed
- b. inform the development of recruitment and retention policies
- c. to keep you and everyone at the school safe and secure
- d. to ensure we treat everyone equally and fairly

Concerning any special category data:

- the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, (Article 9 (2) (a) ) UK GDPR - Article 9 or;
- 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 (Article 9 (2) (b)) (A and B above); or
- Article 9 – 2g reasons of substantial public interest (with a basis in law). Under Schedule 1 of the DPA 2018 we rely on:

Ground 8 – equality of opportunity and/or treatment (D above)

Ground 10 – preventing or detecting unlawful acts (C above)

Ground 16 – support for individuals with a particular disability or medical condition (C above)

### **Collecting workforce information**

We collect personal information via you, application forms and documents completed as part of absence management/appraisal processes.

Staff members personal data is only sought from the data subject. No third parties will be contacted to obtain staff members' personal data without the data subject's consent.

Staff members' personal data may be obtained and processed from third parties where the law requires the trust/school, to do so, e.g. medical records from a GP. The categories of data obtained and processed from third parties include:

- Recruitment agencies
- Teacher Pensions
- Berkshire Pensions
- Department for Work and Pensions
- HMRC
- HM Courts and Tribunal Service

Workforce data is essential for the Trust'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 our trust website or the websites of the schools within our trust.

### **Who we share workforce information with**

We routinely share this information with:

- our local authority (where applicable)
- the Department for Education (DfE)
- our payroll provider
- our HR provider
- occupational health provider
- within the Agape MAT

### **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.

We are required by law to pass on some personal information to our Local Authority and the Department for Education as well as:

- HMRC
- Teacher/Berkshire Pensions
- Department for Work and Pensions
- Disclosure and Barring Service

### **Department for Education (DfE)**

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 the Department for Education (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:

[dpo@altwoodschool.co.uk](mailto:dpo@altwoodschool.co.uk) (Employees who work at Altwood Church of England School)

[dpo@piggottschool.org](mailto:dpo@piggottschool.org) (Employees who work at The Piggott School)

[dpo@agapetrust.co.uk](mailto:dpo@agapetrust.co.uk) (Employees who work predominantly for the Agape Multi-Academy Trust)

You also have the right to:

- to ask us for access to information about you that we hold
- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to 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 the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

### **Withdrawal of consent and the right to lodge a complaint**

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, as appropriate:

[dpo@altwoodschool.co.uk](mailto:dpo@altwoodschool.co.uk) (Employees working at Altwood Church of England School)

[dpo@piggottschool.org](mailto:dpo@piggottschool.org) (Employees working at the Piggott School)

[dpo@agapetrust.co.uk](mailto:dpo@agapetrust.co.uk) (Employees working predominantly at the Agape Multi-Academy Trust)

### **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 in June 2024.

### **Contact**

If you would like to discuss anything in this privacy notice, please contact:

[dpo@altwoodschool.co.uk](mailto:dpo@altwoodschool.co.uk) (Employees working at the Altwood Church of England School)

[dpo@piggottschool.org](mailto:dpo@piggottschool.org) (Employees working at the Piggott School)

[dpo@agapetrust.co.uk](mailto:dpo@agapetrust.co.uk) (Employees working predominantly at Agape Multi-Academy Trust)

## 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's (DfE) 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>