

## **Privacy notice for the school workforce employed or otherwise engaged to work at Coombe Wood School.**

**This document gives you detailed information about how we use your personal data and complies with the EU General Data Protection Regulations. The latest version of this privacy notice is available on our web site.**

Your privacy is critically important to us. We follow a few fundamental principles as to how we use data:

- We are thoughtful about the personal information that we ask you to provide.
- We carefully consider the ways that we use and store your personal information.
- We share your data only when we need to.
- We take steps to ensure that the organisations with whom we share your information understand that your privacy is critically important.
- We aim to store personal information for as long as we have a reason to keep it and not longer than this.
- We believe in full transparency on how we gather, use, and share your personal information.
- We never sell your personal data to anyone.

### **1 - Whose data do we process?**

We process personal data relating to those that we employ to work at our school, and those who are otherwise engaged to work at our school. We may also receive data about employees from a variety of sources including past employers.

### **2 - Why do we process your data?**

Some of the reasons listed below overlap and there may be several grounds which justify our use of your data.

We carry out the task of providing education, which is in the public interest and it would be impossible to provide employment, educate and care for pupils or to safeguard pupils at the school, if we could not process key information relating to our employees.

- Schools have many legal obligations and in some cases, we must process key information about our employees to comply with those legal obligations.
- It may also be a requirement under an employee's contract of employment to process data in relation to that employee.
- If we did not process data about our employees, we would be able to educate children, manage our school, employ staff at our school or meet legal obligations on us.

In addition to this, we may contact employees in relation to extra-curricular events related to school life and have a legitimate interest in doing so. These events are run to add to the life of the school and to develop teamwork and morale. We may also display photographs of past employees within the school buildings as we have a legitimate interest in preserving the history and culture of the school and creating a suitable educational environment for our pupils and employees.

Less commonly, we may use your personal information where you have given us consent to do so. Where consent has been given, it can be withdrawn at any time.

Your data is processed for the following reasons:

- Supporting and managing you and your performance as an employee of the school
- Facilitating safer recruitment practices as part of our obligations to safeguard pupils
- Assisting in the running of the school
- Enabling you as an employee to be paid for your work
- Allowing financial modelling and planning
- Complying with the law on data-sharing
- Informing our recruitment and retention policies
- Supporting the work of the School Teachers' Review Body

We also use CCTV for security and the prevention of crime.

The data that we require about you includes some sensitive data.

*Sensitive data that we **must** know about*

As a school, we operate in the public interest to educate children and it is on this basis that we process some types of sensitive data, such as health-related information and previous convictions.

- We must be certain that you are able to perform in your role within the school and must process health-related information about employees to enable us to do that.
- We must also provide the right level of care and support for all of our pupils and ensure that they are safe. The data that we require about you includes some sensitive data, which you **must** tell us about, for example, about criminal convictions or police cautions.
- If we were unable to store or process this information, we would be unable to assess your suitability to work with children and we would be unable to ensure the safety of our pupils.

*Sensitive data that you **do not have to share** with us*

- Some sensitive data is shared with us **optionally** e.g. ethnicity.
- This data is held and processed only because you have agreed to share this data with us.
- You can change your mind at any time and you can request for it to be deleted.

### **3 - What data do we process about you?**

The personal data that we hold about you may include:

- Personal details, including names, photograph, date of birth and National Insurance number
- Personal characteristics such as gender, marital status, ethnic group, religion, disability, medical impairments, safeguarding self-declaration, trade union membership and DBS status. **Information about your ethnicity or religion or trade union membership is optional and you can ask for this information to be removed from our files.**
- Next of kin and emergency contact details
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records and tax status
- Employment contracts and remuneration details
- Qualifications and employment records including job history, job titles, working hours, training records and professional memberships
- Attendance and absence information as well as performance and disciplinary records
- Copies of identification documents such as driving licence or passport
- CCTV footage and data about your use of our ICT systems
- Biometric data in the form of a numerical code that represents your fingerprint to enable you to use our cashless catering service. **This data is optional. This data is not shared externally and is held within the school on school systems. If you prefer, you can be issued with a code or card to use our cashless catering service.**

### **4 - How do we routinely share your data?**

The table below summarises how your data may be shared with third parties on a routine basis,

including which data is shared and why it is shared.

Who Data is Shared With	What Data is Shared	Reason for Sharing
Payroll Provider - Dataplan	Name, date of birth, home address, email address, National Insurance number and bank account information.	To pay staff and manage pensions contributions
Auditors	Variable depending on the nature of the auditor's requests	Auditors may access staff records during the course of an audit
Occupational Health Provider - Maitland Medical	<p>Name, date of birth, home address, email address, gender, telephone number, role, department, start date.</p> <p>If a referral is made to occupational health due to a medical condition, then we will also share details about the nature of the medical condition or disability and the employee's absence record.</p>	To ensure that staff are able to perform in their roles appropriately
Department for Education (DfE)	Name, date of birth, role, start date, leaving date, ethnicity, disability, gender, qualifications, National Insurance number, hours of work, weeks per year, teacher reference number, salary, number of teaching hours, subject and absences.	<p>To meet legal requirements to submit an annual workforce return.</p> <p>We are required to share information about our school employees with the (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.</p> <p>The DfE uses this data for various purposes including:</p> <ul style="list-style-type: none"> <li>• Improving the management of school workforce data across the sector;</li> <li>• Enabling a comprehensive picture of the workforce and how it is deployed;</li> <li>• Informing the development of recruitment and retention policies;</li> <li>• Allowing better financial modeling and planning;</li> <li>• Enabling ethnicity and disability monitoring; and</li> <li>• Supporting the work of the School Teachers' Review Body.</li> </ul> <p>More information <a href="https://www.gov.uk/data-protection-how-we-collect-and-share-research-data">https://www.gov.uk/data-protection-how-we-collect-and-share-research-data</a></p>

Who Data is Shared With	What Data is Shared	Reason for Sharing
Homework Management Provider	Name, email address, role and timetable	To enable parents and carers, pupils and teachers to track pupils' homework and to provide the school with analysis to assess pupil progress
School Photograph Provider	Visual image	To provide school photographs
School Management Information System Provider - CAPITA SIMS	SIMS provides our school system that holds most of our pupil data and some data about staff. This is a cloud-based service which is hosted by SIMS.	To manage and run the school
Internet and Network Resources Provider - London Grid for Learning	Name, date of birth, gender, email address, telephone number	To enable the school network to operate and for the provision of internet-based services
School Trip Management Provider - EvolveVisits by eduFocus	Name and other details appropriate for school trips	To administrate school trips and visits
London Borough of Sutton - Health & Safety	Name of staff member who administered first aid after an accident; name of staff member who was involved in an accident	To track incidents where an accident form was completed after an incident involving a pupil/employee
Travel companies	Name, date of birth, passport details if relevant, medical issues, dietary requirements, next of kin contact details	To administrate school trips and visits
Sports events management provider	Name and year group	To administrate sporting events for school pupils
Parents' evening system provider	Name, year group/subject information	To enable parents and carers to book appointments with teachers
Google - file sharing and teaching and learning	Name, email address	To provide pupils and staff with an online learning environment
Teacher training colleges	Audio and/or visual images or recordings	To provide material for colleges to assess the quality of teaching by teachers who are training within our school
Prospective employers/recruitment agencies - for the purposes of providing references	Name, role salary, employment dates, absence record (upon appointment), any other information in order to comply with safer recruitment requirements	To co-operate with prospective employers/agencies recruitment procedure
Advertising avenues for recruitment (such as TES/Reed/InTouch)	Name of HR contact, line/senior manager of role advertised, role, contact details	To facilitate a positive recruitment procedure

In certain exceptional cases, for example, where there may be allegations against an employee, or other particular circumstances, we may share information as summarised below.

## INFORMATION SHARING IN EXCEPTIONAL CASES

Who Data is Shared With	What Data is Shared	Reason for Sharing
Local Authorities - Social Services	Employee name and other information depending on the concern	To follow safeguarding procedures where there are concerns about an employee
Police Services	Employee name and other information depending on the concern	To follow safeguarding procedures where there are concerns about an employee; To comply with a proper written request from a law enforcement agency where non-disclosure may prejudice their investigation
Legal Advisors	Employee name and other information depending on the concern	To gain advice, undertake a legal case or to assist an inquiry or investigation to which the school is a party
Regulators (such as OFSTED or ICO)	Information depending on the concern or line of enquiry	To co-operate with regulators or inspectors
Disclosure and Barring Service	Employee name and other information depending on the concern	To follow safeguarding procedures where there are concerns about an employee

**We do not share information about you with any third parties that are not listed above without your consent - unless the law requires us to do so.**

### 5 - Where is my data stored?

Some of the data we process is stored on school systems only. Our network providers are LGFL and Atomwide; together they are responsible for ensuring security and safety of our managed network. Some data may be stored on the systems of organisations that we share data with, which includes cloud-based service providers. As a school, we enquire from those that we share data with about the processes and policies that providers have in place to ensure that data held on their systems is protected, including where data is transferred outside of the European Economic Area (EEA). There may be international transfer of your data where our suppliers use systems that are hosted in data centres abroad but we always endeavour to ensure that the appropriate privacy protection is in place.

### 6 - How can I see what data you hold about me?

You have a right to access personal information that we hold about you and can do this by contacting the Data Protection Officer.

Miss Sabin Qureshi  
Data Protection Officer  
Folio Education Trust c/o Park Hill Junior School  
Stanhope Road  
Surrey CR0 5NS  
Email: [squireshi47@suttonmail.org](mailto:squireshi47@suttonmail.org) Tel: 0203 011 2767

The data controller responsible for processing your personal data is Folio Education Trust:

Mr Jonathan Wilden  
Executive Head-teacher  
Folio Education Trust c/o Park Hill Junior School  
Stanhope Road  
Surrey CR0 5NS  
Email: [jwilden1@suttonmail.org](mailto:jwilden1@suttonmail.org)

## **7 - For how long do you store data about me?**

We follow the guidance of the Information & Records Management Society (IRMS) in determining our data retention policies, although there may be cases where we deviate from this if there is a valid reason. Please contact our Data Protection Officer for further information.

## **8 - What rights do I have regarding my personal data?**

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances. If you would like to make a request, please contact our data protection officer.

Additionally, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

## **9 - How do I exercise my rights or make a complaint?**

We take complaints seriously. Please contact our Data Protection Officer if you wish to exercise your rights or wish to make a complaint about data-handling. You may also approach the Information Commissioner's Office ([ico.org.uk/concerns](http://ico.org.uk/concerns) or Tel: 0303 123 1113) with your concern.

## **10 - 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

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