



# Northwick Park Multi Academy Trust Privacy Notice



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## (How we use school workforce information)

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~~[Suggested wording to make available to those employed to teach, or otherwise engaged to work, at a school or a local authority to explain how you use their personal information]~~

### The categories of school workforce information that we collect, process, hold and share include:

- personal information (such as name, employee or teacher number, national insurance number, address)
- special categories of data including characteristics information such as gender, age, ethnic group
- 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)
- Relevant medical information
- Pay role information (such as bank account details)

~~[Schools / local authorities need to add to this list other categories of workforce information that they collect, hold and/or share, for example; relevant medical information, addresses, and other payroll information.]~~

### Why we collect and use this information

We use school workforce data to:

- enable the development of a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- enable individuals to be paid
- support staff with on-going medical needs
- support the continual development of staff

~~[Schools / local authorities need to add to this list all other reasons for which they collect and use workforce information]~~

### The lawful basis on which we process this information

We process this information under

Article 6

EU GDPR

"Lawfulness of processing"

1. Processing shall be lawful only if and to the extent that at least one of the following applies:

- (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- (b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- (c) processing is necessary for compliance with a legal obligation to which the controller is subject
- (e) 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 9

EU GDPR

"Processing of special categories of personal data"

1. Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation **shall be prohibited**.

2. Paragraph 1 shall not apply if one of the following applies:

(a) the data subject has given **explicit consent** to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;

(b) 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 in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;

(c) processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;

(h) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services **on the basis of Union or Member State law or pursuant to contract** with a health professional and subject to the conditions and safeguards referred to in paragraph 3;

**The Education Act 1996 – this information can be found in the guide documents on the following website**  
<https://www.gov.uk/education/data-collection-and-censuses-for-schools>

## Collecting this information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

## Storing this information

We hold school workforce data for

o Accident Records: Minimum of 3 years since the last entry, or if it involves a child until they reach 21.

o Income Tax and NI: Minimum of 3 years from the end of the financial year to which they relate.

o Maternity and Paternity: Minimum of 3 years from the end of the tax year in which the leave ends.

o Salary and Pay: Minimum of 6 years.

o Working Time: 2 years.

o Application and Recruitment Records: 6-12 months.

o Parental Leave: 5 years from birth or adoption, or 18 years if the child receives a disability allowance.

o Pension Benefits: 12 years from the ending of any benefit payable.

o All Personnel Files and Training Records: 6 years from the end of employment.

o Redundancy Records: 6 years.

o Sickness Absence Records: A minimum of 3 months but potentially up to 6 years after employment ends.

**[schools/ local authorities need to include the length of time for which the personal data will be stored]**

## Who we share this information with

We routinely share this information with:

- our local authority
- the Department for Education (DfE)
- the Multi Academy Trust

**[Settings need to amend and extend this list to include all other parties with whom they regularly share information. For example, academy chains / federations / Multi Academy Trusts (MATs). Once stated you also need to explain why you share the data and what makes it lawful below]**

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## Why we share school workforce information

We do not share information about workforce members with anyone without consent unless the law and our policies allow us to do so.

### ~~Local authority [for use by schools only – delete if not appropriate]~~

~~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.

### ~~[For use by maintained schools only:]~~

~~We are required to share information about our school employees with our local authority (LA) and the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.~~

### ~~[For use by academies and free schools only:]~~

We are required to share information about our pupils with the (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

### Multi Academy Trust

We share personal data within our Multi academy trust to ensure the continual support for and development of staff, the school and the Trust. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding / Academy expenditure.

### ~~[For use by pupil referral units only:]~~

~~We are required to pass information about our pupils to the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.~~

## Data collection requirements

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>

## 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

~~[include details of administrator / data protection officer]~~ Mrs E. Lane

Mrs T Smith

Northwick Park Academy

Leigh Beck Academy

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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
- claim compensation for damages caused by a breach of the Data Protection regulations

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/>

## Further information

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

Mrs E. Rising

Mrs T Smith

Northwick Park Academy

Leigh Beck Academy ~~[Insert name and / contact~~

~~details of your administrator / data protection officer~~