



## Privacy Notice: Workforce

### **WHY DO WE COLLECT AND USE WORKFORCE INFORMATION?**

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The CSIA Trust is a data controller for the purposes of the General Data Protection Regulation (GDPR). The GDPR defines what is meant by 'personal data', places obligations on data controllers and creates principles relating to the processing of personal data. This privacy notice explains how we collect, store and use personal data about individuals that we employ, or engage to work at our school.

#### **The categories of workforce data that we collect, hold and share include:**

- personal information (such as name, employee and teacher number, national insurance number)
- recruitment information collected as part of the application process
- 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)
- performance information
- absence data
- Photographs including CCTV images
- outcomes of disciplinary or grievance procedures

#### **We use workforce data to:**

- to support student learning
- support effective performance management
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing
- enable individuals to be paid
- facilitate safer recruitment practices
- provide the Government with workforce census data
- comply with the Academies Financial Handbook requirements in reporting

#### **Our lawful basis for using this data**

The most common basis for using workforce personal information is most commonly to:

- Fulfil a contract we have entered into
- Comply with our legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have provided consent

- We need to protect your vital interests (or somebody else's)
- We have legitimate interest in processing the data; for example fraud or crime detection or prevention

### **Collecting workforce information:**

Whilst the majority of workforce information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain information to us or if you have a choice.

### **Storing workforce data**

We create and maintain an employment file for each staff member. The information contained in this file is kept secure.

Once your employed with us has ended, we will retain this file and delete the information in it in accordance with our data retention schedule.

## **WHO DO WE SHARE WORKFORCE INFORMATION WITH?**

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Commonly shared workforce information includes:

- The Department for Education (DfE) (legal obligation)
- Other academies within our MAT (contractual obligations, public task)
- Local authority – disclosure and barring service (legal obligation)
- Pension providers (contract)
- Service providers where contracted out eg, payroll (contract)
- Health and social welfare organisations (legitimate and vital interest)
- Police forces and courts (public task, vital interest)
- Employment and recruitment agencies (consent, legal obligation)
- Our auditors (legal obligation, public task)

### **Why we share workforce information**

We do not share information about our workforce with anyone without consent unless the law and our policies allow us to do so. Lawful basis for sharing the information above is shown in brackets ( )

#### **Department for Education**

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. This data sharing underpins workforce policy monitoring, evaluation and links to school funding/expenditure and the assessment educational attainment.

We are required to share information about our workforce with the Department for Education (DfE) for the purpose of those data collections, under section 5 of the Education (Supply of Information and 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](#).

## **REQUESTING ACCESS TO YOUR PERSONAL DATA HELD BY THE CSIA TRUST**

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

To make a request for your personal information, or be given access to your child's educational record, contact the Trust Data Protection Officer

Depending on the lawful basis above, you may 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

### **Complaints**

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance. Alternative, 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 Mrs B Lawrence (Data Protection Officer) via the school

*This notice is based on the Department for Education's model privacy model for Workforce, amended for workforce within The CSIA Trust and to reflect the way we use data in this school.*

*We may need to update this privacy notice periodically so we recommend you revisit this information from time to time. This version was last updated **March 2020***