



NOWER HILL HIGH SCHOOL

Privacy notice for staff

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our school. It is based on the Department for Education's model privacy notice for the school workforce, amended to reflect the way we use data in this school.

We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of any contract of employment or other contract to provide services and we may update this notice at any time.

We, Nower Hill High School, George V Avenue, Harrow, HA5 5RP are the 'data controller' for the purposes of data protection law.

Our data protection officer is Craig Stilwell, Judicium Consulting Limited (see 'Contact us' below).

The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- DBS information to demonstrate compliance with Keeping Children Safe in Education (actual certificates are not retained).
- Criminal records information as required by law to enable you to work with children
- Performance information

- Details of your appraisals, performance reviews and capability issues
- Details of your time and attendance records
- Information about the use of our IT, communications and other systems and other monitoring information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Accident reporting and records relating to accident/injury at work
- Copy of driving licence where authorized School Minibus Driver
- Photographs
- CCTV footage
- Data about your use of the school's information and communications system
- Details in references about you that we give to others

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Health, including any medical conditions, and sickness records

Why we use this data

The purpose of processing this data is to help us run the school, including to:

- Enable you to be paid
- Comply with employment law obligations
- Facilitate safe recruitment, as part of our safeguarding obligations towards StudentStudents
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body

Our lawful basis for using this data

We process this information under the Employment Rights Act 1996, the Trade Union and Labour Relations (Consolidation) Act 1992, The Agency Workers Regulations 2010, the Employment Acts 2002 and 2008, the Employee Relations Act 1999, the Equality Act 2010, and all other relevant employment related legislation.

We may also process this information with consent where appropriate and to establish, exercise and defend legal claims

Most commonly, we use it where we need to:

- To determine recruitment and selection decisions on prospective employees

- To carry out effective performance of the employees contract of employment and to maintain employments records
- To carry out vetting and screening of applicants and current staff in accordance with regulatory and legislative requirements
- Fulfil a contract we have entered into with you
- Comply with a legal obligation including the submission of the School Workforce Census to the DfE.
- Carry out a task in the public interest

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

- You have given us consent to use it in a certain way for example accessing staff benefits such childcare vouchers.
- We need to protect your vital interests (or someone else's interests)

How We Use Particularly Sensitive Information

Sensitive personal information (as defined under the GDPR as 'special category data') require higher levels of protection and further justification for collecting, storing and using this type of personal information. We may process this data in the following circumstances:

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations in line with our data protection policy
- Where is it needed in the public interest, such as for equal opportunities monitoring (or in relation to our pension scheme)
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards. Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

How we store this data

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our [Information and Records Management Society's toolkit for schools](#)

Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- Harrow Council - We are required to share information about our workforce members with our local authority under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.
- Department for Education (DfE) - 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.
- Ofsted
- Other schools within the Collegiate
- Your family or representatives
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll
- Financial organisations including the School's bankers to enable processing of payroll.
- Our auditors - to meet the requirements of the Academies Financial Handbook and the Academies Accounts Direction.
- Trade unions and association
- Occupational Health
- Professional advisers and consultants
- Training providers
- Police forces, courts, tribunals
- Professional bodies
- Employment and recruitment agencies

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 Student 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>

How to access personal information we hold about you

Under data protection legislation, you have the right to request access to information about you that we hold. If you would like to make a request, please contact our Data Protection Officer.

Your Rights of Access, Correction, Erasure and Restriction

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

- Access your personal information (commonly known as a 'subject access request'. This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.
- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances (for example for direct marketing purposes)
- To transfer your personal information to another party

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

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

Judicium Consulting Limited

Address: 72 Cannon Street, London, EC4N 6AE

Email: dataservices@judicium.com

Web: www.judiciumeducation.co.uk

Telephone: 0203 326 9174

Lead Contact: Craig Stilwell

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