Privacy Notice (How We Use Workforce Information)

This Privacy Notice has been adopted by all schools within The Golden Thread Alliance – Culverstone Green Primary School, Fleetdown Primary Academy, Meopham Community Academy, Oakfield Primary Academy, Riverview Infants School, Riverview Junior School, Temple Hill Primary Academy, West Hill Primary Academy and Wrotham Road Primary School.

This Privacy Notice for academy workforce explains how and why we store personal information about those employed by the Trust or otherwise engaged to work at the school. It provides a guide to our legal obligations and their own rights. Like any organisation which handles personal data, our Trust is the 'Data Controller' as such, we are registered with the ICO (Information Commissioner's Office) and we comply with UK General Data Protection Regulation (UK GDPR).

The Categories of Workforce Information That We Process Include:

Personal Information	Name, date of birth, gender, address, email address, telephone number, marital status National Insurance number Employee or teacher number Medical conditions
Characteristics	Ethnicity, language, nationality, country of birth
Attendance Information	Sessions attended, number of absences, reasons for absence
Employment/Recruitment/ Contract Information	References Self-Disclosure forms DBS checks Verification of the right to work in the UK Start dates Hours worked Post / roles Salary information P45 forms Pensions information
Other	Appraisal / Performance Management notes and reports Qualifications DBS evidence Disciplinary information Grievances Emergency contact information such as names, relationships, phone numbers, email addresses Details of any dependents Trade Union membership Images of staff captured by a school's CCTV system Recording of staff from the Trust's video conferencing platform

This list is not exhaustive, to access the current list of categories of information we process, please contact Claire Misy, Claire.misy@golden-thread.org.

Why We Collect and Use Workforce Information

We use workforce data to:

- Enable the deployment 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
- Provide support to staff when required (e.g. medical emergencies)
- Maintain high standards of performance from the workforce
- Where we need to perform the contract we have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests, rights and freedoms do not override those interests.

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

(6a) Consent: employees and others who work in the Trust and its schools have given clear consent for us to process their personal data for the purposes indicated above.

(6c) A Legal obligation: the processing is necessary for us to comply with the law.

(6d) A duty to safeguard pupils: the processing is necessary in order to protect the vital interests of the data subject (children); (e.g. we are required to have evidence that staff have DBS clearance).

(6e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.

The lawful bases for processing personal data are set out in Article 6 of the UK General Data Protection Regulation.

Special Categories of data are set out in Article 9 of the UK General Data Protection Regulation. The Golden Thread Alliance will work within the conditions of GDPR - Article 9 of the UK GDPR:

(9.2a) explicit consent. In circumstances where we seek consent, we make sure that the consent is unambiguous and for one or more specified purposes, is given by an affirmative action and is recorded as the condition for processing. Examples of our processing include staff dietary requirements, and health information we receive from our staff who require a reasonable adjustment to access our site and services.

(9.2b) 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.

(9.2c) where processing is necessary to protect the vital interests of the data subject or of another natural person. An example of our processing would be using health information about a member of staff in a medical emergency.

(9.2f) for the establishment, exercise or defence of legal claims. Examples of our processing include processing relating to any employment tribunal or other litigation.

(9.2g) reasons of substantial public interest. As a Trust, we are a publicly funded body and provide a safeguarding role to young and vulnerable people. Our processing of personal data in this context is for the purposes of substantial public interest and is necessary for the carrying out of our role. Examples of our processing include the information we seek or receive as part of investigating an allegation.

(9.2h) for archiving purposes in the public interest. The relevant purpose we rely on is Schedule 1 Part 1 paragraph 4 – archiving. An example of our processing is the transfers we make to the archives as set out in our Data Retention Policy.

We process criminal offence data under Article 10 of the UK GDPR.

Our Data Protection Policy highlights the conditions for processing in Schedule 1 of the Data Protection Act 2018 that we process Special Category and Criminal Offence data under.

Collecting Workforce Information

We collect personal information via application forms, but we will also collect information from you in a number of different ways. This could be through your personnel records, the Home Office, pension administrators, your doctors, from medical and occupational health professionals we engage, the DBS, your trade union, other employees, other professionals we may engage (e.g. to advise us generally), automated monitoring of our websites and other technical systems such as our computer networks and connections, CCTV and access control systems, remote access systems, email and instant messaging systems, intranet and internet facilities.

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 and we will tell you what you need to do if you do not want to share this information with us.

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 the Trust's website where the Data Retention Policy is readily available.

Who We Share Workforce Information With

We routinely share aspects of workforce information with:

- The Secretary of State
- The Department for Education (DfE)
- The Academy Trust and other schools within the Trust
- Ofsted;
- Prospective Employers;
- Welfare services (such as social services);
- Law enforcement officials such as police, HMRC;
- Office for National Statistics;
- Police CyberAlarm
- LADO;
- Training providers;

- Professional advisors such as lawyers and consultants;
- Support services (including HR support, insurance, IT support, information security, pensions and payroll, Microsoft and Cantium);
- Gridserve;
- The Local Authority;
- Occupational Health;
- DBS;
- Recruitment and supply agencies; and
- The SDS Group

Why We Share Academy 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.

Secretary of State
We are required to share information about our workforce members with the Secretary of State under section 7 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Department for Education
The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections.

We are required to share information about our school employees with the (DfE) under section 7 of the Education (Supply of Information about the 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.

For more information, please see 'How Government uses your data' section.

Suppliers and Service Providers
We are required to share certain information about our school workforce with suppliers and service providers (e.g. pensions information) to enable staff to undertake the legal responsibilities of their role.

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 Claire Misy, Chief Operating and Financial Officer, Claire.misy@golden-thread.org.

Depending on the lawful basis used for processing data (as identified above), you may also have the right to:

- have your personal data rectified if it is inaccurate or incomplete;
- request the deletion or removal of personal data where there is no compelling reason for its continued processing;
- restrict our processing of your personal data (i.e. permitting its storage but no further processing);
- object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics; or
- not 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 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 Claire Misy, Chief Operating and Financial Officer, Claire.miy@golden-thread.org.

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 on September 2023.

Contact

If you would like to discuss anything in this privacy notice, please contact: Claire Misy, Chief Operating and Financial Officer, Claire.misy@golden-thread.org.

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/academy 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 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

The Department may share information about academy employees with third parties who promote the education or well-being of children or the effective deployment of school/academy 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.

How to Find Out What Personal Information DfE Hold About You

Under the terms of the Data Protection Act 2018, you're entitled to ask the Department:

- 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, you should make a 'subject access request'. Further information on how to do this can be found within the Department's 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: https://www.gov.uk/contact-dfe