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'Every child, every chance, every day'
'Pob plentyn, pob cyfle, pob dydd'

YSGOL BRYNFFORDD PRIVACY NOTICE FOR OUR WORKFORCE

Policy Number	Document Version	Date Reviewed	Date of Next Review
YBGD14A	V2	October 2019	June 2020

To meet the requirements of the Data Protection Act 2018 and GDPR, schools are required to issue a Privacy Notice to the school workforce summarising the information held on record about them, why it is held, and the third parties to whom it may be passed on. This Privacy Notice provides information about the collection and processing of staff personal information by Ysgol Brynffordd from application until cessation of employment. The school workforce includes all those employed to teach, or otherwise engaged to work, either on a paid, contracted or voluntary basis, at the Alun School.

The Information Commissioner's Office (ICO) is the Regulator for how personal information is used. They have the powers to enforce Data Protection legislation. If you have any concerns they will provide advice and will handle any complaints, you may have. Advice and guidance is available via their website www.ico.org.uk

The Governing Body For the purposes of the General Data Protection Regulations and the Governing Body is recognised as The Data Controller (further information about the roles of the Data Controller are available from the ICO) and is ultimately responsible for how information is collected used and shared. It is also responsible for implementing advice and guidance issued by the DPO. The Chair of Governors may be contacted c/o Mrs Niki Prytherch bfmail@hwbmail.net

The Headteacher is responsible for the day to day management of how personal information is collected, used and shared.

Data Protection Officer (DPO) The school has a Data Protection Officer who is independent from the school and provides advice to the school and The Governing Body on complying with privacy and data protection legislation (the General Data Protection Regulation and Data Protection Act 2018). Our Data Protection Officer is provided by an independent consultancy. If you have any questions he may be contacted via www.gdbr.co.uk or david@gdbr.co.uk

Why we collect and use this information

We use school workforce data to:

- enable individuals to be paid
- facilitate safe recruitment
- support effective performance management
- enable the development of a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- allow better financial modelling and planning

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 history and proof of identity and right to work)
- 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) and relevant medical information
- qualifications (and, where relevant, subjects taught)
- photographic records

The lawful basis on which we process this information

We process this information under the Data Protection Act 2018 and GDPR according to guidance published by the Information Commissioner's Office and the Department for Education.

Under Article 6 of the GDPR, the lawful basis for processing school workforce information is to fulfil contractual obligations and other legitimate interests. For data collection purposes (Departmental Censuses) provisions of the Education Act 1996 will be followed. 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.

Who we share this information with and why

We routinely share this information with:

- our local authority, Flintshire County Council
- the Department for Education (DfE)
- The Welsh Government

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

We are required to share information about our workforce members with our local authority (LA), Flintshire County Council, under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Department for Education (DfE) & Welsh Government

We share personal data with the Department for Education (DfE) and the Welsh Government on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding / expenditure and the assessment educational attainment.

Data collection requirements

The DfE and Welsh Government collects and processes personal data relating to those employed by schools (including Multi Academy Trusts), local authority employees that work in state funded schools (including all maintained schools, all academies, 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.

The School Workforce Annual Census Privacy notice can be found here:

<https://gov.wales/school-workforce-annual-census-swac-privacy-notice>

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-andcensuses-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 and Wales 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 the DfE & WG releases personal data to third parties is 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 we look after your information and store it

Under the General Data Protection Regulations, we must to protect any information that we collect from you. We take measures to safeguard your data and apply security standards and controls to prevent any unauthorised access to it. Information which you have provided will be stored securely. It will only be used for the purpose(s) stated when the information was collected. We hold school workforce data throughout your period of employment and for 6 years after the cessation of your employment. Personal information that is no longer needed, or has become inaccurate or out of

date, is disposed of securely. For example, we will shred or incinerate paper-based records, and override electronic files. We may also use an outside company to safely dispose of electronic records.

Access to information and correction

Under the data protection Act you have a right to request a copy of some or all of your personal information we hold about you. We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. Please help us to make sure that we have identified you correctly by letting us know when you change address or name, and tell us if any of your information we hold is wrong. If you wish to request your information, update or correct your information please contact Mrs Niki Prytherch at bfmail@hwbmail.net

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 through Mrs. Niki Prytherch at bfmail@hwbmail.net

Alternatively, you can contact the Information Commissioner's Office at: <https://ico.org.uk/concerns/>

Recruitment and Safeguarding

Any personal information supplied during the application and recruitment process will be stored, used and/or processed as and when necessary by the school and Flintshire County Council for the purposes of carrying out their public function, for equal opportunities monitoring and for the prevention and detection of crime. Ysgol Brynffordd is committed to safeguarding and promoting the welfare of children and young people. All appointments will be subject to:

- An Enhanced Disclosure and Barring Service check
- Receipt of references, including your suitability to work with children
- Checks of professional status (GTCW, QTS, EWC etc)

Personal information will be collected for the purposes of recruitment and will not be used for any other purpose unless an offer of employment is made. We will hold your data securely for the required amount of time outlined in our data retention schedule, 6 months from the closing date of the application of the post. Disclosure of your personal data may take place and be given to external parties should they show reasonable cause for disclosure to be made and to the extent that the law allows.

Changes to our privacy policy

We keep our Privacy Policy under regular review and will publish any revisions on our website.

Data Protection Officer Welsh Government Cathays Park CARDIFF CF10 3NQ		Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF
Email Data.ProtectionOfficer@gov.Wales		Wales helpline: 029 20678400 www.ico.gov.uk
School Data Protection Officer GDBR Consultancy Ltd David Bridge david@gdbr.co.uk		Head Teacher Mrs Rachel Critchell Ysgol Brynffordd bfmail@hwbmail.net
		School Data Protection liaison Mrs Niki Prytherch bfmail@hwbmail.net