

Privacy Notice

How we use school workforce information

Under data protection law, individuals have a right to be informed about how Pathfinder Schools use 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 schools.

Pathfinder Schools is the Data Controller for the purposes of the General Data Protection Regulation 2018. This means that we collect, process and are responsible for, personal data about our workforce.

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)
- 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)
- performance management information
- medical information including disabilities
- information required to support the recruitment process including previous employment history, references and criminal convictions
- payroll information including P45, bank details and pension details
- emergency contact details
- vehicle, driving licence and insurance information
- photographs and where installed, CCTV images
- data about your use of school information and communication systems

Why we collect and use workforce 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
- enable occupational health referrals if required
- confirm suitability to work with children and young adults
- facilitate reasonable adjustments in the workplace

- contact persons in the event of emergency at work
- enable parking at our sites and the submissions of expense claims
- facilitate safeguarding and security of our sites
- ensure that our systems are appropriate and are being used effectively

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

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- 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
- We need to protect your vital interests (or someone else's interests)

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.

We also collect and process special category data such as race, ethnic origin, religion, health and biometric (fingerprint) data. This data is also necessarily collected and processed in order to carry out our obligations to provide public education. Where personal data or special category data is not essential to the fulfilment of our obligations (such as biometrics), we will seek your consent at the time the data is captured.

Collecting workforce information

We collect personal information via registration forms completed during recruitment then update them annually through a staff data collection form. From time to time, we will update the information based upon you provide to us in other forms.

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 UK GDPR, we will inform you at the point of collection whether you are required to provide certain school workforce information to us or if you have a choice in this.

Storing workforce information

We hold school workforce data for the duration of your employment with schools in our trust. After leaving the trust, we will retain your personnel file for 6 years after which it will be destroyed. There are some exceptions to this which are covered in our retention policy. Typically we hold your information in electronic form on our Management Information System and in manual files which are held in a secure area.

Who we share workforce information with

We routinely share this information with:

- our HR staff so that they may perform their duties and responsibilities
- Pathfinder Schools for consolidation of our employment information

- Our Management Information System provider so that we may fulfil our duties as employers via electronic means
- our local authority as part of our data sharing agreement
- the Department for Education (DfE) for school workforce census purposes
- HR provider for the purposes of contract generation and maintenance
- Payroll provider to facilitate payment to our workforce
- Teachers Pensions and Northamptonshire Local Government Pension Scheme to facilitate membership of pension schemes
- HMRC to complete tax and National Insurance returns
- Disclosure and Barring Service provider for employment checking eligibility
- Occupational Health provider for referrals
- Our trip/events software provider so that personal details are available to organisers remotely
- 3rd party event (typically training) providers usually dietary, disability or special assistance required in order to attend the event where the school makes the booking
- 3rd party service providers for such things as staff absence insurance or software providers to facilitate registration and use
- our auditors so the appropriateness of our actions is reviewed

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

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

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 children and young people with the Department for Education (DfE) for the purpose of those data collections, under section 5 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.

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 the Trust Information Officer at tio@pathfinderschools.org.uk

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

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 **the Trust Information Officer**.

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 in July 2023.

Contact

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

Trust Information Officer
Pathfinder Schools
Greening Road
Rothwell
Northants NN14 6BB

Email: tio@pathfinderschools.org.uk
Telephone: 01536 903399

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 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 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.

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>