



Pendle Vale College - Privacy Notice: School Workforce

Pendle Vale College is registered with the Information Commissioner's Office as Data Controller, registration number Z1606204.

The Data Protection Officer for Pendle Vale College can be contacted by email on r.wilson@pendlevale.lancs.sch.uk or on 01282 682240.

How we use school workforce information

The categories of school workforce information that we collect, process, hold and share include:

- personal information (such as name, address, date of birth, 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 (pay progression – teaching staff only)
- DBS disclosure information
- Payroll information (bank details – name, sort code, account number)
- Health or medical information linked to work absence
- CCTV – for the prevention and detection of crime, health and safety and safeguarding of all staff

Why we collect and use this 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 correctly
- to comply with termly workforce census returns to the DfE
- for long term budget planning purposes
- for health and safety purposes
- to comply with policies and procedures of the College

The lawful basis on which we process this information

On the 25th May 2018 the Data Protection Act 1998 will be replaced by the General Data Protection Regulation (GDPR). The condition for processing under the GDPR will be:

Article 6

1. Processing shall be lawful only if and to the extent that at least one of the following applies:



- (c) Processing is necessary for compliance with a legal obligation to which the controller is subject;
- (a) Processing is necessary following consent of the individual
- (e) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller

Article 9

1. Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.
2. Paragraph 1 shall not apply if one of the following applies:
 - (j) Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Education Act 2005 sections 113 and 114 - is a statutory requirement on schools and local authorities for the submission of the school workforce census return, including a set of individual staff records.

Add in here the legislation around the use of CCTV.

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.

Storing this information

We hold school workforce data in line with the IRMS Toolkit guidelines:

- Personal file: termination of employment + 6 years
- Appraisal/Performance Management records: current year + 5 years
- DBS Checks - copies of certificates: 6 months
- Oracle information: as per LA/HMRC/pension procedures
- MIS information: as per manual records +6 years after termination
- CCTV – 30 days unless required by the police for court proceedings

Who we share this information with

We share this information with:

- our Local Authority (LA)
- the Department for Education (DfE)
- Optima Health (LA)
- MIS – Bromcom/SIMS/FMS/TUCASI/LIVERREGISTER
- School IP



- Schools Business Services (SBS)
- Schools Advisory Service (SAS)
- Software Packages to support home and remote learning (as detailed below)
- EVERY
- Inventory
- Police
- Outdoor Education Providers
- National College/iHasco
- Copyright Licensing Agency
- Staff Absence Management (SAM)

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 (DfE)

We share personal data with the Department for Education (DfE) on a statutory basis. 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 school employees with our local authority (LA) and the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

MIS

The College uses Bromcom as the main MIS. Other associated and linked systems are SIMS/FMS for Finance/Salary monitoring, and Tucasi and Live Register for online payments and cashless catering.

SchoolIP

We share this information with SchoolIP as a Management Information System (MIS) that contributes to the development of an overview of the workforce and how it is deployed. This also assists with Performance Management assessments.

School Business Services (SBS)

We share information with SBS for budget planning – short and long term. This data sharing links to the effective management of school funds as per our statutory requirements with the LA.

Schools Advisory Services (SAS)

We share information with SAS as part of our staff insurance scheme. The data shared enables the College to claim for cover for staff absence and also to provide an additional wellbeing service to staff.

Software Packages to support home and remote learning

- Doodle/Kaboodle/CGP/PixL/Maths Pad/Dr Frost Maths/GCSE Pod/Kahoot/Maths Whizz/Seneca



Learning/Quizlet/Word Wall/Exampro/Testbase/Teaching Gadget/Textivate/Language Nut/IRIS

We share information with the above agencies to support teaching and learning.

EVERY

We share information with Every as part of health and safety training and compliance.

Inventry

We share information with Inventry for the signing in and out system for all staff and visitors. The data shared enables the college to fulfil its safeguarding functions and to support essential health and safety requirements such as evacuation procedures and protocols.

Police

We share this information with the Police following the receipt of the required documentation (DP1) in line with the prevention and detection of crime and public safety.

Outdoor Education Providers

We share information as part of our partnership with Duke of Edinburgh Scheme, Sports Leaders UK and Mountain Training Association.

National College/iHasco

We share basic information with the National College and iHasco to enable staff to access online CPD opportunities and webinars for their ongoing personal and professional development.

Copyright Licensing Agency

Basic information is shared to enable staff to access copyright material in order to support the learning of the students.

Staff Absence Management (SAM)

Information is shared to enable a more streamlined approach to managing staff absence and the implementation of statutory procedures.

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 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

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>

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 Mrs D Jenkins, Data Protection Officer in the first instance – dpo@pendlevalle.lancs.sch.uk.

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

Where consent has been used for the legal basis of processing information, you have the right to withdraw the consent at any time simply by notifying the College via the Data Protection Officer.

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/>

Further information

If you would like to discuss anything in this privacy notice, please contact the Data Protection Officer on r.wilson@pendlevalle.lancs.sch.uk or at Pendle Vale College, Oxford Road, Nelson, Lancs BB9 8LF.