

Hafod y Wern Community Primary School

Privacy Notice – School Workforce

How and why we use your information

We have a duty to process personal data relating to those people we employ to work at our school. This information is required for employment purposes to assist in the provision of education services, or to enable individuals to be paid. We have a legal obligation to collect and use this personal information as outlined in this privacy notice.

We may also process data under one of the following lawful bases:

- the requirement to fulfil a contractual obligation;
- the need to carry out a task in the public interest;
- the requirement to protect the vital interests of an individual;
- if there is a legitimate interest to process the data; or
- if the staff member has given consent for us to process their data in a certain way. This consent can be withdrawn at any time.

Information Collected:

- Personal information (such as name, date of birth, teacher number, National Insurance number, and address);
- Contract details (such as salary, working hours and start dates);
- Attendance information (such as sessions attended, number of absences and absence reasons);
- Absence information (such as the number of, and reasons for, any absences from school);
- Medical information (such as any allergies or required medication);
- Qualifications and subjects previously taught;
- Contact information (such as address, telephone number and email addresses, and emergency contacts);
- Special categories of data, such as ethnicity or membership of a trade union;
- Banking information (required for bank transfers);
- Performance information;
- Outcomes of any disciplinary and/or grievance procedures.

Why we collect and use this information

We use the collected data to:

- Enable the school workforce to be paid, and to support pension payment and calculations;
- Facilitate safe recruitment, to comply with safeguarding obligations;
- Enable sickness monitoring;
- Assist with the development of our recruitment and retention policies;
- Assist with financial modelling, planning and auditing;

- Contact staff outside of the school if required, or to contact others known to them where they have provided the information, when it would be reasonable to do so;
- Assess the overall effectiveness of the workforce, and review how efficiently it is being deployed;
- Support effective performance management;
- Support training needs and development of the school workforce.

We routinely share school workforce information with:

- Our Local Authority;
- School Effectiveness and Improvement Service for North Wales;
- Welsh Government;
- Regulatory bodies;
- Parents and pupils.

Why we share school workforce information:

We do not share information about our school workforce with anyone without consent unless the law and our policies allow us to do so.

We are required to share information about our school workforce with our Local Authority (LA) and the Welsh Government.

Data collection requirements:

To find out more about the data collection requirements placed on us by the Welsh Government (for example; via the school census) go to:

<https://gov.wales/data-collection-and-information-management-for-schools>

Welsh Government have also issued a Privacy Notice for individuals included in the School Workforce Annual Census (SWAC). To see the document, go to:

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

For more information about services for young people, please visit our local authority website: www.wrexham.gov.uk

To learn more about who the Local Authority share the staff workforce data with, go to: <https://www.wrexham.gov.uk/assets/pdfs/privacy/corporate-customer-services/human-resources-organisational-development.pdf>

We only use what we need

Where we can, we'll only collect and use the school workforce's personal information so that we can deliver education services or meet a requirement.

If we don't need this personal information, we'll either keep it anonymous if we already have it for something else or we won't ask for it. For example, in a survey we may not need contact details, we'll only collect survey responses.

If we use school workforce personal information for research and analysis, we'll always keep the data anonymous or use a different name unless the data subject has agreed that their personal information can be used for that research.

We don't sell personal information to anyone else.

What you can do with your information

The law gives school employees a number of rights to control what personal information is used by us, and also how it is used by us.

You can ask for access to the information we hold on you

We would normally expect to share what we record about you with you.

In line with current Data Protection legislation, school staff also have the right to ask for all the information we have about them. When we receive a request from you, we must give you access to everything we've recorded about you.

However, we can't let you see any parts of your record which contain:

- confidential information about other people; or
- information a professional thinks will cause serious harm to your or someone else's physical or mental wellbeing; or
- if we think that giving you the information may stop us from preventing or detecting a crime.

This applies to personal information that is in both paper and electronic records. If you ask us, we'll also let others see your record (except if one of the points above applies).

If you can't ask for your records in writing, we'll make sure there are other ways that you can. If you have any queries about access to your information, please contact: Mr Simon Edwards or Mrs Sarah Hudson, Hafod y Wern C.P. School, Deva Way, Wrexham LL13 9HD

You can ask to change information you think is inaccurate

You should let us know if you disagree with something written on your record.

We may not always be able to change or remove that information but we'll correct factual inaccuracies and may include your comments in the record to show that you disagree with it.

You can ask to delete information (right to be forgotten)

In some circumstances you can ask for your personal information to be deleted, for example where:

- your personal information is no longer needed for the reason why it was collected in the first place;
- you have removed your consent for us to use your information (where there is no other legal reason for us to use it);
- there is no legal reason for the use of your information;
- deleting the information is a legal requirement.

Where your personal information has been shared with others, we'll do what we can to make sure those using your personal information comply with your request for erasure.

Please note that we can't delete your information where:

- we're required to have it by law;
- it is used for freedom of expression;
- it is used for public health purposes;
- it is for, scientific or historical research, or statistical purposes where it would make information unusable;
- it is necessary for legal claims.

You can ask to limit what we use your personal data for

You have the right to ask us to restrict what we use your personal information for where:

- you have identified inaccurate information, and have told us of it;
- where we have no legal reason to use that information but you want us to restrict what we use it for rather than erase the information altogether.

When information is restricted it can't be used other than to securely store the data and with your consent to handle legal claims and protect others, or where it's for important public interests of the UK.

Where restriction of use has been granted, we'll inform you before we carry on using your personal information.

Where possible we'll seek to comply with your request, but we may need to hold or use information because we are required to by law.

You can ask to have your information moved to another provider (data portability)

You have the right to ask for your personal information to be given back to you or another service provider of your choice in a commonly used format. This is called data portability.

However, this only applies if we're using your personal information with consent (not if we're required to by law) and if decisions were made by a computer and not a human being.

It's likely that data portability won't apply to any of the services you receive from the School.

You can ask to have any computer made decisions explained to you, and details of how we may have 'risk profiled' you.

You have the right to question decisions made about you by a computer, unless it's required for any contract you have entered into, required by law, or you've consented to it.

You also have the right to object if you are being 'profiled'. Profiling is where decisions are made about you based on certain things in your personal information, e.g. your health conditions.

If and when WCBC uses your personal information to profile you, in order to deliver the most appropriate service to you, you will be informed.

If you have concerns regarding automated decision making, or profiling, please contact the School Data Protection lead who'll be able to advise you about how we are using your information.

How do we protect your information?

We'll do what we can to make sure we hold records about you (on paper and electronically) in a secure way, and we'll only make them available to those who have a right to see them. Examples of our security include:

- Encryption: meaning that information is hidden so that it cannot be read without special knowledge (such as a password). This is done with a secret code or what's called a 'cypher'. The hidden information is said to then be 'encrypted'.
- Pseudonymisation: meaning that we'll use a different name so we can hide parts of your personal information from view. This means that someone outside of the Council could work on your information for us without ever knowing it was yours.
- Controlling access to systems and networks allows us to stop people who are not allowed to view your personal information from getting access to it.
- Training for our staff allows us to make them aware of how to handle information and how and when to report when something goes wrong.
- Regular testing of our technology and ways of working including keeping up to date on the latest security updates (commonly called patches).

Where in the world is your information?

The majority of personal information is stored on systems in the UK. But there are some occasions where your information may leave the UK either in order to get to another organisation or if it's stored in a system outside of the EU.

We have additional protections on your information if it leaves the UK ranging from secure ways of transferring data to ensuring we have a robust contract in place with that third party.

We'll take all practical steps to make sure your personal information is not sent to a country that is not seen as 'safe' either by the UK or EU Governments.

If we need to send your information to an 'unsafe' location, we'll always seek advice from the Information Commissioner first.

How long do we keep your personal information?

There's often a legal reason for keeping your personal information for a set period of time, we try to include all of these in our retention schedule.

For each service the schedule lists how long your information may be kept for. This ranges from months for some records to decades for more sensitive records.

See the School Records Retention Scheme at this link:

<http://www.internal.wrexham.gov.uk/wordpress/sam/test-schools-intranet/leadership-management/schools-intranet-policies-key-documents/schools-intranet-guidance-material>

Where can I get advice?

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

The School Data Protection Leads: Mr Simon Edwards or Mrs Sarah Hudson, Hafod y Wern C.P. School, Deva Way, Wrexham LL13 9HD

Data Protection Officer

The school have appointed a Data Protection Officer through the Local Authority. The DPO can be contacted on SchoolsDPO@Wrexham.gov.uk.

Information Commissioner's Office

For independent advice about data protection, privacy and data sharing issues, you can contact the Information Commissioner's Office (ICO) at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

Alternatively, visit ico.org.uk (external link) or email casework@ico.org.uk.