

Privacy Notice for Staff

How we use your information 2018/19

Who are we?

Tove Learning Trust is the ‘data controller’. This means we are responsible for how your personal information is processed and for what purposes.

Tove Learning Trust is registered as the Data Controller with the Information Commissioner’s Office (ICO); Registration Number: Z7119841.

What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our staff.

What personal information do we process about staff?

The categories of staff information that we collect, hold and share include:

- personal information such as name, employee or teacher number, national insurance number and bank details
- 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 and special leave information such as number of absences and reasons
- qualifications and, where relevant, subjects taught
- performance information such as appraisal reviews, threshold applications, disciplinary information etc.

For what purposes do we use personal information?

The personal data collected is essential, in order for the school to fulfil their official functions and meet legal requirements.

We collect, use and process staff information on a lawful basis (under the General Data Protection Regulation (GDPR) for the following purposes:

a)	recruit, appoint, employ and retain a suitable workforce	In accordance with the legal basis of Public Task ; necessary to perform tasks that schools are required to perform as part of their statutory function and in terms of any special category data, with Article 9 of the GDPR.
b)	ensure that we can act in an emergency	
c)	enable individuals to be paid and receive other staff benefits	
e)	to ensure the safeguarding of students	In accordance with the legal basis of Vital interest ; to keep children safe
f)	meet the statutory obligations placed upon us	In accordance with the legal basis of Legal Obligation; data collected for DfE census information. (see Department for Education in the section – Who we share our data with).

Collecting staff information

Whilst the majority of staff information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you at the point of collection, whether you are required to provide certain staff information to us or if you have a choice in this and what we will use this information for.

Who might we share your information with?

We do not share information about our staff unless the law and our policies allow us to do so. We specifically do not pass on your details to third parties for marketing purposes.

We routinely share staff information with:

- our local authority and the Department for Education (DfE) via secure data collection returns
- future employers where you have provided them with our contact details to provide an employers reference
- third party software applications necessary to the running of the school i.e. cashless catering software, employee portal, pension providers, HMRC etc.

A full list of the third parties we connect with, what we share and how they use the information is attached as Appendix 1 to this notice.

What do we do with your information?

All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected the Academy Trust monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

How long do we keep your information for?

In retaining personal information, the Academy Trust complies with the Retention Schedules provided by the Information Record Management Society or by the statutory body which overrides this guidance. For more information regarding our data retention schedule and how we keep your data safe please refer to our website.

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

What are your rights with respect of your personal information?

Under data protection law, staff members have the right to request access to information about them that we hold. To make a request for your personal information contact the School Data Protection Officer at Warwickshire Legal Services via email at schooldpo@warwickshire.gov.uk or alternatively;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

****Please ensure you specify which school your request relates to.**

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, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

If you have any queries about this Privacy notice, please contact GDPR@sponne.org.uk

Review

The content of this Privacy Notice will be reviewed annually or where substantial change is required due to a change in the law. The first review is scheduled for May 2019.

Information sharing with third parties

Department for Education

We are required to share information about our staff with the Department for Education (DfE) either directly or via our local authority for the purpose of data collection, under:

- section 537A of the Education Act 1996
- the Education Act 1996 s29(3)
- the Education (School Performance Information)(England) Regulations 2007
- the School Workforce Census: a statutory census that takes place annually during the autumn, spring, and summer terms.

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.

All other third party contacts

The link to the Privacy Notices of these third parties details how they use the data they collect. They will also have an agreement with the school that they will comply with the GDPR regulations when using the data of our staff.

Who	What	Why	Privacy Notice Link
Biostore Ltd	Name, staff ID number, Dietary requirements & allergies, Biometric data from thumbprint	Admin of the Cashless Catering System	https://biostore.co.uk/site-use/gdpr-compliance/
Go 4 Schools	Name, Contacts, Timetable, Demographic information	Provide functionality of Go 4 Schools online Management Information System	http://www.go4schools.com/PrivacyPolicy.aspx
SIMS	Student Data, Contacts, Timetable, Session Attendance, Lesson Attendance, Achievements, Behaviour, Assessment, Student Data (data collection), Contacts (data collection) Reports	Provide functionality of SIMS Management Information System	https://www.capita-sims.co.uk/privacy-notice
Tucasi	Name, bank account,	Provision of online payments	https://www.scopay.com/TucasiPrivacyPolicyGDPR.pdf
EPM	Staff data, bank details, qualifications and contractual information	Provision of contractual information and processing payroll	https://www.epm.co.uk/cookie-and-privacypolicy/
LGSS	Support staff contact information,	Pension provision	http://pensions.northamptonshire.gov.uk/governance/information-governance/

	employment information salary information		
TPS	Teaching staff contact information, employment information	Pension provision	https://www.teacherspensions.co.uk/public/privacy.aspx
HMRC	Staff contact information and salary information	Taxation purposes	https://www.gov.uk/government/publications/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/
Heales Medical	Staff contact information, place of work, job title	Occupational health provider, pre-employment medical questionnaire	http://www.heales.com/docs/hmexout3/Consent%20to%20Transfer.pdf
Lloyds Bank	Name and Bank details	To make BACs payments to staff	https://www.lloydsbank.com/privacy.asp
Computer voucher services	Staff contact details	To produce childcare vouchers	http://www.computersharevoucherservices.com/help/pages/privacy-policies.aspx
Cycle to work scheme	Staff contact details	Administration of cycle to work scheme	https://www.c2w-support.co.uk/privacy_policy.html
Atlantic Data	Names and previous surnames DOB address history and NI number	To perform DBS checks on behalf of Sponne/EPM	http://atlanticdata.co.uk/files/privacy_and_security_policy.pfd