

Workforce Privacy Notice

Author:	Jennifer Surujpaul & Katie Findlater
Applicable to:	Staff, Students and Parents
Effective date:	January 2023
Date of next review:	January 2024

How we use Employee Data	1
The categories of school workforce information that we collect, hold, and share	1
Personal Data:	2
Sensitive Personal Data:	2
CCTV Images	2
Why we collect and use this information	2
We use school workforce data to:	2
The lawful basis on which we collect and use this information	2
Collecting School Workforce Information	3
Storing School Workforce Information	3
System Used for Processing School Workforce Data	3
Information Sharing	3
Why we share Staff information	3
Data Collection Requirements	4
Requesting access to your personal data	4
You also have the right to:	4
Contact	5
Data Protection Officer	5
Human Resources	5

How we use Employee Data

The BRIT School is committed to protecting your privacy and being transparent about what we do with it. We are committed to using your personal information in accordance with all applicable laws concerning the protection of personal information. We will not do anything with your information you wouldn't reasonably expect or that is required of us by law. We will use the information that we collect about you in accordance with the UK General Data Protection Regulation (UK GDPR).

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relates to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

The BRIT School is the data controller for all employee data collected and handled.

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

Personal Data:

Personal information: name, DfE number (teachers), address, telephone number(s), email address, bank details, qualifications, contractual information, salary information and national insurance number.

Pre-employment Information: Interview notes, test results, references.

Sensitive Personal Data:

Characteristics: ethnicity, nationality, date of birth.

Medical Information: Fit for role, sickness absence log, details of long-term illnesses requiring reasonable adjustments.

Disability: assessment, reasonable adjustment provision, meeting notes.

Staff Conduct Information: disciplinary/grievance/capability paperwork to date.

Child Protection Information: DBS record, reports, investigations, and outcomes of any child protection concerns

Data is collected from the employee when applying to, following role offers and starting work with The BRIT School.

CCTV Images

The BRIT School uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to provide a safe and secure environment for pupils, staff, and visitors, and to prevent the loss or damage to school property.

Please refer to our CCTV Policy for further information. This can be found at www.brit.croydon.sch.uk/policies

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 development of recruitment and retention policies ***
- Enable individuals to be paid
- Comply with Safer Recruitment requirements
- Comply with the law regarding data sharing

The lawful basis on which we collect and use this information

All personal and sensitive data held by The BRIT School will be processed fairly, lawfully and in a transparent manner. We will only use the data for the purposes specified above, and for explicit and legitimate purposes.

The BRIT School will collect and hold personal and sensitive personal data for the following lawful basis:

- 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 controller.
- Processing is necessary for reasons of substantial public interest, on the basis of 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;
- Work force census****

- Working time regulations 1998
- Tax & National Insurance
- Minimum Wage Act 1998
- Statutory sick pay
- HSE

Collecting School Workforce Information

Whilst the majority of School Workforce information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the UK General Data Protection Regulation, 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 School Workforce Information

We hold school workforce data in secure digital and physical storage. We will retain records up to 6 months for applicants and 6 years for employees. For an exhaustive list of retention periods, please refer to The BRIT School Data Retention Schedule, which can be found on our website: www.brit.croydon.sch.uk/policies ***

System Used for Processing School Workforce Data

	PERSONAL DATA	SENSITIVE DATA
ISAMs (school management information system (MIS) Spreadsheet	✓	✓
CIPHR (school HR system)	✓	✓

Information Sharing

We routinely share pupil information with the following:

- Schools/organisations that the employees attend after leaving us;
- Our local authority;
- The Department for Education (DfE).
- Pension Schemes
- Payroll provider
- HR MIS system
- Disclosure Services
- Solicitors
- Maitland Medical

Why we share Staff 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 share school workforce 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 of educational attainment.

We are required to share information about our workforce members with our local authority (LA) under section 5 of The Education (supply information about School Workforce) (England) Regulations 2007 and amendments. We are required to share personal details of school workforce with our payroll provider in order to ensure our workforce is paid correctly.

School workforce members are required to supply personal details to our DBS agency and Occupational Health provider for the purpose of safer recruitment and health and safety provisions.

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 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-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 by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases 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 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/dataprotection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website: <https://www.gov.uk/government/publications/national-pupildatabase-requests-received>

To contact the Department for Education: <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 Human Resources (personnel@brit.croydon.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

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance, by contacting the Data Protection Coordinator (dpo-brit@brit.croydon.sch.uk).

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

Contact

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

Data Protection Officer

Judicium Consulting Limited 72 Cannon Street
London EC4N 6AE

Tel: 020 326 9174

Email: dataservices@judicium.com

Human Resources

Head of People and Place
The BRIT School
60 The Crescent
Croydon

CR0 2HN Tel: 020 8665 8600

Email: people@brit.croydon.sch.uk