

## Bromley Hills Primary School

### Privacy Notice (How we use school workforce information)

Bromley Hills Primary School collects and processes personal data relating to its employees to manage the employment relationship. Bromley Hills Primary School is committed to being transparent about how it collects and uses the data and to meeting its data protection obligations. This privacy notice will inform you about why Bromley Hills Primary School collects and processes a range of information about you.

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

- personal information (such as name, address and contact details, employee and teacher number, details of your bank, national insurance number, information about your marital status, next of kin, dependants and emergency contacts)
- special categories of data including characteristics information (such as gender, age, ethnic group)
- contract information (such as start dates, terms and conditions of your employment, hours worked, post, roles and salary information, information about entitlement to benefits such as pensions, information about your nationality and the entitlement to work in the UK)
- work absence information (such as number of absences and reasons, maternity/paternity/adoption leave details)
- qualifications (such as skills, experience and employment history, where relevant, subjects taught)
- Information about your criminal record.
- details of any disciplinary or grievance procedures in which you have been involved and their outcomes (such as any warnings issued to you and related correspondence)
- assessments of your performance (such as appraisals, performance reviews and ratings, performance improvement plans and related correspondence)
- information about medical or health conditions (such as whether or not you have a disability for which the organisation needs to make reasonable adjustments)
- recruitment information, including copies of right to work and proof of address documentation, references and other information included in an application form or cover letter or supplied as part of the application process
- photographs

#### **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
- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights.
- operate and keep a record of disciplinary and grievance processes, to ensure

acceptable conduct within the workplace.

- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes.
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled.
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the school complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled
- ensure effective general HR and business administration
- provide references on request for current or former employees
- respond to and defend against legal claims
- maintain and promote equality in the workplace
- facilitate safe recruitment and maintain the Single Central Record, as part of our safeguarding obligations towards pupils.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities).

## **The lawful basis on which we process this information**

We process this information under the following UK General Data Protection Articles:

6.1(b) Processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

6.1(c) Processing is necessary for compliance with a legal obligation to which the controller is subject

For example: The Health and Safety at Work Act, Equality Act 2010, The Disability Discrimination Act.

6.1(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 controller.

For example: The Education Act requires the collection of workforce data for the purpose of Departmental Census. Working together to Safeguard Children Guidelines (DfE).

9.2(b) Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by domestic law or a collective agreement pursuant to domestic law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.

## Collecting workforce information

Bromley Hills Primary School collects personal information in a variety of ways. For example, data might be collected through application forms, CVs or resumes; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment; from correspondence with you; or through interviews, meetings or other assessment.

In some cases, Bromley Hills Primary School may collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law.

Workforce data is essential for the school's/local authority's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with data protection legislation, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this and we will tell you what you need to do if you do not want to share this information with us.

## Storing this information

We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please visit <https://bromleyhills.sch.life/page/detail/school-policies> to view our retention policy. We also use the IRMS Toolkit for Schools as a reference, <https://irms.org.uk/page/SchoolsToolkit>

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our record retention schedule.

Details of where we store data can be found on our Information Asset Register.

## Who we share this information with

Your information may be shared internally, including with those people responsible for HR and recruitment (including payroll), senior staff who you report to or who have supervisory/management responsibilities for you and business support and IT staff if access to the data is necessary for performance of their roles.

Bromley Hills Primary School routinely shares this information with:

- our local authority
- the Department for Education (DfE)
- Our regulator – Ofsted
- Trade unions and associations
- Police forces, courts, tribunals

## 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.

**PIMS** comprises of two interfaces: (1) MyHR – which provides access via a dedicated login for all employees to a personal dashboard interface; (2) PIMS – which provides access to managers via a dedicated login for managers to manage their employees. PIMS also assists with the management of payroll, pensions and other back end issues. PIMS provides accessibility and ensures information security when working within the school and remotely. For further information, please refer to the school's data protection impact assessment for PIMS.

**Talent Link** is an applicant tracking system used by schools to support their end to end recruitment process needs. These include CRM, job approvals, job posting, social media integration, career site development, applying online, selection process management including shortlisting, assessment integration, interview scheduling, offers and contract generation and onboarding. For further information please refer to the school's data protection impact assessment for Talent Link.

**RM Integris** is the School's Management Information System. The MIS allows the school to record staff personal information, home address and contact information, details of emergency contacts, medical information, teacher number, details of qualifications and training.

<https://www.rmplc.com/gdpr/rm-education/rm-integris>

## Department for Education (DfE)

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:

We are required to share information about our school employees with the Department for Education (DfE) 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.

For privacy information on the data the Department for Education (DfE) collects and uses, please see: <https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers>

## 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

YourIG Data Protection Officer Service  
Dudley MBC, 3-5 St James's Road, Dudley, DY1 1HZ  
Email: [YourIGDPOService@dudley.gov.uk](mailto:YourIGDPOService@dudley.gov.uk) Tel: 01384 815607

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 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/>

## 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 on 20<sup>th</sup> September 2024.

## Contact

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

YourIG Data Protection Officer Service  
Dudley MBC, 3-5 St James's Road, Dudley, DY1 1HZ  
Email: [YourIGDPOService@dudley.gov.uk](mailto:YourIGDPOService@dudley.gov.uk) Tel: 01384 815607

## 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.

For more information about the Department for Education's (DfE) data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the Department for Education (DfE) has provided information, (and for which project) please visit the following website: <https://www.gov.uk/government/publications/dfes-external-data-shares>

## 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>