

Greig City Academy: Privacy Notice

How we use staff information

1. Introduction

Under the UK General Data Protection Regulation (UK GDPR) we are obliged to inform you of the information we hold on yourself, what we use it for, with whom we share it, and for how long we keep it. This privacy notice aims to provide you with this information.

We, Greig City Academy at High Street, Hornsey, N8 7NU, are the Data Controller for the purposes of data protection law.

As a public body we have appointed a Data Protection Officer (DPO):

Paul Letford, Assistant Vice Principal

T: 020 8609 0148 E: pletford@greigcityacademy.co.uk

2. The categories of employee information that we collect, hold and share include (but are not limited to):

- Personal information (such as name, address)
- Contact details and preferences (contact telephone numbers, email addresses)
- Characteristics (such as ethnicity, religion, language, nationality, country of birth)
- The terms and conditions of your employment
- Details of your qualifications, skills, experiences and employment history, including start and end dates, with previous employers and with the Academy
- Information about your remuneration, including entitlement to benefits such as pensions and insurance cover
- Details of your bank account and National Insurance number
- Information about your marital status, next-of-kin, dependants and emergency contacts
- Information about your entitlement to work in the UK
- Information about your criminal record
- Details of your schedule (days of work and working hours) and attendance at work
- Details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave
- Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence
- Assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence
- Information about medical and health conditions, including whether or not you have a disability for which the Academy needs to make reasonable adjustments and fulfil its duty of care (including the use of Occupational Health Services)

- Details of trade union membership, where provided by yourself or your trade union
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief – where this has been provided
- Photographs (for internal safeguarding and security purposes, school newsletters, media and promotional purposes)
- CCTV images

We may also hold personal data about you from third parties, such as references supplied by former employers, information provided during the completion of our pre-employment checks, and from the Disclosure and Barring Service (DBS), in order to comply with our legal obligations and statutory guidance.

3. Why we collect and use this information

The purpose of collecting and processing this data is to help us recruit staff and run the school efficiently, including to:

- enable you to be paid and other benefits be provided
- facilitate our safer recruitment of staff as part of our safeguarding obligations towards students
- fulfil our legal obligations in recruiting staff
- support effective performance management and appraisal
- support effective management of the school workforce, along with the implementation of its policies and procedures
- inform our recruitment and retention policies
- allow better financial modelling administration and planning
- provide references where requested
- monitor and report on equalities issues
- respond to any staffing issues
- improve the management of workforce data across the Academy
- support the work of the School Teachers' Review Body
- assess the quality of our services
- comply with the law regarding data sharing

4. The lawful basis on which we use this information

The lawful basis for our collection and processing of your information is defined under Article 6 (UK GDPR). The following sub-paragraphs in the UK GDPR apply:

- Data subject gives consent for one or more specific purposes.
- Processing is necessary to comply with the legal obligations of the controller.
- Processing is necessary to protect the vital interests of the data subject.
- Processing is necessary for tasks in the public interest or exercise of authority vested in the controller (the provision of education).

Our lawful basis for collecting and processing your information is also further defined under Article 9 (UK GDPR), in that some of the information we process is deemed to be sensitive, or special. The following sub-paragraphs in the UK GDPR apply:

- The data subject has given explicit consent.
- It is necessary to fulfil the obligations of the controller or of the data subject.
- It is necessary to protect the vital interests of the data subject.
- Processing is carried out by a foundation or not-for-profit organisation (includes religious, political or philosophical organisations and trade unions)
- Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment.
- It is in the public interest.

Some of the reasons listed above for collecting and using staff members' personal data overlap, and there may be several grounds which justify our use of this data.

5. Collecting staff 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 the GDPR, we will inform you whether you are required to provide certain information to us or if you have a choice in this. Where we have obtained consent to use your personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

6. Storing staff data

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is used only 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 retention policy.

We have data protection policies and procedures in place, including strong organisational and technical measures, which are regularly reviewed.

7. Those with whom we share staff information

We routinely share staff information with appropriate third parties, including:

- The Department for Education – to meet our legal obligations to share certain information with it
- Haringey local authority – to meet our legal obligations relating to certain staffing matters

- Your family and representatives – such as in the event of an emergency
- Educators and examining bodies – when ensuring we adhere to examining regulations to guarantee the validity of examinations
- Ofsted – during the course of the school inspection
- Suppliers and service providers – to enable them to provide the service we have contracted them for e.g., HR, payroll, employee benefit schemes
- Financial organisations e.g. Pension Scheme
- Our auditors – to ensure compliance with our legal obligations
- Health authorities and Occupational Health and employee support schemes – to ensure the well-being of our staff in accordance with our responsibilities as employer
- Professional advisers and consultants – for us to develop our provision to best provide our public service
- The Academy’s Governing Body
- Police forces, courts, tribunals
- Future employers
- CPD providers
- Our IT service provider and cloud storage provider

Where our suppliers or contractors need data to enable us to provide services to our employees we will:

- only appoint suppliers or contractors which can provide sufficient guarantees that they comply with data protection law and have satisfactory security measures in place.
- establish a data sharing agreement with the supplier or contractor, either in the contract or as a standalone agreement, to ensure the fair and lawful processing of any personal data we share.

We may send your personal data to other countries where:

- We, or a company we work with, store information on computer servers based overseas; or we communicate with you when you are overseas.
- We conduct due diligence on the companies we share data with and note whether they process data in the UK, EEA (which means the European Union, Liechtenstein, Norway and Iceland) or outside of the EEA.
- The UK and countries in the EEA are obliged to adhere to the requirements of the GDPR and have equivalent legislation which confer the same level of protection to your personal data.
- For organisations who process data outside the UK and EEA we will assess the circumstances of how this occurs and ensure there is no undue risk.
- Additionally, we will assess if there are adequate legal provisions in place to transfer data outside of the UK.

8. Why we share your information

We do not share information about our staff 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 of educational attainment. 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 the DfE under a combination of software and hardware controls which meet the current [government security policy framework](#).

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>

9. Requesting access to your personal data and your Data Protection Rights

Under data protection law, staff members have the right to request access to information about them that we hold, through a Subject Access Request.

If you make a subject access request, and if we do hold information about you, we will:

- give you a description of it.
- tell you why we are holding and processing it, and for how long we will keep it.
- explain where we got it from, if not from you.
- tell you who it has been, or will be, shared with.
- let you know whether any automated decision-making is being applied to the data, and any consequences of this.
- give you a copy of the information in an intelligible form.

You have the right to:

- object to the processing of personal data that is likely to cause, or is causing, damage or distress
- withdraw your consent to processing at any time, this only relates to tasks which the school relies on consent to process the data.
- ask us to rectify, erase or restrict processing of your personal data, or object to the processing of it in certain circumstances and where sufficient supporting evidence is supplied
- prevent the use of your personal data for direct marketing
- challenge processing which has been justified on the basis of public interest, official authority or legitimate interests.
- request a copy of agreements under which your personal data is transferred outside of the United Kingdom.
- object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, which might negatively affect them)
- be notified of a data breach in certain circumstances
- claim compensation for damages caused by a breach of the Data Protection regulations
- refer a complaint to the Information Commissioner's Office (ICO)
- ask for your personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances)

If you would like to make a subject access request or exercise any of the rights listed above, please contact our **Data Protection Officer (DPO)**:

Paul Letford, Assistant Vice Principal

T: 020 8609 0148 E: pletford@greigcityacademy.co.uk

The School will comply with the Data Protection legislation in regard to dealing with all data requests submitted in any format, individuals are asked to preferably submit their request in written format to assist with comprehension.

Requests should include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the request

If any member of staff, governor or volunteer receives a request, they must immediately refer it to the DPO.

10. Responding to subject access requests or queries as to your rights

In most cases, we will respond to requests within one month, as required under data protection legislation. However, we are able to extend this period by up to two months for complex requests or exceptional circumstances.

A request will be deemed to be manifestly unfounded or excessive if it is repetitive or asks for further copies of the same information.

In the event we refuse a request, we will tell the individual why, and tell them they have the right to refer a complaint to the ICO.

11. Complaints

We take any complaints about our collection and use of personal information seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our Data Protection Officer

Paul Letford, Assistant Vice Principal

T: 020 8609 0148 E: pletford@greigcityacademy.co.uk

Alternatively, you can:

- make a complaint to the Information Commissioner's Office (ICO):
- report a concern online at <https://ico.org.uk/concerns/>
- call the ICO on 0303 123 1113

12. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact the Data Protection Officer – details as above.

13. 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 July 2, 2024.

Appendix One: How Government uses your data

The workforce data that we lawfully share with the Department for Education (DfE) through data collections:

- informs the DfE 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 DfE, including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Sharing by the DfE

The DfE 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 DfE 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 the Department for Education (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.

How to find out what personal information the DfE holds about you

Under the terms of the Data Protection Act 2018, you're entitled to ask the DfE:

- 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 DfE, you should make a 'subject access request'. Further information on how to do this can be found within the DfE's personal information charter that is published at this address:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>