

# Inspire - Enable - Achieve



## The Vale Federation Privacy Notice - Workforce

Date policy last reviewed: September 2024  
Date policy to be reviewed: September 2025

Signed:

 Principal

Date 12th November 2024

David J Pearce Chair of Governors Date 12th November 2024

# **The Vale Federation**

## **Data Privacy Notice**

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

**Data Protection Officer: Data Protection Education**

**Deputy DPO: Business Director & Finance & IT  
Manager**

**Telephone: 0800 086 2018**

**Email: [dpo@dataprotection.education](mailto:dpo@dataprotection.education)**

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## Privacy Notice – School Workforce – Purpose of this Policy

The Vale Federation (includes Booker Park School and Stocklake Park School) is a data controller, and this document describes the workforce data that is collected and how it is processed. As a controller, we are responsible for deciding what data is collected and how it is processed.

Under the Data Protection Act 2018 and the UK GDPR, we must abide by the principle of transparency and the right of data subjects to be informed about how their data is processed.

Workforce includes employed staff, governors and volunteers directly engaged with the school/federation in a specified activity.

This document provides such information. It will be updated occasionally, and updates will be communicated accordingly.

It is your duty to inform us of changes about you and your data.

## Privacy Notice – School Workforce (How we use workforce information)

### The categories of school information that we process

These include:

- personal information (such as name, employee or teacher number, national insurance number)
- characteristics information (such as, sex, age, ethnic group)
- contract information (such as start date, hours worked, post, roles and salary information)
- work absence information (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught)
- medical information (such as additional supportive measures)
- payroll information (tax code, union subscriptions, pension contributions, attachment of earning payments)
- next of kin information (name, address, telephone and email address)

This list is not exhaustive, to access the current list of categories of information we process please see request a link to our Data Asset Register from [dpo@thevalefederation.com](mailto:dpo@thevalefederation.com)

### Why we collect and use workforce information

We use workforce data to:

- a) enable the development of a comprehensive picture of the workforce and how it is deployed
- b) inform the development of recruitment and retention policies
- c) enable individuals to be paid
- d) to support members of the workforce

Under the [UK General Data Protection Regulation \(UK GDPR\)](#), the legal basis / bases we rely on for processing personal information for general purposes are:

- a) Consent: the individual has given valid consent for you to process their personal data for a specific purpose.
  - b) Contract: the processing is necessary to perform a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
  - c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).
  - d) Vital interests: the processing is necessary to protect someone's life.
  - e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- for the purposes of employment, payroll, retention and supportive measures in accordance with the legal basis of a, b, c and d above
  - for the purposes of employment contracts and regulations in accordance with the legal basis of b above
  - for the purposes of employment workforce data in a professional capacity in accordance with the legal basis of e above
  - for the purposes of employment pay in accordance with the legal basis of b above

In addition, concerning any special category data ([UK GDPR - Article 9](#)):

- DPIA (Data Protection Impact Assessment) are completed for all special category data held
- Special Category Data is supplied voluntarily, either via a completed employment application form or by manual entry by the data subject themselves
- Any special data will always meet one of the following criteria:
  - a) Explicit consent
  - b) Employment, social security and social protection (if authorised by law)
  - c) Vital interests
  - d) Health or social care (with a basis in law)

## Collecting workforce information

We collect personal information via:

- Employment paper application form
- Flexible working request paper form
- Security fob request form

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 UK GDPR, 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.

## Storing workforce 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://www.thevalefederation.com/policies-2/gdpr/>.

Further details of our Data Retention Policy can be requested from [dpo@thevalefederation.com](mailto:dpo@thevalefederation.com)

Data is currently held as follows:

Data	Where	Security	DPIA Completed (if applicable)	Retention Period
Personal, characteristics, contract, work absence, qualifications, medical, payroll, special category and next of kin information,	Access Software System	High, Encrypted	YES	Contact dpo@thevalefederation.com
Personal, characteristics, contract, work absence, qualifications, medical, payroll, special category and next of kin information,	Filing cabinets (application form data only)	High, Secure Restricted Access Cabinets	n/a	Contact dpo@thevalefederation.com
Security Access Entry System	Paxton Software System	High, Encrypted	YES	Contact dpo@thevalefederation.com
Accident Reports	Smartlog Software System	High, Encrypted	YES	Contact dpo@thevalefederation.com
Personal, characteristics	Entry Sign Ltd	High, Encrypted	YES	Contact dpo@thevalefederation.com

## Who we share workforce information with

We routinely share this information with:

- The Vale Federation (the organisation and governing board responsible for the school(s))
- Our local authority (where applicable for employment contracts)
- The Department for Education (DfE)
- Access Payroll Services (production and processing of monthly payroll)

- Browne Jacobson LLP (HR Partner)
- Optima Health (Occupational Health support for employees)
- Health & Safety Executive (RIDDOR accident submissions)

## Why we share school workforce information

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

Data Type	Legal Basis for Sharing	Shared With	Method of Transfer
Personal, characteristics, contract, work absence, qualifications, medical, payroll, special category and next of kin information	<p>Contract: the processing is necessary to perform a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.</p> <p>Vital interests: the processing is necessary to protect someone's life.</p>	The Vale Federation	Electronic, Secure Internal Network, Encrypted, Restricted Access
Personal, characteristics, contract, work absence, qualifications, medical, payroll, information	<p>Contract: the processing is necessary to perform a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.</p> <p>Vital interests: the processing is necessary to protect someone's life.</p>	Local Authority	Electronic, Secure Data Transfer, Encrypted
Characteristics, contract, work	Contract: the processing is necessary to	Department for Education	Electronic, Secure Internal Network,

<p>absence, qualifications, payroll,</p>	<p>perform a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.</p> <p>Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.</p>		<p>Encrypted, Restricted Access</p>
<p>Payroll</p>	<p>Contract: the processing is necessary to perform a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.</p> <p>Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).</p>	<p>Access Payroll Services</p>	<p>Electronic, Dedicated Software, Encrypted, Restricted Access</p>
<p>HR Support</p>	<p>Contract: the processing is necessary to perform a contract you have with the individual, or because they have asked you to take specific steps</p>	<p>Browne Jacobson LLP</p>	<p>Electronic, Encrypted, Restricted Access</p>



	<p>before entering into a contract.</p> <p>Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).</p>		
Occupational Health	<p>Contract: the processing is necessary to perform a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.</p> <p>Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).</p>	Optima Health	Electronic, Encrypted, Restricted Access
Accident at Work Reporting/RIDDOR	<p>Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).</p>	HSE (Health & Safety Executive)	Electronic, Encrypted, Restricted Access

## 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)

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 the Department for Education (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

The UK-GDPR gives you certain rights about how your information is collected and used. To make a request for your personal information, contact [dpo@thevalefederation.com](mailto:dpo@thevalefederation.com)

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request, data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to [complain to the Information Commissioner](#) if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent.

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 [raise a concern with ICO](#)

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

## Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting [dpo@thevalefederation.com](mailto:dpo@thevalefederation.com)

## 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 25 September 2024

## Contact

If you would like to discuss anything in this privacy notice, please contact: [dpo@thevalefederation.com](mailto:dpo@thevalefederation.com)

## How Government uses your data

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

- informs the Department for Education (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 Department for Education (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 Department for Education (DfE)

The Department for Education (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 Department for Education (DfE) will only share your personal data where it is lawful, secure and ethical to do so and 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 public benefit, proportionality, legal underpinning and strict information security standards.

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/dfe-external-data-shares>

## **How to find out what personal information the Department for Education (DfE) hold about you**

Under the terms of UK GDPR, you're entitled to ask the Department for Education (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 Department for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:

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

or

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

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

To contact the The Vale Federation about any elements stated within this Privacy Notice – Workforce Policy, please email [dpo@thevalefederation.com](mailto:dpo@thevalefederation.com)

To be reviewed annually or any any changes or updates to the legislation by The Business Director.