Privacy Notice for our Workforce

Our workforce includes our paid staff, volunteers and others, paid or unpaid, involved in the running of our schools. We are required to provide you with details concerning how we use and protect your personal data, as well as your rights in respect of the processing of your personal data.

Who we are	Your school is part of the Learning in Harmony Trust Multi Academy Trust, which will be referred to as 'the Trust' in this document. The Trust is the organisation which is in charge of the safety and security of the personal information that the school holds about you. This means the Academy Trust is called the Data Controller.
Contact details	**Mail:** **Learning in Harmony Trust,** Hartley Primary School Hartley Avenue London E6 1NT The **Data Protection Officer** is responsible for overseeing data protection within the School so if you do have any questions in this regard, please do contact them on the information below: - Data Protection Officer: Bulletproof Cyber Limited Address: Unit H Gateway 1000, Whittle Way, Stevenage, SG1 2FP Email: dposupport@bulletproof.co.uk
Categories of information that we collect, hold and share	**Personal information**: Full name, date of birth, name, address, telephone number, National Insurance number, teacher number, DBS number **Characteristics:** gender, age, nationality, country of birth **Sensitive data:** Ethnicity, medical information, biometric data **Contract information:** such as start date, hours worked, post, roles and salary information, number of absences and reasons **Qualifications** and where relevant, subjects taught·
Sources of personal data	• Application forms • Contracts • HR and Payroll records • Digital images • CCTV
Why and how we use your information	Workforce data is essential for the school'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 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. We use this personal 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 • For security and safety purposes - Images of our workforce will be captured on our CCTV system which monitors public areas

	including the main entrance used by visitors, the pedestrian and vehicle gates, and the entrances to all other School buildings. Trust Schools do not have internal CCTV cameras, with the exception of Sheringham Primary School, Blenheim, John F. Kennedy and Hartley which monitors CCTV in non-class based public internal areas. Please refer to the CCTV Policy for further information on our use of CCTV.
When we give your information to others	We routinely share this information with: ● our local authority (where applicable) ● the Department for Education (DfE) ● Newham Partnership Working (HR and Payroll) We do not share information about our 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. **Department for Education** We are required to share information about our school employees with the (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. We disclose personal data about you to the Disclosure and Barring Service for the purposes of carrying out checks on your suitability for work with children. We disclose details about you including national insurance number and absence information to our payroll provider to enable you to be paid. Our Payroll provider is Newham Partnership Working. We disclose details about you to our HR provider for the purposes of HR management. Our HR provider is Stone King LLP. We share your identity and pay information with HMRC in conjunction with your legal obligation to pay income tax and make national insurance contributions. We share your details with your pension provider in order to make sure that you pay the correct amount and maintain your entitlement to a pension upon your retirement. For teachers the scheme is the TPS, for support staff the scheme is LGPS.

	Where you have decided to become part of a salary sacrifice or staff rewards scheme such as that for child care vouchers, we share your details with the provider to the extent necessary for them to provide the vouchers to you and this is done with your consent, you may withdraw your consent and opt out of these schemes.
Legal basis for using your personal data	The legal basis for the processing of your information are: ● for the purposes of running a multi academy trust providing education to pupils in accordance with the legal basis of public interest ● for the purposes of employing and paying staff in accordance with the legal basis of the performance of a contract and in compliance with a legal obligation ● The disclosure is necessary for the performance of your employment contract ● The disclosure is necessary for the performance of a legal obligation to which the Academy Trust is subject, for example our legal duty to safeguard pupils ● Or, where we have you consent to do so. The legal basis for processing special category sensitive information is to comply with the Public Sector Equality Duty and the requirements of Schedule 1 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments and other Employment and Education Laws.
Your right to withdraw consent	Where you have provided consent for the processing of your information you have the right to withdraw that consent at any time. If you do, it will not affect the lawfulness of any processing for which we had consent prior to your withdrawing it.
Location of your personal data	We store information in your HR file and centrally in a main pupil database system. Paper HR files are stored securely in locked file cabinets and are accessible to authorised users on a case by case basis. The main pupil data base s is a secure system which is encrypted and password protected and access to the information is limited to those that need it on a case by case basis. CCTV images do not leave School premises and are never shared with any third party, with the potential exception of law enforcement agencies in the event of a security breach. Images are kept for no longer than 30 days in line with our CCTV Policy. We do not normally transfer your information to a different country which is outside the European Economic Area. We ensure that all servers and cloud based servers are located within the European Economic Area.
How long we will keep your personal data for	We only keep your information for as long as we need to or for as long as the law requires us to. We have a policy which explains how long we keep

	information. It is called a Records Retention Policy and you can find it on our website.
Your rights in respect of your personal data	You have these rights under the law relating to data protection: ● You can ask us for a copy of the information we have about you (Subject Access Request) ● You can ask us to correct any information we have about you if you think it is wrong ● You can ask us to erase information about you (although we may have good reasons why we cannot do this) ● You can ask us to limit what we are doing with your information ● You can object to what we are doing with your information ● You can ask us to transfer your information to another organisation in a format that makes it easy for them to use.
Complaints	If you have any concerns or complaints about how we are handling your data please do not hesitate to contact our Data Protection Officer at the address given above. If you are unhappy with how we have handled you compliant you can also contact the Information Commissioner's Office: Information Commissioner's Office 4th Floor, No.3 Circle Square 5 Hawkshaw Street Manchester M1 7BL Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.
Further information	There is more information in our Data Protection and Breach Management Policy, Retention Policy and our Use of Images Policy which can be found on our website.