

# 3. Reviewing and Updating your Privacy Notice

May 2018

<b>Control Sheet: GDPR Introductory Note</b>			
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<b>Valid until:</b>	Revisions to current GDPR guidance; Annual Review from 1 March 2019		
<b>Short description/ notes:</b>	With implementation of GDPR from May 2018, HLT has developed a framework of <b>8 Key Tasks</b> for schools to complete to ensure your compliance. This briefing note introduces the third key task of reviewing and updating Privacy Notices in schools.		
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<b>Updates in this briefing are included for the following areas of the data matrix:</b>			
N/a at this point			

## 1. What is a privacy notice?

- 1.2. Informing people about how their personal data is used is a key element of the GDPR. Schools as data controllers in their own right have a duty to inform pupils, staff and parents how they process the personal data they collect and hold about them.
- 1.3. The term 'privacy notice' relates to the notice or statement that you make available to people regarding how you are going to use the personal data you collect about them. It can take the form of one detailed document or several notifications in a more layered approach depending on how and when you collect people's personal data.
- 1.4. Schools should make the privacy notice available on the school website and must provide a copy to an individual prior to personal data being collected unless the individual already has the information contained in the notice. In practice, existing staff will also need to be provided with a copy of the privacy notice as they are unlikely to have all of the information in the notice.
- 1.5. Template privacy notices for pupils / parents at primary schools (including children's centres) and secondary schools and special schools are attached as **Appendices A and B** respectively, a template privacy notice for staff (across all schools) is attached as **Appendix C**. Schools must review the template to ensure it is an accurate reflection of your school's data processing activities.

## 2. Privacy Notices in the new world of GDPR

- 2.1. The GDPR builds on the expectations around privacy notices specified in the Data Protection Act 1998 by widening the first data protection principle to highlight additional information to individuals. While there has always been an obligation on data controllers to identify who will be processing the personal data and for what purpose, data controllers must now be more specific about what they are doing with personal data, an individual's rights in respect of such data, who it is being shared with, etc.

## 3. What you need to tell people

- 3.1. Article 13 of GDPR specifies what information you must provide to the people whose personal data you collect. The full text of Article 13 can be found on page 40 of the GDPR by clicking on the hyperlink: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN>.
- 3.2. The ICO has issued a checklist setting out what different types of information data controllers need to tell people in their privacy notices - <https://ico.org.uk/for-organisations/guide-to-data-protection/privacy-notices-transparency-and-control/your-privacy-notice-checklist/>.
- 3.3. We have developed the Department for Education (DfE) templates and populated them with information that it is believed is relevant to Hackney schools. However, you must **review the template to ensure it is an accurate reflection of your school's data processing activities**. As a data controller, are you certain your privacy notice covers all the data processing your school is involved in and can you confirm all statements regarding data processing are true? Does your school collect and process personal data for any reasons not listed in the DfE templates or in Appendix A, B or C? In particular;
- 3.4. Do you process personal data in pursuit of any 'legitimate interests', e.g. direct marketing for commercial purposes using email addresses? Further guidance on data processing for legitimate interests can be found at - <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/>.

- 3.5. Do you undertake any automated decision making processes using personal data, e.g. using software algorithms to check eligibility for pupil benefits or assess admissions applications if you are an admissions authority?
- 3.6. Do you transfer any data outside of the European Economic Area (EEA)? This relates to any data processors your school works with. Providers of schools information management systems (SIMS) will be able to confirm whether or not they have access to school data and if they transfer any data abroad. For example, Capita do not have access to pupil level SIMS data which is hosted on each school's local servers. However, additional Capita applications (e.g. Agora) may host school data in the cloud. If your school uses Capita SIMS but no other additional Capita services you can state that your school does not transfer data abroad. If your school uses multiple applications from Capita or other SIMS providers you should check those provider's privacy notices to see if they transfer data abroad.

#### 4. Level of detail required

- 4.1. A good privacy notice will be written in clear language so that all individuals will understand it. This will also reduce the risk of people misunderstanding and feeling misled with regards what their personal data will be used for.
- 4.2. The Department for Education has provided a series of privacy notice model documents (<https://www.gov.uk/government/publications/data-protection-and-privacy-privacy-notices>) which gives an indication of what they expect schools to tell people and the level of detail required.
- 4.3. Further guidance about the information individuals should be given about the collection and use of their personal data, which is a key transparency requirement under the GDPR, can be found in the ICO guidance (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-be-informed/>).
- 4.4. You should explain how you collect information regarding your pupils / staff. Personal data regarding pupils will usually be collected in registration forms or received in Common Transfer Files from previous schools.
- 4.5. The GDPR has raised the requirement to be transparent about how and why organisations process personal data. GDPR requires privacy notices to state the purpose for data processing and also the lawful basis for it.
- 4.6. A school may process personal data for following purposes:
  - Provide pupils with an education
  - Allocate the correct teaching resources
  - Assess the quality of teaching in the school
  - Provide any additional support to its pupils
  - To ensure the safety of pupils whilst in your care
  - Protecting children from harm outside school
  - To comply with legal obligations regarding data sharing (e.g. schools census)
- 4.7. The GDPR also states that you must identify and include the lawful basis for collecting and using personal data for the above stated purposes. This must include a basis from Article 6 of the GDPR, and, where the data is special category data (such as ethnicity) a basis from Article 9.
- 4.8. Any data that is shared with the DfE is required under legislation and so falls within the lawful basis described in Article 6(c) (legal obligation) of the GDPR.
- 4.9. Further details about establishing a lawful basis can be found in the Guidance Note relating to the Information Asset Register at section 3.9. and on the ICO website at

- <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/>.

## 5. Do you need consent for collecting and processing personal information?

- 5.1. If you can establish a clear alternative lawful basis for collecting personal data (for example a legal obligation or performance of a public task) then this should be relied on as consent can be withdrawn at any time meaning that your school can no longer process the data.
- 5.2. Consent is only one of the lawful bases for processing and is not inherently better or more important than the other bases. Detailed guidance on when seeking consent is appropriate and what constitutes valid consent under the GDPR can be found in the ICO Consent Guidance (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/consent/>).
- 5.3. Most of the personal data that schools collect is required for the purposes of performing a public task or to meet legal obligations (e.g. to submit data for the schools census) and so these will be the lawful basis for processing in the majority of cases.
- 5.4. Review - Information about the different lawful bases for processing can be found on the ICO website at - <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/>.

Appendix A (for primary schools and associated children's centres):

[Suggested wording to give to pupils and parents at primary schools and early years providers. Please note, as a data controller **you must review and amend to reflect local needs and circumstances**. You may process data in ways that are not described by this template - please see points 3.3 to 3.6 above]

## Privacy Notice (How we use pupil data)

We **[insert name and contact details of school]** are a Data Controller for the purposes of the General Data Protection Regulation. We collect information from you and may receive information about you from your previous school. If you have any queries about this Privacy Notice please contact our Data Protection Officer **[insert full contact details of the Data Protection Officer]**.

**The categories of pupil data that we collect, hold and share include:**

- Personal information (such as name, unique pupil number and address)
- Parental contacts (name, contact details, relationship and priority in an emergency)
- Safeguarding information (such as court orders, professional involvement and contact with non-resident parents)
- Medical information (such as doctors information, allergies, medication and dietary requirements)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- School history (provided by any previous schools attended)
- Information about your physical/mental health
- Information about any Special Educational Needs
- Information about behaviour, such as details of exclusions or any relevant alternative provision put in place
- Information about assessments and attainment (such as key stage 1 and phonics results)

### Why we collect and use this data

We use the pupil data:

- to provide pupils with an education and support pupil learning
- to monitor and report on pupil progress
- to allocate the correct teaching resources and assess the quality of teaching in the school
- to provide appropriate pastoral care
- to ensure the safety of pupils whilst in our care (food allergies, emergency contact details etc.)
- and protect children from harm
- to comply with the law regarding data sharing
- to notify families of pupils of any news and important information about the school
- to support integrated health services

### The lawful basis on which we use this data

Under the General Data Protection Regulation (GDPR), the lawful bases that we process personal data under are:

- Legal obligation
- Public task
- Vital interests
- Legitimate interests **[does your school rely on this basis for any processing not covered by the Legal Obligation or Public Task bases? If not remove reference to Legitimate interests. Please see point 3.4 of the Guidance Note]**

These lawful bases for processing personal data are specified in Article 6 of the GDPR (<https://gdpr-info.eu/art-6-gdpr/>). The majority of data processing that schools undertake will relate to the performance of the public task of supporting the learning and wellbeing of pupils throughout their school life.

In addition, the lawful bases that we process special category personal data (previously referred to as 'sensitive personal data') under are:

- Compliance with employment and social security law
- Vital interests of the data subject
- Substantial public interest

These lawful bases for processing special category personal data are specified in Article 9 of GDPR (<https://gdpr-info.eu/art-9-gdpr/>). The majority of this data processing will relate to substantial public interest tasks for statutory and government purposes, as described in Part 2 of Schedule 1 of the Data Protection Act 2018 (<https://publications.parliament.uk/pa/bills/cbill/2017-2019/0153/18153.pdf>) as 'necessary for the exercise of a function conferred on a person by enactment or the exercise of a function of the Crown, a Minister or a government department.'

## Collecting pupil data

We obtain pupil information via registration forms at the start of each academic year. In addition, when a child joins us from another school we are sent a secure file containing relevant information.

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

## Storing pupil data

We hold records of pupil data for a set period of time depending on the type of information they contain. Details about how long we keep different types of records containing personal data can be found in our Retention Schedule **[insert link to Retention Schedule on school website]**

## Who we share pupil data with

The only people who have access to your personal information are staff within **[insert name of school]** whom require access in order to carry out their duties as professionals.

We will not pass your personal data to any third parties for marketing, sales or any other commercial purposes. We will not transfer your data outside of the European Economic Area. **[schools should check any arrangements with third party data processors with whom you share personal data. See point 3.6 of the Guidance Note. Can you confirm no data is shared outside the EEA?]**

Depending on the purpose for which we originally obtained your personal data and the use to which it is

to be put, it may be shared with other organisations. For example, we routinely share pupil information with the following organisations:

- any school that a pupil attends after leaving **[insert name of school]**
- our local authority (The London Borough of Hackney)
- the Department for Education (DfE)

The London Borough of Hackney uses data collected from schools to enable it to carry out specific functions for which it is responsible, such as the assessment of any special educational needs the child may have. To find out more about how The London Borough of Hackney process personal data it collects from schools, go to <https://www.learningtrust.co.uk/content/privacy-policy>

We share pupils' data with the Department for Education (DfE) on a statutory basis. All data is transferred and held securely by the DfE.

**[If you are a maintained school say:]** We are required to share information about our pupils with our local authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

**[If you are an academy or academy or free school say:]** We are required to share information about our pupils with the (DfE) under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

The pupil data that we lawfully share with the DfE through data collections:

- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- informs 'short term' education policy monitoring (School GCSE results or Pupil Progress measures).
- supports 'longer term' research and monitoring of educational policy. (for example how certain subject choices go on to affect education or earnings beyond school)

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

### **The National Pupil Database (NPD)**

Much of the data about pupils in England goes on to be held in the National Pupil Database (NPD). The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department.

It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

### **Your rights with regard to your personal data**

You have the right to:

- Parents and pupils have the right to request access to information about them that the school holds. To make a request for your personal information, or be given access to your child's educational record, contact **[insert details of DPO]**.
- withdraw consent you have given for the school to process personal information you have provided it (where personal data is processed on the basis of consent you have given for the same)
- 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 (where appropriate)
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- have personal data provided in a portable media (where personal data is processed on the basis of the consent you have given for the same).

### Who to contact if you have any concerns about how we use your personal data

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;

**[insert full contact details of school and Data Protection Officer]**

or directly to the Information Commissioner's Office at;

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

ICO helpline: **0303 123 1113**

Email: <https://ico.org.uk/concerns/>

Appendix B (for secondary schools including special schools):

[Suggested wording to give to pupils and parents at primary schools and early years providers. Please note, as a data controller **you must review and amend to reflect local needs and circumstances**. You may process data in ways that are not described by this template - please see points 3.3 to 3.6 above]

## Privacy Notice (How we use pupil data)

We **[insert name and contact details of school]** are a Data Controller for the purposes of the General Data Protection Regulation. We collect information from you and may receive information about you from your previous school. If you have any queries about this Privacy Notice please contact our Data Protection Officer **[insert full contact details of the Data Protection Officer]**.

**The categories of pupil data that we collect, hold and share include:**

- Personal information (such as name, unique pupil number and address)
- Parental contacts (name, contact details, relationship and priority in an emergency)
- Safeguarding information (such as court orders, professional involvement and contact with non-resident parents)
- Medical information (such as doctors information, allergies, medication and dietary requirements)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- School history (provided by any previous schools attended)
- Information about your physical/mental health
- Information about any Special Educational Needs
- Information about behaviour, such as details of exclusions or any relevant alternative provision put in place
- Information about assessments and attainment (such as key stage 1 and phonics results)

### Why we collect and use this data

We use the pupil data:

- to provide pupils with an education and support pupil learning
- to monitor and report on pupil progress
- to allocate the correct teaching resources and assess the quality of teaching in the school
- to provide appropriate pastoral care
- to ensure the safety of pupils whilst in our care (food allergies, emergency contact details etc.)
- and protect children from harm
- to comply with the law regarding data sharing
- to notify families of pupils of any news and important information about the school
- to support integrated health services

### The lawful basis on which we use this data

Under the General Data Protection Regulation (GDPR), the lawful basis' we rely on for processing pupil information are:

- Legal obligation
- Public task
- Vital interests
- **Legitimate interests [does your school rely on this basis for any processing not covered by the Legal Obligation or Public Task bases? If not remove reference to Legitimate interests. Please see point 3.4 of the Guidance Note]**

These lawful basis' for data processing that is necessary for our school to function are specified in Article 6 of the GDPR (<https://gdpr-info.eu/art-6-gdpr/>).

In addition, the lawful basis' for any processing activities concerning special category data are:

- Compliance with employment and social security law
- Vital interests of the data subject
- Substantial public interest

These lawful basis' are listed as conditions of GDPR - Article 9 (<https://gdpr-info.eu/art-9-gdpr/>). The majority of this data processing will relate to substantial public interest tasks for statutory and government purposes, as described in Part 2 of Schedule 1 of the Data Protection Act 2018 (<https://publications.parliament.uk/pa/bills/cbill/2017-2019/0153/18153.pdf>) as 'necessary for the exercise of a function conferred on a person by enactment or the exercise of a function of the Crown, a Minister or a government department.'

## Collecting pupil data

We obtain pupil information via registration forms at the start of each academic year. In addition, when a child joins us from another school we are sent a secure file containing relevant information.

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

## Storing pupil data

We hold records of pupil data for a set period of time depending on the type of information they contain. Details about how long we keep different types of records containing personal data can be found in our Retention Schedule **[insert link to Retention Schedule on school website]**

## Who we share pupil data with

The only people who have access to your personal information are staff within **[insert name of school]** whom require access in order to carry out their duties as professionals.

We will not pass your personal data to any third parties for marketing, sales or any other commercial purposes. We will not transfer your data outside of the European Economic Area. **[schools should check any arrangements with third party data processors with whom you share personal data. See point 3.6 of the Guidance Note. Can you confirm no data is shared outside the EEA?]**

Depending on the purpose for which we originally obtained your personal data and the use to which it is to be put, it may be shared with other organisations. For example, we routinely share pupil information with the following organisations:

- any school that a pupil attends after leaving **[insert name of school]**
- our local authority (The London Borough of Hackney)

- the Department for Education (DfE)

The London Borough of Hackney uses data collected from schools to enable it to carry out specific functions for which it is responsible, such as the assessment of any special educational needs the child may have. To find out more about how The London Borough of Hackney process personal data it collects from schools, go to <https://www.learningtrust.co.uk/content/privacy-policy>

We share pupils' data with the Department for Education (DfE) on a statutory basis. All data is transferred and held securely by the DfE.

**[If you are a maintained school say:]** We are required to share information about our pupils with our local authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

**[If you are an academy or free school say:]** We are required to share information about our pupils with the (DfE) under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

The pupil data that we lawfully share with the DfE through data collections:

- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- informs 'short term' education policy monitoring (School GCSE results or Pupil Progress measures).
- supports 'longer term' research and monitoring of educational policy. (for example how certain subject choices go on to affect education or earnings beyond school)

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

### **The National Pupil Database (NPD)**

Much of the data about pupils in England goes on to be held in the National Pupil Database (NPD). The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department.

It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

### **Your rights with regard to your personal data**

You have the right to:

- Parents and pupils have the right to request access to information about them that the school holds. To make a request for your personal information, or be given access to your child's educational record, contact **[insert details of DPO]**.
- withdraw consent you have given for the school to process personal information you have provided it (where personal data is processed on the basis of consent you have given for the same)
- 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 (where appropriate)
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- have personal data provided in a portable media (where personal data is processed on the basis of the consent you have given for the same).

### Who to contact if you have any concerns about how we use your personal data

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;

**[insert full contact details of school and Data Protection Officer]**

or directly to the Information Commissioner's Office at;

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

ICO helpline: **0303 123 1113**

Email: <https://ico.org.uk/concerns/>

### Your rights with regard to your personal data

You have the right to:

- Parents and pupils have the right to request access to information about them that the school holds. To make a request for your personal information, or be given access to your child's educational record, contact **[insert details of DPO]**.
- 
- withdraw consent you have given for the school to process personal information you have provided it
- 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

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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;

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Wilmslow

Cheshire  
SK9 5AF

ICO helpline: **0303 123 1113**

Email: <https://ico.org.uk/concerns/>

**Appendix C (for school staff):****Privacy Notice (How we use school workforce data)**

We **[insert name and contact details of school]** are a Data Controller for the purposes of the General Data Protection Regulation. We collect information from you and may receive information about you from third party organisations. If you have any queries about this Privacy Notice please contact our Data Protection Officer **[insert full contact details of the Data Protection Officer]**.

**The categories of personal data that we collect, process, hold and share include:**

- personal information (such as name, address, employee or teacher number, national insurance number)
- special categories of data including characteristics information such as gender, age, ethnic group
- contract information (such as start dates, hours worked, post, roles and salary information)
- work absence information (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught)
- banking information relating to payment of salaries
- information relating to the physical or mental health of employees if required

**Why we collect and use this personal data**

We use school workforce data to:

- enable the development of a comprehensive picture of the workforce and how it is deployed
- to meet legal requirements in reporting staffing arrangements to the Department for Education
- inform the development of recruitment and retention policies
- enable individuals to be paid

**The lawful basis on which we process this personal data**

We process this information in accordance with the General Data Protection Regulation (GDPR). Under the GDPR, the lawful basis' we rely on for processing personal information relating to staff members are:

- legal obligation
- necessary for performance of a contract
- legitimate interests

These lawful bases for processing are specified in Article 6 of the GDPR (<https://gdpr-info.eu/art-6-gdpr/>). The majority of the data processing falls under Articles 6(b) (performance of a contract)

In addition, the lawful basis for any processing activities concerning special category personal data is specified in Article 9(2)(b) of the GDPR (<https://gdpr-info.eu/art-9-gdpr/>) and Part 1 of Schedule 1 of the Data Protection Act 2018 (<https://publications.parliament.uk/pa/bills/cbill/2017-2019/0153/18153.pdf>) where the processing is necessary for the purposes of performing or exercising obligations or rights of the controller or the data subject under employment or social security law.

Statutory data processing activities such as submitting data for the school workforce census are undertaken in accordance with Article 6(c) and Article 9(2)(b) when special category personal data is involved. Submission of school workforce census returns (including a set of named staff records) is a statutory requirement on schools and local authorities by virtue of regulations made under sections 113 and 114 of the Education Act 2005. This means that:

- although schools and local authorities must meet their obligations to data subjects information law, they do not need to obtain consent for the provision of information from individual members of the workforce
- schools and local authorities are protected from any legal challenge that they are breaching a duty of confidence to staff members
- schools and local authorities must complete a return.

## Storing this data

We hold records about staff for a set period of time depending on the type of information they contain.

Details about how long we keep different types of records containing personal data can be found in our Retention Schedule **[insert link to Retention Schedule on school website]**

## Who we share this data with

We routinely share this information with:

- our local authority (The London Borough of Hackney)
- the Department for Education (DfE)

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 all 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-and-censuses-for-schools>.

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>

**[Settings need to amend and extend this list to include all other parties with whom they regularly share information. For example, academy chains / federations / Multi Academy Trusts (MATs). Once stated you also need to explain why you share the data and what makes it lawful below]**

## Why we share school workforce data

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.

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 educational attainment.

## Your rights with regard to your personal data

You have the right to:

- request access to information about you that the school holds. To make a request for your personal information contact **[insert details of DPO]**.

- withdraw consent you have given for the school to process personal information where you have provided it
- 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

### Who to contact if you have any concerns about how we use your personal data

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;

**[insert full contact details of school and Data Protection Officer]**

or directly to the Information Commissioner's Office at;

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

ICO helpline: **0303 123 1113**

Email: <https://ico.org.uk/concerns/>