

# Privacy Notice

## How we use school workforce information

The Compass Partnership of Schools is a Data Controller as defined in the General Data Protection Regulations. We collect personal information about you for the following purposes:

- To enable the development of a comprehensive picture of the workforce and how it is deployed
- To inform the development of recruitment and retention policies
- To enable individuals to be paid
- To comply with the law regarding data processing and sharing

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

The lawful bases for processing are set out in Article 6 of the GDPR. We ensure that at least one of these lawful bases apply before we collect and process yours or your child's personal information:

- **Consent:** you have given clear consent for us to process your personal data for a specific purpose.
- **Legal obligation:** the processing is necessary for us to comply with the law.
- **Contract:** the processing is necessary for a contract we have with the you, or because you have asked us to take specific steps before entering into a contract.
- **Public task:** the processing is necessary for us to perform a task in the public

interest or for our official functions, and the task or function has a clear basis in law.

In the case of special category data, such as race, ethnic origin or health, 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 UK law or a collective agreement pursuant to UK law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.

- **Legitimate interests:** the processing is necessary for our legitimate interests

### **Collecting this information**

We collect personal information via application forms, staff new starter forms and change of address forms and staff surveys.

Workforce data is essential for the Multi-academy Trust'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.

The categories of information we collect and hold include:

- personal information (such as name, employee or teacher number, national insurance number)
- characteristics information (such as gender, 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)

### **Storing this information**

We will safely and securely store your personal information for a specified length of time (retention period). These retention periods are defined in our Data Protection Policy, available from our website ([compass-partnership.uk](http://compass-partnership.uk)). We will also inform you of the retention period when we ask you for the data.

## Who do we share this information with and why?

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

We are required by law to pass some information about you to the Department for Education (DfE). We also use several external contractors to enable the day to day business functions of the Trust. Please see the table below for more information:

Organisation	Data transferred	Lawful reason for transfer	Method of transfer
Department for Education	Employee details	<b>Legal Obligation</b> - Statutory data collections under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments	Secure, encrypted upload
Royal Borough of Greenwich Schools Accounting and Payroll	Employee salary information	<b>Contract</b> - For payroll purposes	Secure, encrypted emails
MHR	Employee payslips and sickness monitoring	<b>Contract</b> - To enable staff online access to their pay and sickness information.	Secure, encrypted upload
Health & Safety Executive	RIDDOR reportable accidents	<b>Legal Obligation</b> – Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995.	Secure, encrypted upload

Survey Monkey	Anonymised personal data and responses to surveys	<b>Legitimate interests:</b> the processing is necessary for our legitimate interests	secure, <a href="#">SSL encrypted</a> connection.
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## 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:

**Nathalie Fitzgerald**  
**The Compass Partnership of Schools**  
**c/o Willow Dene School**  
**Swingate Lane**  
**Plumstead**  
**SE18 2JD**

You also have the right to:

- Obtain a copy of any data we hold about you or your child for your own purposes
- be informed about the collection and use of your personal data.
- object to processing of personal data that is
  - processed based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling)
  - for the purpose of direct marketing
  - processed for purposes of research and statistics
- in certain circumstances, have inaccurate or unnecessary personal data rectified, blocked, erased or destroyed, or to restrict the processing of this data
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means

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/>

### **Further information**

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

**Nathalie Fitzgerald**  
**The Compass Partnership of Schools**  
**c/o Willow Dene School**  
**Swingate Lane**  
**Plumstead**  
**SE18 2JD**