

PRIVACY NOTICE (HOW WE USE YOUR INFORMATION): WORKFORCE


This privacy notice has been written to inform prospective, current and former employees, including supply and agency staff, of Cockermouth School about how and why we process your personal data, including during the recruitment process.

WHO ARE WE?

Cockermouth School is a 'Data Controller' as defined by Article 4 (7) of the UK GDPR. This means that we determine the purposes for which your personal data are processed and the manner of the processing. We will only collect and use your personal data in ways that are compliant with data protection legislation.

The school has appointed Veritau Ltd as its Data Protection Officer (DPO). The role of the DPO is to monitor our compliance with the UK GDPR and the Data Protection Act 2018 and advise on data protection issues. If you would like to discuss this privacy notice or our use of your data, please contact Veritau (details below), the school's Data Manager (Amanda Moffat) or the school's Business Manager (Michael Smillie).

Schools Data Protection Officer
Veritau
West Offices
Station Rise
York
North Yorkshire
YO1 6GA
schoolsDPO@veritau.co.uk | 01904 554025

The Veritau logo, consisting of a green circle with a white triangle pointing to the right, followed by the word 'Veritau' in a dark blue, sans-serif font.

Please ensure you include the name of your school in all correspondence

WHAT PERSONAL INFORMATION DO WE COLLECT?

The personal data we collect about you includes:

- Personal identifiers, including your name, contact details, date of birth, employee or teacher number and national insurance number.
- Information about your right to work in the UK, including ID documents.
- Education and qualifications, including copies of certificates.
- Professional memberships and your qualified teacher status, where relevant.
- Your employment history, including employment references.
- Information about your workplace attendance and reasons for any absences.
- Information about professional development and performance, including reviews and any disciplinary information.
- Relevant criminal history data, including your DBS check.
- Information publicly available through online searches on shortlisted job candidates to identify any incidents or issues, related to suitability to work with children, that may need to be raised or clarified at interview.
- Emergency contact information.
- Financial and payroll data, including bank account information, tax, national insurance and pension contributions.
- Information contained in your contract, including your job role and responsibilities, start date, employment location and contracted hours etc.
- Photographs or video images of you, including CCTV footage.
- Medical information which is relevant to your employment, including any disability you disclose.
- Records of communications and interactions we have with you.
- Equality monitoring information, such as your ethnicity and gender.
- Information in relation to your use of the school's network and IT systems i.e. e-monitoring.

Please note that only limited details are held by the school in relation to supply and agency staff. In this case, the agency or similar company will be the data controller for the majority of your personal data. We therefore recommend reviewing their privacy information in addition to ours.

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WHY DO WE COLLECT YOUR PERSONAL INFORMATION?

We process your information for the purposes outlined below:

- To ensure your right to work and suitability for the role.
- To meet our safeguarding obligation to students and the school workforce.
- To pay your salary and carry out related payroll functions.
- To monitor and manage staff absence.
- To meet our health and safety obligations.
- To monitor and manage professional development, training and performance.
- To make any reasonable adjustments you may need in relation to a health condition or disability.
- To promote the school, including in newsletters, on the school website and social media platforms.
- To monitor and inform our policies on equality and diversity.

WHAT IS OUR LAWFUL BASIS FOR PROCESSING YOUR INFORMATION?

Under the UK GDPR, it is essential to have a lawful basis when processing personal information. For workforce data processing, we normally rely on the following lawful bases:

- Article 6(1)(b) – contractual obligation
- Article 6(1)(c) – legal obligation
- Article 6(1)(e) – public task

There may be occasions where our processing is not covered by one of the legal bases above. In that case, we may rely on Article 6(1)(f) – legitimate interests. We only rely on legitimate interests when we are using your data in ways you would reasonably expect.

For the processing of personal data relating to criminal convictions and offences, processing meets Schedule 1, Part 2 of the Data Protection Act 2018 as below:

- (10) Preventing or detecting unlawful acts

Some of the information we collect about you is classed as special category data under the UK GDPR. The additional conditions that allow for processing these data are:

- Article 9(2)(b) – employment and social security and social protection law
- Article 9(2)(g) – reasons of substantial public interest

The applicable substantial public interest conditions in Schedule 1 of the Data Protection Act 2018 are:

- Condition 6 – statutory and government purposes
- Condition 8 – equality of opportunity or treatment
- Condition 10 – preventing or detecting unlawful acts
- Condition 18 – safeguarding of children and vulnerable people

WHO DO WE OBTAIN YOUR INFORMATION FROM?

We normally receive this information directly from you, for example via documents and other records and information supplied by you in the course of your job application or employment period. However, we may also receive some information from the following third parties:

- Official bodies, such as the Teaching Regulation Agency and Disclosure and Barring Service.
- Your previous employers.
- Your nominated referees.
- Relevant recruitment or supply agencies.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We may share your information with the following organisations:

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- Department for Education (DfE).
- Disclosure and Barring Service (DBS).
- HM Revenue and Customs (HMRC).
- Department for Work and Pensions (DWP), if applicable.
- Your pension provider.
- Staff benefits provider, in relation to any salary sacrifice agreements.
- Your Trade Union, if applicable.
- Our suppliers and advisors, including insurers, lawyers, consultants and accountant or payroll provider.
- Our IT application providers.
- Prospective future employers, landlords, letting agents, or mortgage brokers where you have asked them to contact us for a reference.
- Relevant recruitment or supply agencies.

We may also share information with other third parties where there is a lawful basis to do so. For example, we sometimes share information with the Police for the purposes of crime detection or prevention. Appendix 1, at the end of this Notice, lists some of the other third-parties with whom we may share your information for educational purposes.

HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

We will retain your information in accordance with our Records Management Policy and Retention Schedule (<https://www.ckermouthschool.org/about-us/school-policies>). The retention period for most of the information we process about you is determined by statutory obligations. Any personal information, which we are not required by law to retain, will only be kept for as long as is reasonably necessary to fulfil its purpose.

We may also retain some information for historical and archiving purposes in accordance with our Records Management policy.

INTERNATIONAL TRANSFERS OF DATA

Although we are based in the UK, some of the digital information we hold may be stored on computer servers located outside the UK. Some of the IT applications we use may also transfer data outside the UK.

Normally your information will not be transferred outside the European Economic Area, which is deemed to have adequate data protection standards by the UK government. In the event that your information is transferred outside the EEA, we will take reasonable steps to ensure your data are protected and appropriate safeguards are in place.

WHAT RIGHTS DO YOU HAVE OVER YOUR DATA?

Under the UK GDPR, individuals have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This Notice fulfils this obligation.
- to request a copy of the personal data we hold about you.
- to request that your personal data are amended if inaccurate or incomplete.
- to request that your personal data are erased where there is no compelling reason for their continued processing.
- to request that the processing of your personal data is restricted.
- to object to your personal data being processed.

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO using the details provided above.

If we cannot resolve your concerns then you may also complain to the Information Commissioner's Office, which is the UK's data protection regulator. Their contact details are below:

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Phone: 0303 123 1113. Opening hours are Monday to Friday between 9am and 5pm (excluding bank holidays). You can also report, enquire, register and raise complaints with the ICO using their web form or live chat on [Contact us | ICO](#).

HOW GOVERNMENT USES YOUR DATA

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

- informs departmental 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 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

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.

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

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- if they are processing your personal data;
- for a description of the data they hold about you;
- the reasons they are 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, you should make a 'subject access request' to them. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:

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

To contact the department: <https://www.gov.uk/contact-dfe>.

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ADDITIONAL INFORMATION

Photographs

We will seek your consent to use your photo on our website or for marketing purposes. Please note that you can withdraw this consent at any time.

The staff image consent (or withdrawal of consent) form can be found on Firefly:

<https://cockermouth.fireflycloud.net/datasims/data-protection-1/privacy-notices-and-image-consent>.

Who, in school, has access to your personal data?

Your information will only be made available to those who need it to do their job in relation to your employment. This includes your line manager(s), the Business Manager and relevant administrative staff.

Your name and job title will be available in the staff section of the school website, and your name, job title, telephone number and office base will be available in our internal telephone directory, which is accessible to all school staff.

Where we are processing your personal data with your consent you have the right to withdraw that consent. If you change your mind, or are unhappy with our use of your personal data, please let us know by contacting the school's Data Manager.

CHANGES TO THIS NOTICE

We reserve the right to change this privacy notice at any time. We will normally notify you of changes that affect you. However, please check the school website regularly to ensure you have the latest version (<https://www.cockermouthschool.org/about-us/school-policies>).

This privacy notice was last reviewed in March 2023.

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APPENDIX 1:

Sharing Data with other Third Parties

It may be necessary to share data with some third parties outside of the DfE who, for example, provide software that helps with the day-to-day running of the school. This is not an exhaustive list and will be updated periodically. Examples and context include:

| Third Party | Context | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|----------------------|-----------|-----------------------------|-------|---------------|-----|--------------------------|--------------------|------------------------|--------------------------|--------------------|------------------|-----------------------|-----|------------------------------------|------------------|-------------------------|---------|-----------------------|-------|-----------------|-----------|--------------------|--------------------|-----------------|-------|------------------------------------|------------------------------|
| Alps (Alchemy Gold Ltd) | Analytical tool for Key Stage 4 & 5 progress monitoring. Staff logins. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Apple Inc. | Apple School Manager | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CPOMS (Meritec Ltd) | Safeguarding & child protection monitoring: staff names. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CRB Cunninghams | Biometric data for cashless catering. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Cumbria County Council | Health & Safety information. Switch Access System – child protection data sharing. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Cumbria Work Experience | Work Experience website/database. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Disclosure and Barring Service | Criminal records checking service. Safe recruitment. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Duke of Edinburgh's Award | Staff names and email addresses. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Education Software Solutions (ParentPay) | School Management System: SIMS.net – staff details, emergency contacts, medical information, employment contract information. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Edukey Education Ltd | Class Charts: seating plans, behaviour & attendance. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EduLink One (Overnet Data) | Parental Engagement (messaging, data collection), registers, assessment. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Evolve | Educational visits online. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Facebook Inc. | Department pages – locked accounts for invited staff & students. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Firefly Learning Ltd | Virtual Learning Environment: parent and student access to timetables, homework, contact details. Resource sharing for staff. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Fit for Life | Occupational Health consultants. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Google LLC | Google Drive document storage and sharing. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| InVentry Limited | Sign-in solution: Staff, students & visitors. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| JAMF Software LLC | Jamf School: iPad – user groups management | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Just People HR | Human Resources consultant and employment law advice. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Kym Allan Associates | Health & Safety consultants. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Microsoft UK | Microsoft Office/365/OneDrive. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| North Yorkshire C Council | Staff Salary information. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PaperCut MF/PaperCut NG | Document scanning software. Held by PaperCut servers in encrypted format for 24 hours then deleted. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| School Cloud Systems Ltd | Online Parents' Evening booking system. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| SISRA Ltd | Student progress data analysis. Staff names and logins. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| sQuidcard Ltd | Online payments: cashless catering / school trips. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Subject Software | <table border="0"> <tr> <td>ArcGIS (ESRI)</td> <td>Geography</td> </tr> <tr> <td>BandLab Technologies</td> <td>Music</td> </tr> <tr> <td>Bebras</td> <td>ICT</td> </tr> <tr> <td>Carousel Learning</td> <td>Science assessment</td> </tr> <tr> <td>Classoos UK Ltd</td> <td>Online virtual textbooks</td> </tr> <tr> <td>Code Combat</td> <td>Computer Science</td> </tr> <tr> <td>Craig 'n' Dave</td> <td>ICT</td> </tr> <tr> <td>Creative Learning Solutions</td> <td>Food & Nutrition</td> </tr> <tr> <td>Doublestruck Ltd</td> <td>Various</td> </tr> <tr> <td>Dr Frost Maths</td> <td>Maths</td> </tr> <tr> <td>Duolingo</td> <td>Languages</td> </tr> <tr> <td>Educake Ltd</td> <td>Science Assessment</td> </tr> <tr> <td>Eedi Ltd</td> <td>Maths</td> </tr> <tr> <td>EPI Language Learning Group</td> <td>The Language Gym – Languages</td> </tr> </table> | ArcGIS (ESRI) | Geography | BandLab Technologies | Music | Bebras | ICT | Carousel Learning | Science assessment | Classoos UK Ltd | Online virtual textbooks | Code Combat | Computer Science | Craig 'n' Dave | ICT | Creative Learning Solutions | Food & Nutrition | Doublestruck Ltd | Various | Dr Frost Maths | Maths | Duolingo | Languages | Educake Ltd | Science Assessment | Eedi Ltd | Maths | EPI Language Learning Group | The Language Gym – Languages |
| ArcGIS (ESRI) | Geography | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BandLab Technologies | Music | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Bebras | ICT | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Carousel Learning | Science assessment | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Classoos UK Ltd | Online virtual textbooks | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Code Combat | Computer Science | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Craig 'n' Dave | ICT | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Creative Learning Solutions | Food & Nutrition | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Doublestruck Ltd | Various | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dr Frost Maths | Maths | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Duolingo | Languages | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Educake Ltd | Science Assessment | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Eedi Ltd | Maths | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EPI Language Learning Group | The Language Gym – Languages | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| Third Party | Context |
|---------------------|--|
| | <p> Fast Tomato Personal Development Gapminder Geography quizzes H & A Learning Ltd Hegarty Maths Hachette UK Ltd Hodder Education – online textbooks, Geography. Headstart (annafreud.org) Personal Development Historyhomework.com History iDEA.org.uk: ICT isaacphysics.org Science Dept Kahoot! AS Psychology Memrise Ltd ICT, Geography, Languages mrfrazer ICT No More Marking English assessment Oxford University Press: Kerboodle: ICT, Languages, Psychology MyMaths Mathematics Pearson Education Ltd ActiveLearn – History, Maths Quizizz Inc Recall tests – Geography Quizlet Inc ICT, Psychology Ridgwell Press Ltd The Nutrition Program – Food & Nutrition Seesaw Learning Inc. Online Learning Tool – Food & Nutrition Seneca Learning Ltd Revision & Homework tool (English & History) Sentence Builders MDLSoft TaskMagic CB – Languages Sparx Maths Maths assessment TED-ed Geography Vespa Mindset Sixth Form PD Virtual College Food & Nutrition </p> |
| Tempest Photography | School photographs. Photos are encrypted. |
| Twitter Inc | Department accounts for sharing student success. |
| UCAS | University and College Admissions Service. |
| Wonde Ltd | Secure data transfer between the school's database and third-party products such as Class Charts and EduLink. |