



Staploe Education Trust

Privacy notice for the Trust workforce

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1. Introduction

Under UK data protection law, individuals have a right to be informed about how our Trust uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage to work in our trust.

Our trust, the Staploe Education Trust, are the 'data controller' for the purposes of UK data protection law.

Our data protection officer is the Operations Director (see 'Contact us' below).

The Trust is registered with the Information Commissioner's Office and follows the principles of the UK GDPR. This privacy notice covers all schools within the Trust.

2. The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Personal information (such as name, gender, date of birth and employee or teacher number and national insurance number)
- Contact information (such as address and telephone numbers)
- Contract information (such as start date, hours worked, post, roles and salary information)
- Work absence information (such as number of absences and reasons)
- Qualifications
- Recruitment information (such as applications, references, DBS checks and Right to Work documents)
- Payroll information (including bank details)
- Images of staff through photographs and videos

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" under UK GDPR. This includes, but is not restricted to, information about:

- Personal data revealing racial and ethnic origins
- Personal data revealing political opinions
- Personal data revealing religious or philosophical beliefs
- Personal data revealing sexual orientation
- Biometric data
- Medical data (including but not limited to any physical and mental health conditions, special educational needs or disabilities)
- Images of staff captured from CCTV around the site
- Locational data (such as door access entry/exit records)

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

3. Why we use this data

We use the data listed above to:

- Facilitate safer recruitment, as part of our safeguarding obligations towards pupils
- Ensure the safety and welfare of our staff
- Allow better financial modelling and planning
- Inform the development of recruitment and retention policies
- Enable equalities monitoring
- Support effective performance management
- Assess the quality of our services
- Support the work of the School Teachers' Review Body

- Enable you to be paid
- Support pension payments and calculations
- Enable sickness monitoring
- Enable leave payments (such as sick pay and maternity leave)
- Meet statutory reporting obligations
- Detect/prevent crime (CCTV footage)
- Comply with the law regarding data sharing

3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send marketing information by email promoting school events, campaigns, charitable causes or services that may be of interest.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

3.2 Use of your data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

4. Our lawful basis for using this data

The lawful bases for processing are set out in Article 6 of the UK GDPR. At least one of these must apply whenever you process personal data.

- In accordance with Article 6 (a) Consent we will process data to:
 - Operate Trust systems that use Biometric data such as cashless catering systems
- In accordance with Article 6 (b) Contract we will process data for:
 - The performance of your employment contract
- In accordance with Article 6 (c) Legal obligation we will process data to:
 - Comply with a legal obligation to which the Trust is subject (such as our legal duty to safeguard pupils)
 - To keep you safe and well. For example, who to contact if there is a medical emergency.
- In accordance with Article 6 (d) Vital Interests we will process data to:
 - Protect the vital interests of the data subject or of another natural person (such as protecting pupils from harm)
- In accordance with Article 6 (e) Public task we will process data to:
 - Allow the necessary running of the Trust, our academies and provide education
 - Monitor our ICT systems
 - Carry out investigations or look into complaints

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation

- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

5. Collecting this data

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Previous employers
- Government departments or agencies
- Police forces, courts, tribunals

6. How we store this data

We keep personal information about you while you work for our Trust. We may also keep it beyond your employment for our Trust if this is necessary. Our Data Retention Policy sets out how long we keep information about staff.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

7. Who we share data with

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

Where it is legally required or necessary (and it complies with UK data protection law), we may share personal information about you with:

- Cambridgeshire County Council
- the Department for Education
- Ofsted
- Exam Boards
- Our Auditors
- EPM
- Next of kin
- HM Revenue and Customs
- Health authorities or providers

- Trade unions and associations
- Professional bodies
- Employment and recruitment agencies
- Suppliers including those who provide services such as payroll, HR systems, cashless catering, and Management Information Systems.
- Law enforcement agencies
- Pension Provider

We are required to share information about our workforce members to both the Department for Education (DfE) and Local Authorities for the purpose of data collection and safeguarding under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

7.1 Department for Education

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>

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.

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>

7.2 Transferring data internationally

We do not normally transfer information outside the UK. Where it is necessary, we will try to ensure adequacy in the country's data protection laws. Where we cannot ensure adequacy, we will communicate you about the risks and ensure additional consent is given for the specific use.

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

8. Your rights

8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that apply):

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

8.2 Your other rights regarding your data

Under UK data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

9. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

10. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer by email at DPO@staploeducationtrust.org.uk or write to Data Protection Officer,

Staploe Education Trust,
Soham Village College,
Sand Street,
Soham,
Cambridgeshire,
CB7 5AA