

Privacy Notice for Staff



Dartmoor
MULTI ACADEMY TRUST

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| 1.0 | 23 May 2018 | N McDermott | First Published |
| 2.0 | 18 Oct 2018 | N McDermott | Second edition. Updated Categories of information (use of staff images / details on school websites in line with good practice guidance from DfE). Simplified section headers. |
| 3.0 | 12 Mar 2020 | N McDermott | Updated 2a to include reference to personal and work email address. Update references to 'school' to 'Trust.' |

1. Privacy Notice (How we use workforce information)

Under data protection law, individuals have a right to be informed about how their employer uses any personal data held about them. The Dartmoor Multi Academy Trust is the data controller for the purposes of data protection law.

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

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by its employees and service providers in the performance of their duties.

Our data protection officer is Nuala McDermott (see 'Contact us' below).

This policy has been written with consideration given to working practices. By adopting this policy, a reduction in workload has been facilitated by reducing the need for individual academies to interpret the policy locally.

2. The categories of information that we process include:

We process data relating to those we employ, or otherwise engage, to work at our Trust. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- a) personal information (such as name, employee or teacher number, national insurance number, date of birth, personal email address, work email address)
- b) next of kin and emergency contact numbers
- c) contract information (such as start date, hours worked, post, roles and salary information, annual leave, pension and benefits information)
- d) work absence information (such as number of absences and reasons)
- e) bank account details, payroll records, National Insurance number and tax status information
- f) recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process

- g) qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- h) performance information
- i) outcomes of any disciplinary and/or grievance procedures
- j) photographs, for ID badges, or to identify our staff to the wider public. We follow [DfE guidance](#) in displaying staff details and roles via our schools' websites and notice boards, to give pupils and parents a clear picture of who is working for our Trust.
- k) CCTV footage
- l) Data about your use of the information and communications systems in your place of work

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- a) Race, ethnicity, religious beliefs, sexual orientation and political opinions
- b) Trade union membership
- c) Health, including any medical conditions, and sickness records

This list is not exhaustive.

Why we collect and use workforce information

The purpose of processing this data is to help us run the Trust, including to:

- a) Enable you to be paid
- b) Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- c) Support effective performance management
- d) Inform our recruitment and retention policies
- e) Allow better financial modelling and planning
- f) Enable equalities monitoring
- g) Improve the management of workforce data across the sector
- h) Support the work of the School Teachers' Review Body
- i) Enable the development of a comprehensive picture of the workforce and how it is deployed
- j) Meet audit or statutory requirements e.g. with regard to expenses claims.

The lawful basis on which we process this information

Personal information is collected from you in order to meet and discharge our contractual obligations and statutory duties as your employer.

If you fail to provide the personal information requested, amongst other things we may not be able to provide you with employment or a service for which you may be entitled/requested.

The legal basis for the use of your personal data will be one or more of the following:

- a) to satisfy our legal obligations and statutory duties as your employer.
- b) to carry out a task in the public interest or in the exercise of official authority in our capacity as a Trust.
- c) to meet our contractual obligations in relation to your statement of employment contract with us.
- d) We need to protect your vital interests (or someone else's interests)
- e) We have legitimate interests in processing the data – for example providing data to pensions providers or third party health and wellbeing providers

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the Trust's use of your data.

Collecting workforce information

We collect this information in a variety of ways. For example, data is collected through application forms; from forms completed by you at the start of or during employment; data collection forms; computer records; signing in/out records; CCTV footage; biometric capture for the purposes of charging for meals; from your passport or other identity documents such as your driving licence; from correspondence with you; or through interviews, meetings or other assessments (for example, team development/appraisals).

In some cases, we collect personal data about you from third parties. For example, references supplied by former employers and/or information from criminal records checks (known as DBS checks) permitted by law.

Workforce data is essential for the Trust's / local authority'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.

Storing workforce information

Personal data is stored in a range of different places, including your Trust personnel file, single central records, SIMS, IT systems of the Trust's HR and Payroll provider, and in other IT systems (including the Trust's email system). The information is kept secure and is only used for purposes directly relevant to your employment, or for audit and census information.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with the Trust's Records Management policy.

Who we share workforce information with

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

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

- a) other schools within Dartmoor Multi Academy Trust
- b) the local authority
- c) The Department for Education
- d) Your family or representatives
- e) Educators and examining bodies
- f) Regulatory bodies e.g. Ofsted
- g) Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll or employee wellbeing
- h) Financial organisations
- i) Central and local government
- j) Our auditors
- k) Survey and research organisations
- l) Trade unions and associations
- m) Health authorities
- n) Security organisations
- o) Health and social welfare organisations
- p) Professional advisers and consultants

- q) Charities and voluntary organisations
- r) Police forces, courts, tribunals
- s) Professional bodies
- t) Employment and recruitment agencies

Requesting access to your personal data

You can ask for a copy of the data we hold about you by making a 'subject access request'. If you make a subject access request and we hold information about you, we will:

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

If you would like to make a request, please contact our data protection officer

dpo@dartmoormat.org.uk

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.

To make a complaint, you can contact our data protection officer on:

- Email dpo@dartmoormat.org.uk
- Call 07837 652508

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

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

This notice is based on the [Department for Education's model privacy notice](#) for the school workforce, amended to reflect the way we use data in this Trust.