

Privacy Notice for Staff

Document control		POLICY LEVEL: Trust / Statutory (GDPR)	
Approved by	Full Trustees	Approved Date	17 March 2022
Portfolio	Data Protection	Next Review	01 March 2024
Published Location	https://www.dartmoormat.org.uk/policies-and-documents.html		
Version	Date issued	Author	Update information
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.'
3.1	22 Oct 2020	N McDermott	Addition of S8, 10, 11 in line with DfE updates Sept 2020
3.2	03 Mar 2022	J Coundon	Added articles to lawful basis. Amendments to collecting workforce data, storing workforce data. Who we share information with, local authority, requesting access to personal data. Updated DPO contact details

Privacy Notice (How we use workforce information)

Dartmoor Multi Academy Trust collect, hold, use, and share information about our workforce. This is known as “personal data” and you have rights around that data, including knowing how and why we are processing the data. “Processing” data means from collecting, storing, using, sharing and disposing of it. We collect, hold and share personal information on the Trust workforce. The Trust workforce includes all those employed to teach, or otherwise engaged to work, either on a paid, contracted or voluntary basis, at the Trust

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:

- personal information (such as name, employee or teacher number, national insurance number, date of birth, personal email address, work email address)
- characteristics information (such as gender, age, ethnic group)
- next of kin and emergency contact numbers
- contract information (such as start date, hours worked, post, roles and salary information, annual leave, pension and benefits information)
- work absence information (such as number of absences and reasons) and associated medical information
- bank account details, payroll records, National Insurance number and tax status information
- 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

- qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- performance information
- outcomes of any disciplinary and/or grievance procedures
- photographs and CCTV
- CCTV footage
- 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):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- 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:

- Enable you to be paid
- Facilitate safer recruitment as part of our safeguarding obligations towards pupils
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable equalities monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body
- Enable the development of a comprehensive picture of the workforce and how it is deployed
- Meet audit or statutory requirements e.g., expense claims
- For site security
- To detect and prevent crime and combat fraud

Lawful Basis

Personal information is collected from you in 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:

Article 6(a) - Consent (for any processing which does not fall into the bases detail within this section below)

- Article 6(a) - Consent (for any processing which does not fall into the bases detail within this section below)
- Article 6(b) Contract (your contract of employment)
- Article 6(c) - Compliance and Legal Obligation

In particular, but not exclusively, section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments:

- Article 6(e) - Public Interest
- Article 6(f) – Legitimate Interest (for example providing data to pensions providers or third party health and wellbeing providers)

In addition, we rely on GDPR Article 9 and the Data Protection Act 2018 Schedule 1 Part 1 and Part 2 concerning any special category data (personal data that needs more protection because it is sensitive). Please refer to our Special Category Data Policy document for full details of these lawful bases for processing this data.

How we Collect Workforce Information

Workforce data is essential for the operational use. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. To comply with data protection legislation, we will inform you at the point of collection, whether you are required to provide certain information to us and your rights in relation to this.

We collect this information in a variety of ways.

- data collected through application forms
- forms completed by you at the start of or during employment
- data collection forms
- 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;
- through interviews, meetings, or other assessments (for example, team development/appraisals)
- self-certification forms (medical)
- Fit Notes
- images provided by individuals or taken using school photographic equipment
- local authorities
- previous employers
- NHS
- Police
- Disclosure and Barring Service
- Department for Education

Storing Workforce Information

Personal data is stored in a range of different places, including your Trust personnel file, single central records, Arbor, IT systems such as our payroll processor and cloud storage. The information is kept secure and is only used for purposes directly relevant to your employment, or for audit and census information. Secure storage is provided for paper-based records.

We hold data securely for the set amount of time shown in our data retention schedule.

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:

- other schools within Dartmoor Multi Academy Trust
- the local authority
- The Department for Education
- Your family or representatives
- Educators and examining bodies
- Regulatory bodies e.g. Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll or employee wellbeing
- Central and local government
- Our auditors
- Survey and research organisations
- Trade unions and associations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies
- Employment and recruitment agencies

Central Government

We are required to share information about our workforce members with central Government within twenty-seven days of receiving a request from the Secretary of State, under section 7 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

This may include, but no limited to, matters relating to the following:

- payroll
- contracts
- Occupational Health

Requesting Access to Your Personal Data

Under data protection legislation, you have the right to request access to information about you that we hold. You can ask for a copy of the data we hold about you by making a 'subject access request'.

If you would like to make a request, please contact our data protection officer dpo@dmatschools.org.uk

Your Rights

You also have the right to:

- be informed about the collection and use of your personal data
- rectification, i.e., to have inaccurate personal data rectified, or completed if it is incomplete
- erasure, often known as the 'right to be forgotten'; however this does not apply where, amongst other things, processing is necessary to comply with a legal obligation
- restrict processing, although, as above this is a limited right.
- object; though other than for marketing purposes, this is also limited as above.
- object to decisions being taken by automated means, although these are not currently relevant
- Where we rely on your consent to process your data, you have the right to revoke that consent.
- a right to seek redress, either through the ICO, or through the courts

Last updated

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated on 3rd March 2022.

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@dmatschools.org.uk

Phone: 01629 532888

Room 396,
North Block,
County Hall,
Smedley Street,
Matlock,
Derbyshire,
DE4 3AG

For DfE:

Public Communications Unit,
Department for Education,
Sanctuary Buildings,
Great Smith Street,
London, SW1P 3BT
Website: www.gov.uk/contact-dfe
Telephone: 0370 000 2288

If, however you are dissatisfied with our response to your concerns you can of course contact the ICO quoting our ICO registration number ZA362232 and stating that the Data Controller is Dartmoor Multi Academy Trust

Information Commissioners' Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

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