Privacy Notice for staff and volunteers

Where this Privacy Notice states 'Schools' it shall mean all the Academies in Inclusive Education Trust.

In this privacy notice 'we', 'us' and 'our' means the Inclusive Education Trust and/or Academy Schools.

This privacy notice explains how the School collect, store and use your personal data when you provide the School with information. The School needs to hold personal information about you on the School computer systems and in paper records to help with the daily running of the School.

The School is the data controller of the personal information we process and is responsible for its accuracy and safe-keeping. Please help to keep school records up to date by informing us of any change of circumstances.

Senior school staff and in some circumstance's administration staff have access to your records to enable them to do their jobs. Anyone with access to your record is properly trained in confidentiality issues and is governed by a legal duty to keep your details secure, accurate and up to date. All information about you is held securely, and appropriate safeguards are in place to prevent loss.

In some circumstances the School may be required by law to release your details to statutory or other official bodies, for example if a court order is present, or in the case of public educational matters. In other circumstances you may be required to give written consent before information is released.

In some cases, your data may be outsourced to a third-party processor. Where the School outsources data to a third-party processor the same data protection standard that the School upholds are imposed on the processor.

The School Data Protection Officer will oversee and monitor the School's data protection procedures and ensure the School remain compliant with the UK General Data Protection Regulation and the Data Protection Act 2018.

Within this Privacy Notice the School workforce refers to those employed to teach, volunteers or are otherwise engaged to work at the School.

The personal data the School collect, hold and share includes:

- Personal information (such as name, employee or teacher number, national insurance number, address, date of birth, marital status and gender)

- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Contract information (such as start dates, hours worked, post, roles, references and recruitment information)
- Right to work information
- Disclosure and Barring Information (criminal convictions)
- Work absence information (such as number of absences and reasons)
- Qualifications and employment records including work history, job titles, working hours, training records and professional memberships
- Performance information and outcomes of any disciplinary and/or grievance procedures
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Relevant medical and dietary information
- Financial information including bank details
- Photographs (for internal safeguarding and security purposes, school newsletters, social media (including the School website, Facebook page and X)
- Copy of driving licence/birth certificate
- CCTV Images

This list is not exhaustive

What is 'Special Category' personal information?

Some information is 'special' and needs more protection due to its sensitivity. It's often information you would not want widely known and is very personal to you. We may collect this information for staff recruitment, administration and management:

- sexuality and sexual health
- religious or philosophical beliefs
- ethnicity
- physical or mental health
- trade union membership
- political opinion
- genetic/biometric data

Where the School collects 'special category' data, we only use it when:-

◊ We have explicit consent;

◊ Processing is necessary to protect an individual's vital interests

◊ Processing is necessary for reasons of substantial public interest

and as set out in UK Data Protection Law. Please see our data protection policy for further information.

Why the School collect and use your information

The purpose of processing this data is to help run the School including to:

- ◊ Enable the development of a comprehensive picture of the workforce and how it is deployed
- ◊ Inform the development of recruitment and retention policies
- ◊ Enable individuals to be paid
- ◊ Enabling ethnicity and disability monitoring
- ◊ Facilitate safe recruitment as part of the School safeguarding obligations
- ◊ Support effective performance management
- ◊ Allow better financial modelling and planning

The lawful basis on which the School use this information

The School will only collect and use personal information about you when the law allows us to. Most commonly the School will use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

The School process this information under:

- Article 6(1)(b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- Article 9(2)(b) processing is necessary for the purpose 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 Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.

Whilst the majority of the personal data you provide to the School is mandatory, some is provided on a voluntary basis. When collecting data, the School will inform you whether you are required to provide this data or if your consent is needed. Where consent is required, the School will provide you with specific and explicit information with regards to the reasons the data is being collected and how the data will be used.

In circumstances where the School have consent to use your personal information, you have the right to remove it at any time. If you want to remove your consent, contact the School's Data Protection Officer.

How long is your data stored for?

The School hold workforce data whilst in employment with the School, and for 6 years following the date you leave the organisation. Where the School feels the need for the data to be retained for longer, for example in the case of a possible employment tribunal, the information will be stored for up to 6 years after the full completion of the case or in compliance with School's retention schedule.

Who the School share workforce information with?

The School do not share information with anyone without consent unless the law and policies allow the School to do so.
The School are required to share information about the School workforce members with the local authority (LA) under section 5 of the Education (Supply of information about the School workforce) (England) Regulation 2007 and amendments.

The School share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation and links to school funding/expenditure and the assessment education attainment.

Where necessary or required the School may also share information with:

- School staff and boards
- The Local Authority including commissioned providers of Local Authority services
- Financial organisations including HMRC
- NHS and healthcare professionals
- Social and welfare organisations
- Law enforcement organisation and courts
- Current, past or prospective employers
- Voluntary and charitable organisations
- Business associates and other professional advisers
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as HR, our Data Protection Officer and recruitment support
- Security organisations
- Press and the media
- School trip organisations
- External auditors
- Employee benefit schemes

Your Rights

You have the right to ask the School for copies of your personal information. This right always applies and is commonly known as making a 'subject access request'. There are some exemptions, which means you may not always receive all the information the School process for example, if information is likely to cause serious harm to the physical or mental health or condition of you or any other person.

Employment references are provided in confidence by the School and may be exempt from disclosure when submitting Subject Access Request.

Information relating to or provided by a third person who has not consented to the disclosure, including images removed or obscured may be withheld. If the School can't give you some or any of the information, the School will tell you why.

If you make a subject access request, and if the School do hold information about you the School will:

- Give you a description of it
- Tell you why the School are holding and processing it, and how long the School will keep it for
- Explain where the School 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

To make a request for your personal information, please contact the School data protection officer clearly stating:

- Your name and contact details
- The Information you want
- Any details or relevant dates that will help the School process your request.

You also have the right to:

- object to processing of personal data in some circumstances.
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection Regulation

Article 22 of the UK GDPR has additional rules to protect individuals from decisions made solely for the purpose of automated decision-making and profiling. The School does not carry out any automated decision-making and/or profiling on the workforce.

How the School use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

The School use traffic log cookies to identify which pages are being used. This helps the School analyse data about web page traffic and improve the School website to tailor it to customer needs. The School only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help the School provide you with a better website, by enabling the School to monitor which pages you find useful and which you do not. A cookie in no way gives the School access to your computer or any information about you, other than the data you choose to share with the School.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Further information on deleting and controlling cookies can be found at:

- www.aboutcookies.org
- www.allaboutcookies.org

Contact Us

If you have any queries about how your personal information is handled contact the School Data Protection Officer by email: info@dpenterprise.co.uk

Complaints

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

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

Alternative, you can make a complaint to the Information Commissioner:

Report a concern online

casework@ico.org.uk

0303 123 1113

Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

We may need to update this privacy notice from time to time so we recommend that you revisit this information. We may also notify you in other ways from time to time about the processing of your personal information. This version was last updated in September 2024.