

## Privacy Notice for Staff

Under data protection law, individuals have a right to be informed about how the school 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 at our school.

We, The Consortium Trust are the 'data controller' for the purposes of data protection law. **Our data protection officer is:** Andrew Aalders-Dunthorne, CEO & Principal of The Consortium Multi-Academy Trust who can be contacted at 27 Norwich Road, Halesworth, Suffolk, IP19 8BX or by email at: [a.aalders-dunthorne@consortiumtrust.org](mailto:a.aalders-dunthorne@consortiumtrust.org).

### **The personal data we hold**

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

- Contact details, date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits 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 and Professional Development Reviews
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence, passport, bank statement or utility bill for identification verification purposes
- Photographs
- CCTV footage (if applicable)
- Data about your use of the school's information and communications system

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

### **Why we use this data**

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

- Enable you to be paid
- Facilitate safe 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 ethnicity and disability monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body

### **Special considerations for digital learning**

The Trust uses google classroom to offer a remote digital learning platform including live and recorded teaching. It is noted that these lessons will capture personal data of teachers and may capture personal data of other stakeholders attending the lesson, but also potentially those that are not attending, for instance, comments made about others during the lessons.

The Consortium Trust, appreciates that additional measures are required due to the Trust's requirement for staff and pupils to engage in our remote digital learning platform. We note that teaching and learning from home is different to attendance in the classroom, we will at all times act to protect the privacy and personal data of all stakeholders.

This Privacy notice should be read in conjunction with the following Trust Policies:

- Online Safety;
- Mobile Devices;
- Safeguarding;
- Data Protection (GDPR).

Limitation of purpose: Recorded and live online lessons will not be used to judge competence or used as part of the performance management cycle. As is the case with teaching in the classroom, the Trust cannot guarantee that parental complaints will not be made, however, the Trust will not take into account complaints based on online observations from third parties. Notwithstanding any exceptional circumstances.

Data minimisation: Any recordings should only contain what is adequate, relevant and limited to the subject-matter being taught and should not contain unnecessary personal information, controversial opinions or comments that may cause offence. We will ensure that data held by the Trust remains professional in nature. All resources and recordings remain the intellectual property of the Trust, until a time that the Trust seeks to legally and legitimately dispose of them.

**Storage:** The Trust will not retain the recordings for longer than necessary. Lesson recordings that are single use will be held and then deleted within 28 days of the recording. Where a ‘teaching session’ is recorded to be part of a scheme of work may be retained indefinitely – similar to other recorded teaching resources.

**Security:** In line with the supporting policies as outlined above the Trust will ensure that appropriate security measures are in place to ensure confidentiality, integrity and the appropriate use of materials recorded.

### **Our lawful basis for using this data**

We only collect and use personal information about you when the law allows us to. Most commonly, we 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
- Less commonly, we may also use personal information about you where:
  - You have given us consent to use it in a certain way
  - We need to protect your vital interests (or someone else’s interests)
- We have legitimate interests in processing the data – for example, where:

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 go about withdrawing consent if you wish to do so. Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school’s use of your data.

### **Collecting this information**

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us. 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.

### **How we store this data**

We keep personal information about staff while they are employed by our Trust and schools. We may also keep it beyond your employment if this is necessary, in order to comply with our legal obligations.

All employee records are kept securely at all times. Paper records, for example, are kept in lockable storage areas with restricted access, and the contents are secure within the file. Equally, electronic records have appropriate security.

Access arrangements for employee records ensure that confidentiality is maintained whilst equally enabling information to be shared lawfully and appropriately, and to be accessible for those authorised to see it.

### **Data sharing**

We do not share information about you with any third party 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:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and staff dismissals
- The Department for Education
- Your family or representatives
- Educators and examining bodies
- Our regulator e.g. Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as Payroll, HR, Pensions, Occupational Health Providers, Staff Reward Schemes etc
- Financial organisations
- 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

### **Transferring data internationally**

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

### **Your rights - How to access personal information we hold about you**

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them. If you make a subject access request, and if we do hold information about you, we will:

- 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 our data protection officer.

### Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to 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, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations
- To exercise any of these rights, please contact our data protection officer.

### 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, please contact our data protection officer.

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

### 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: **Mr Andrew Aalders-Dunthorne, CEO, Consortium Trust, 27<sup>th</sup> Norwich Road, Halesworth, Suffolk, IP19 8BX.**

*This notice is based on the [Department for Education's model privacy notice](#) for the school workforce,*