

An Daras Multi Academy Trust

Data Privacy Notice for Staff

We, An Daras Multi Academy Trust registered at Unit 4 Tamar Business Park, Pennygillam Way, Pennygillam Industrial Estate, Launceston, Cornwall, PL15 7ED, are the 'Data Controller' for the purposes of data protection law. Our Data Protection Officer is Glyn Pascoe (see 'Contact us' section below).

What is a 'privacy notice'?

A privacy notice is often called a 'fair processing notice' and is designed to inform individuals when data about them is collected, held and processed.

Typical examples of personal data are:

- Contact details such as name, address, phone numbers, email addresses
- Date of birth
- Marital status
- Gender
- Country of birth
- National Insurance number
- Emergency contact information
- HR related aspects such as salary, annual leave, pension and benefits, recruitment information including right to work documentation, references, CV and any other documents relating to the recruitment process
- Qualifications and employment records, including work history, working hours along with training and professional memberships
- Financial details such as bank account information
- Work-related performance information including supporting evidence relating to disciplinary procedures, absence and related data
- Supporting collateral for the above, e.g. driving license, passport, birth certificate, photographs
- CCTV footage collected from our site(s)
- Usage data relating to interactions with our IT systems

The above should be viewed as a non-exhaustive list and additional data may be stored where it is deemed relevant.

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

What is the purpose of holding the data?

- To enable financial transactions e.g. payroll and/or billing
- Statutory reporting e.g. to demonstrate equal opportunities employment
- To support efficient administration (e.g. performance reviews and workforce data)
- To provide safe recruitment in line with government/group/local authority best practise

What is our lawful purpose?

Data must only be collected and processed when allowable by law. Typically this is when:

- We are required to process data to fulfil a contract or deliver a service
- We are required to hold data to comply with legal obligations
- It is in the public interest to do so

In addition to the above, it is allowable to hold/process personal data when we have received explicit consent to do so and/or to protect your or someone else's vital interests.

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 Multi Academy Trust's use of your data.

How is information collected?

Personal data will fall into two categories: mandatory (in as much as you must comply with the request to provide the data) and optional (where there is a choice whether to supply information or not). As a Data Controller, we must highlight to you which of the above scenarios is applicable.

How is data stored?

Personal data is kept secure and may only be used for the purposes relevant to administering your employment. At the point of your employment being terminated by either party, the data will be subject to our standard retention period.

A copy of this schedule can be obtained from the [Information and Records Management Society's Toolkit for Schools](#).

How we share your data

Data will not be shared with any third party without your consent unless either allowable by law or indicated as part of our policies. Assuming either of the above apply, data can be shared with:

- Central government and our local authority – to meet our legal obligations to share certain information with them, such as safeguarding concerns
- The Department for Education – to meet our legal obligations to share certain information with it, such as workforce census returns
- Our regulator Ofsted – to meet our legal obligations such as safeguarding and assessment monitoring data etc.
- Suppliers and service providers – to enable them to provide the service we have contracted them for such as contact information for text / SMS / app messaging services
- Financial organisations – to enable them to provide the service we have contracted them for, such as bank account details to enable paying of invoices and monthly pay runs etc.
- Our auditors – to meet our legal obligations and to assess the quality of our services, such as pay-related information
- Trade unions and associations – to meet our legal obligations, such as safeguarding
- Professional advisers and consultants – to support pupil learning and enable them to provide the service we have contracted them for, such as training needs/support and performance management
- Police forces, courts, tribunals – to meet our legal obligations to share certain information with them, such as safeguarding
- Employment and recruitment agencies – to support safer recruitment obligations, such as number of days absent, safeguarding and any active disciplinary on file

Where allowable and appropriate, data may be transferred outside of the EEA (European Economic Area) in accordance with the Data Protection Act 2018.

How can I see what personal information is held about me? Your rights

To gain access to a report of the data held about you, please complete a 'subject access request'. If we do hold information about you we will provide the following information:

- A description of the data
- A reason for holding the data
- Where we obtained the data if not from you or your child
- How long the data will be retained for
- Whether the data has been shared and with whom
- Whether any automated decision-making has been applied

- A copy of the data in an intelligible format

Upon receiving the request we will produce the report within 15 school days. To request access please contact your academy's Data Protection Representative.

Other rights

As a data subject, you have the right to:

- Formally object to the use of your data if it is likely to cause or result in damage, upset or distress
- In certain circumstances have inaccurate data corrected, removed or restrictions placed on its processing
- Claim compensation for damages caused by a breach of the data protection regulations
- Object to the use of your data in decisions being made by automated processes
- Prohibit your data being used to send direct marketing

To exercise any of these rights, please contact your academy's Data Protection Representative (DPR).

Complaints process

To make a complaint or discuss a situation where you believe your data may be being misused, please contact the school in the first instance requesting to speak to the Data Protection Officer.

The Information Commissioner's Office (ICO) can also receive complaints around data handling:

- Via their web form at: <https://ico.org.uk/make-a-complaint/>
- Via live chat on the ICO website
- By calling: 0303 123 1113
- In writing 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 in the first instance contact your academy's Data Protection Representative (DPR).

If you feel your concern has not been answered or you have an issue that needs to be escalated please contact our Data Protection Officer (DPO).

Academy Data Protection Representatives:

Central Office*

Emma Gooding*

Dpr@andaras.org*

Data Protection Officer:

Glyn Pascoe dpo@ict4.co.uk