

drb Ignite Multi Academy Trust

PRIVACY NOTICE FOR STAFF

Introduction

Under data protection law, individuals have a right to be informed about how the Trust uses any personal data that it holds about them. The Trust complies with this right by providing *privacy notices*, sometimes called *fair processing notices* to individuals where the Trust is processing their personal data.

This Privacy Notice explains how the Trust collects, stores and uses personal data about individuals it employs, or otherwise engages, to work at Trust schools.

drb Ignite Multi Academy Trust is the *data controller* for the purposes of data protection law.

The Trust's data protection officer is Alvin Walters.

The personal data the Trust holds

The Trust processes data relating to those it employs to work at Trust schools. Personal data that the Trust may collect, use, store and share (when appropriate) about individuals 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
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence

- Photographs
- CCTV footage
- Data about an individual's use of the school's information and communications system

The Trust may also collect, store and use information about individuals 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 and teacher professional association membership
- Health, including any medical conditions, and sickness records

Why the Trust uses this data

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

- enable staff to be paid
- facilitate safe recruitment, as part of the Trust's safeguarding obligations towards pupils
- support effective performance management
- inform 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

The Trust's lawful basis for using this data

The Trust only collects and uses personal information when the law allows it to. Most commonly, the Trust uses it where it needs to:

- fulfil a contract it has entered into with an individual
- comply with a legal obligation

- carry out a task in the public interest

Lawful Basis in the event of a Pandemic (i.e., Covid-19)

Your contact details would be shared with Government or health agencies such as NHS Test and Trace in the **interest of Public Health**. On this basis it would not be necessary to seek the consent of the individuals to then process the data and share it for the purposes of Test and Trace should this become necessary.

Less commonly, the Trust may also use personal information where:

- an individual has given consent to use it in a certain way
- the Trust needs to protect an individual's vital interests (or someone else's interests)
- the Trust has legitimate interests in processing the data

Where individuals have provided the Trust with consent to use data, they may withdraw this consent at any time. The Trust will make this clear when requesting consent and explain how to go about withdrawing consent if individuals wish to do so.

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

Collecting this information

While the majority of information the Trust collects from individuals is mandatory, there is some information that individuals can choose whether or not to provide.

Whenever the Trust seeks to collect information, it makes it clear whether individuals must provide this information and if so, what the possible consequences are of not complying or whether individuals have a choice.

How the Trust stores this data

The Trust keeps personal information in full compliance with GDPR requirements.

Data sharing

The Trust does not share information about individuals with any third party without consent unless the law and its policies allow it to do so.

Where it is legally required, or necessary and it complies with data protection law, the Trust may share personal information about individuals with:

- the local authority – to meet the Trust’s legal obligations to share certain information such as safeguarding concerns
- the Department for Education (DfE) and Education and Skills Funding Agency (ESFA)
- an individual’s family or representatives
- education and testing agencies
- Ofsted
- suppliers and service providers – to enable them to provide the service the Trust has contracted them for, such as payroll
- financial organisations
- central and local government
- the Trust’s auditors
- survey and research organisations
- trade unions and teacher professional 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
- NHS Test & trace or other such Government agencies

Transferring data internationally

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

Individual rights

How to access personal information the Trust holds about an individual

Individuals have a right to make a **subject access request** to gain access to personal information that the Trust holds about them.

If an individual makes a subject access request, and the Trust does hold information about them, it will:

- provide a description of it
- tell the individual why it is holding and processing the data including how long it will be kept for
- explain where the Trust got the information from, if not from the individual
- tell the individual who it has been, or will be, shared with
- let the individual know whether any automated decision-making is being applied to the data and any consequences of this
- give the individual a copy of the information in an intelligible form

Individuals may also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If an individual would like to make a request, the Trust's data protection officer should be contacted.

Rights regarding data

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

- object to the use of personal data if it would cause, or is causing, damage or distress
- prevent personal data being used for direct marketing
- object to the use of personal data for decisions being taken by automated means i.e. 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, the Trust's data protection officer should be contacted.

Complaints

The Trust takes any complaints about data collection and use of personal information very seriously.

If an individual believes that the Trust's collection or use of personal information is unfair, misleading or inappropriate, or has any other concern about the Trust's data processing, this should be raised with the Trust's DPO in the first instance.

To make a complaint, the Trust's data protection officer can be contacted at:

- Alvin Walters (dpo@drbignitemat.org)
- Address: 3 Brindleyplace, Birmingham B1 2JB

Alternatively, an individual 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

Document Control

The Trust's Data Protection Officer is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all/specified members of staff on the Trust website and is published on 18th August 2020.

This procedure was approved by the Chief Executive Officer (CEO) issued on a version-controlled basis under his signature.

Name	Signature	Date
Robert Bowater		18/8/20

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Richard Martin	3/5/2018
2	Review	Robert Bowater	25/2/19
3	Review	Robert Bowater	18/8/20