

## PRIVACY NOTICE FOR STAFF



*inspire transform together*

Summary	
Policy Reference Number:	n/a
Category:	Data Protection
Authorised By:	Board Of Directors
Committee Responsible:	Board Of Directors
Version:	2018-1
Status:	21/03/2018: Approved at Full Trust Board.
Next Review Date:	21/03/2019

*The Heath Academy Trust*  
*Registered Address: S.t Ives Primary & Nursery School, Sandy Lane, St. Ives, Ringwood, Hampshire, BH24 2LE*  
*Registered in England and Wales*  
*Registration Number: 09809895*

## Contents

No.	Content	Page No.
1.	Privacy Notice (how we use school workforce information)	Page 4
2.	Why We Collect And Use This Information	Page 4
3.	The Lawful Basis On Which We Process This Information	Page 4
4.	Collecting This Information	Page 4
5.	Storing This Information	Page 4
6.	Who We Share This Information With	Page 4
7.	Why We Share School Workforce Information	Page 4
8.	Department for Education (DfE)	Page 5
9	Data Collection Requirements	Page 5
1.0.	Requesting Access To Your Personal Data	Page 5
11.	Further Information	Page 6

## Definitions

*Note: These terms are standard throughout all policy documents and are designed to provide clarity.*

### Section 1: The MAT

“the Academy Trust” and “Trust”	mean the Heath Academy Trust Company.
“the Board”	means the Board of Directors of the Heath Academy Trust Company.
“the Directors”	refers to the group of (up to 12) Directors who make up the Board, and who are also the Heath Academy Trust’s “Trustees” under charity law.
“Finance Committee”	refers to the Finance and Audit Committee formed by the Board to manage the financial affairs of the Trust.
“Accounting Officer”	is a role held by the Chief Executive Officer (“CEO”) of the Trust, and one which includes a personal responsibility for the financial resources under the Trust’s control. He is accountable for the Trust’s financial affairs.
“Chief Finance Officer” (CFO)	is the Trust’s finance director, and also the Trust Business Manager, to whom the Accounting Officer delegates responsibility for delivery of the Trust’s financial processes and reports , and for the oversight and consolidation of the Academies’ financial data.
“Trust Business Manager” (“TBM”)	Fulfils the CFO role within the Trust, including compliance and statutory returns, as described in the Academies’ Financial Handbook.
“Leadership Team”	is a team representing the Academies, consisting of the Headteachers and the CEO, and the TBM.

*A full description of the positions listed and their responsibilities will be found in the current Academies’ Financial Handbook.*

### Section 2: The Schools

“Academy”	One of the six schools making up the Heath Academy Trust.
“Academies”	All of the six Academies.
“School”	means an Academy within the Trust.
“Finance Officer”	The person responsible for the day to day management of an Academy’s financial operations.
“Governor”	means a formally elected and appointed member of a School’s Governing Body (generally referred to as the LGB).
“Headteacher”	means the senior person at an Academy who may also be an Executive Headteacher and/or elected as a Director of the Board.
“School’s Leadership Team”	A group within each School consisting of the Headteacher, senior staff and the local Governing Body.

## **PRIVACY NOTICE FOR STAFF**

### **1. Privacy Notice (how we use school workforce information)**

- 1.1 The categories of school workforce information that we collect, process, hold and share include:
- personal information (such as name, employee or teacher number, national insurance number)
  - special categories of data including characteristics information such as gender, age, ethnic group
  - contract information (such as start dates, hours worked, post, roles and salary information)
  - work absence information (such as number of absences and reasons)
  - qualifications (and, where relevant, subjects taught)

### **2. Why We Collect And Use This Information**

- 2.1 We share information to comply with statutory, regulatory and contractual obligations. These may include, but are not limited to:
- improving the management of workforce data across the sector
  - enabling development of a comprehensive picture of the workforce and how it is deployed
  - pay salaries and pension contributions
  - informing the development of recruitment and retention policies
  - allowing better financial modelling and planning
  - enabling ethnicity and disability monitoring
  - supporting the work of the School Teachers' Review Body
  - comply with guidance such as 'Working Together' and safeguarding obligations

- 2.2 If we are required to comply with other legal obligations not listed above, we will share data only when it is lawful to do so.

### **3. The Lawful Basis On Which We Process This Information**

- 3.1 We make sure that information we collect and use about our workforce is in line with the GDPR and Data Protection Act. This means that we must have a lawful reason to collect the data, and that if we share that with another organisation or individual we must have a legal basis to do so.

- 3.2 The lawful basis for schools to collect and process information comes from a variety of sources, such as Article 6 and Article 9 of the GDPR and the Safeguarding of Vulnerable Groups Act 2006. We also have obligations to organisations such as HMRC and the Department of Work and Pensions.

### **4. Collecting This Information**

- 4.1 Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

### **5. Storing This Information**

- 5.1 We hold school workforce data for:
- St. Ives Primary & Nursery School
  - Three Legged Cross First & Nursery School
  - Oakhurst Community First & Nursery School
  - St. Mary's CE First & Nursery School
  - Sixpenny Handley First School
  - St. James' CE First School

### **6. Who We Share This Information With**

- 6.1 We routinely share this information with:
- the Department for Education (DfE)

### **7. Why We Share School Workforce Information**

- 7.1 We do not share information about workforce members with anyone without consent unless the law and our policies allow us to do so.

## **8. Department for Education (DfE)**

- 8.1 We 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 educational attainment.
- 8.2 We are required to share information about our pupils with the (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

## **9. Data Collection Requirements**

- 9.1 The DfE collects and processes personal data relating to those employed by schools (including MultiAcademy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005.
- 9.2 To find out more about the data collection requirements placed on us by the DfE including the data that we share with them, go to:  
<https://www.gov.uk/education/data-collection-and-censuses-for-schools>
- 9.3 The DfE may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:
- conducting research or analysis
  - producing statistics
  - providing information, advice or guidance
- 9.4 The Trust and Trust schools have robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:
- who is requesting the data
  - the purpose for which it is required
  - the level and sensitivity of data requested; and
  - the arrangements in place to securely store and handle the data
- 9.5 To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.
- 9.6 For more information about the DfE data sharing process, please visit:  
<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>
- 9.7 To contact the DfE:  
<https://www.gov.uk/contact-dfe>

## **10. Requesting Access To Your Personal Data**

- 10.1 Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact your School Data Protection Controller.
- 10.2 You also have the right to:
- object to processing of personal data that is likely to cause, or is causing, damage or distress
  - 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 regulations

10.3 If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at:

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

## **11. Further Information**

11.1 If you would like to discuss anything in this privacy notice, please contact:

- Your data protection officer/data protection controller
- The Trust data protection officers