

**General Data Protection Regulations  
Employee Privacy Notice  
Inspire Education Trust**

**1. Who processes your information?**

The MAT is the data controller of the personal information you provide to us. This means the MAT determines the purposes for which, and the manner in which, any personal data relating to employees is to be processed. Inspire Education Trust, c/o Hearsall Academy, Kingston Road, Earlsdon, Coventry CV5 6LR.

In some cases, your data will be outsourced to a third-party processor if there is a legal or contractual obligation for us to share your data. There may be occasions when we gain your explicit consent to share your personal data with a contracted processor. Where the school outsources data to a third-party processor, the same data protection standards that the MAT upholds are imposed on the processor.

Jessica Sweet acts as a representative in the form of Data Protection Officer for the MAT with regard to its data controller responsibilities; they can be contacted on 02476831068 or [Jessica.Sweet@coventry.gov.uk](mailto:Jessica.Sweet@coventry.gov.uk). Their role is to oversee and monitor the MAT's data protection procedures and policies and to ensure they are compliant with the General Data Protection Regulation.

The MAT's registration as a data controller is ZA186834.

**2. Why do we collect and use your information?**

The MAT holds the legal right to collect and use personal data relating to employees<sup>1</sup> and we may also receive information regarding them from their previous school, Local Authority and/or the Department of Education. We collect and use personal data in order to meet legal requirements and public interest set out in the GDPR and applicable domestic law, including those in relation to the following:

- The Data Protection Act 2018
- Article 6 and Article 9 of the General Data Protection Regulations
- Education Act 1996
- The MAT will also store personnel records for employees in order to comply with the UK's Employment legislation.
- Equality Act 2010
- Part 4 of the Schedule to the Education 2014

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<sup>1</sup> 'Employee' will include volunteers, agents and workers of the school who are given the responsibility of working with personal data.

- Academy requirements set out in the funding agreement.
- Academies may also collect information from the Teacher Services system.
- Regulations 3 and paragraphs 4, 5 and 6 of Part 1 and paragraphs 15, 16 and 17 of the Schedule to the Non-Maintained Special Schools (England) Regulations 2015

We use employee data in order to:

- enable the development of a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- to carry out contractual obligations
- share data with HMRC and relevant pension providers of financial information
- To provide appropriate pastoral care
- To assess the quality of our service
- To comply with the law regarding data sharing
- To safeguard pupils
- To comply with specific employment law requirements, including our obligations as an employer under employment protection and health and safety legislation, and under statutory codes of practice such as those issued by ACAS
- To make payments to our workforce, such as salary payments
- To deduct tax and National Insurance contributions
- To make a decision about recruitment
- To check individuals are legally entitled to work in the UK
- Administering employment contracts
- Conducting performance and/or attendance reviews
- Making decisions about salary and compensation
- Liaising with pension providers
- Providing employment benefits, including childcare vouchers, cycle to work scheme, etc.
- To administer and pay trade union premiums and register the status of a protected employee
- To ensure safe working practices
- In the interests of ensuring equal opportunities and treatment
- To comply with JCQ regulations for exam centres
- To conduct research or analysis and/or provide statistical reports
- Where we otherwise have the consent of the individual

Whilst the majority of processing of personal data of our workforce will not require consent, we will inform individuals if their consent is required and seek that consent before any processing takes place. In the limited circumstances where individuals have provided their consent to the

collection, processing and transfer of personal information for a specific purpose, they have the right to withdraw their consent for that specific processing at any time. To withdraw their consent, they should contact the office manager or designated data protection person within their school.

### **3. Which data is collected?**

The categories of employee information that the MAT collects, holds and shares include the following:

- personal information (such as name, address, home and mobile numbers, personal email address, employee or teacher number, national insurance number, and emergency contact details)
- special categories of data including such as gender, age, ethnic group, sex or sexual orientation, religious or similar beliefs, political opinions, trade union membership, information about health, genetic information and biometric data. These types of personal data are subject to additional requirements.
- contract information (such as start dates, hours worked, post, roles, salary information, bank or building society details)
- photographs for identification purposes. These are shared with new pupils to aid the transition into school
- work/sickness absence information (such as number of absences and reasons, including information regarding physical and/or mental health, and holiday records)
- Qualifications / training courses attended, and, where relevant, subjects taught

Whilst the majority of the personal data you provide to the MAT is a necessary for the fulfilling a contractual obligation, a legal requirement or public task requirement, some person information is provided on a voluntary basis. When collecting data, the MAT will inform you whether you are required to provide this data or if your consent is needed. Where consent is required, the MAT 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.

#### **4. Who can access this data?**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. The electronic data that we collect from you will be processed by software providers, and providers of services to the MAT such as payroll.

The categories of people within the school who can access this data will depend on which data they are authorised to access. Members of MAT staff are limited to only the information they require to perform their duties. Access to electronic data will be password protected and hard copy files processing personal data will be securely stored for authorised use.

Third party contractual agreements mean that some information will be received and processed by the organisations listed in section 6 of this notice.

#### **5. How long is your data stored for?**

In accordance with the General Data Protection Regulations, the MAT does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected.

Personal data relating to employees at the MAT is stored in line with the MAT's [Data Protection Policy and record retention and archiving procedures](#).

#### **6. Will my information be shared?**

The MAT routinely shares employees' information under legal obligation and contractual obligation with:

##### **•Local authority**

We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

##### **•Department for Education (DfE)**

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. We are required to share information about our schools' employees with our local authority (LA) and the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

- Occupational health services
- Her Majesty's Revenue and Customs
- Contractors, such as payroll providers, to enable them to provide an effective service to the school and government agencies such as HMRC and DWP regarding tax payments and benefits
- Our professional advisors including legal and HR consultants
- Pension services Teachers Pensions / West Midlands Pension Fund
- Disclosure and Barring Service
- Department of Work and Pensions

- Court Services
- National Fraud Initiative
- Trade Unions
- Software providers such as Capita
- The Trust uses Microsoft Office 365 applications, including Teams, to collaborate and communicate with staff, pupils and parents. Any use of services within the Trust are subject to security controls and staff training.
- Inspire Education Trust share personal data with The Headteachers Report Limited for the purpose of receiving aggregated management information reports
- We may need to share your data with an official authority such as the police for the prevention and detection of crime.
- Other schools to which a child transfers after leaving a MAT school; i.e. we may transfer safeguarding records to that school for child protection reasons. Those safeguarding records may include information about the MAT staff member involvement in supporting that child.
- JCQ and awarding bodies, for the purpose of complying with JCQ regulations and running exams.

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, ensuring there are adequate safeguards in place. The transfer mechanisms include standard contractual clauses.

## **7. Keeping your information safe**

It is very important that only people who need to use your information can see it. The MAT keeps your information safe by:

- Training and supporting our staff to work with data safely.
- Carefully selecting and managing the IT systems we use.
- Carefully choosing suppliers of services to the MAT.
- Appointing a Data Protection Officer
- Performing data protection impact assessments where appropriate
- Only disclosing information to others where it is lawful and necessary.
- Securely disposing of old IT devices and paper records.

## **8. What are your rights?**

Employees have the following rights in relation to the processing of their personal data. You have the right to:

- Be informed about how the MAT uses your personal data.
- Request access to the personal data that the MAT holds on you.
- Request that your personal data is amended if it is inaccurate or incomplete. If you believe that any information we are holding is incorrect or incomplete, please contact us and we will promptly

correct your personal information found to be incorrect.

- Request that your personal data is erased where there is no compelling reason for its continued processing.
- Request that the processing of your data is restricted.
- Request that your personal data is transferred to another controller in an electronic format.
- Where your data is processed by automated means, you have the right to request that this is completed with human intervention.
- Object to your personal data being processed.
- Where the processing of your data is based on your consent, you have the right to withdraw this consent at any time.

### **Information Commissioner's Office (ICO)**

If an individual has any concerns about how we are using their personal data then we ask that they contact our Data Protection Officer whose details are above, in the first instance. However, an individual can contact the Information Commissioner's Office should they consider this to be necessary, at <https://ico.org.uk/concerns>

### **9. What data is collected on this site?**

The MAT is committed to providing you with the best online experience while visiting our website(s).

Please refer to the information provided on our website(s) for specific details about how they store and process cookies. Cookies are not computer programs and cannot contain viruses. For more information on how they work please follow this link: <https://www.cookie-law.org/the-cookie-law/>

### **10. Where can you find out more information?**

If you would like to find out more information about how we use and store your personal data please visit our website and download our Data Protection Policy. Please also see websites listed below:

#### **Department of Education**

<https://www.gov.uk/education>

#### **Cookies**

<http://www.aboutcookies.org/>

#### **ICO**

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

### **11. Changes to our privacy policy**

We keep our privacy policy under review and we will place any updates on this webpage.

This privacy notice was last updated in December 2020.

### **Appendix**

*Hearsall Community Academy uses CCTV for the following purposes:*

- *To provide a safe and secure environment for pupils, staff and visitors.*
- *Footage may be used as evidence during internal disciplinary proceedings, grievance procedures or complaints where related to the provision of such a safe and secure environment, subject to the usual confidentiality requirements of those procedures.*
- *To prevent the loss of or damage to Hearsall Community Academy's buildings and/or assets*
- *To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders*

*For further information about our use of CCTV, please refer to our CCTV Policy <https://www.ietrust.org/wp-content/uploads/2019/05/H-GDPR-CCTV-Policy-v.5-1.pdf>*