

UK General Data Protection Regulations Employee Privacy Notice

Inspire Education Trust

1. Who processes your information?

Inspire Education Trust (“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.

Warwickshire County Council DPO Service 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 via schoolDPO@warwickshire.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 ZA764316.

2. Why do we collect and use your information?

The MAT holds the legal right to collect and use personal data relating to employees¹ 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 UK GDPR and applicable domestic law, including those in relation to the following:

- The Data Protection Act 2018
- Article 6 and Article 9 of the UK 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

¹ ‘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
- To establish good governance of each school and Trust
- To communicate relevant information to Local Governing Bodies

- 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.

For further details on our lawful basis for collecting and sharing data, please see Annex 2.

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

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 UK 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: <https://www.ietrust.org/gdpr/>

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, financial 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
- Reception sign in systems
- Software providers such as Capita
- Vivup, who provide benefit services to staff.
- 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; e.g. we will 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 the Trust engages an individual as an apprentice, data shared is with LMP Education for the purpose of providing apprenticeship training.
- Carefully selected providers assist us with the operation and management of our ICT systems and services.
- Data integration services link our MIS data to various systems and platforms to enable them to function.
- We use video conferencing platforms to communicate with staff, parents, students, and other organisations, including the delivery of parents evenings.
- Some staff data is shared with online learning platforms, in order for appropriate staff to use these systems. Primary schools in Inspire Education Trust use “Class Dojo” which transfers data to the US, protected by standard contractual clauses.
- Our Primary schools share data with the Standards & Testing Agency who administer various tests, as required by the Department for Education.

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 and International Data Transfer Agreements.

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. CCTV

Inspire Education Trust 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 Inspire Education Trust buildings and/or assets
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders
- To provide evidence in case of disputes with contractors & other third parties.

For further information about our use of CCTV, please refer to our CCTV Policy, available at: <https://www.ietrust.org/policies-procedures/>

10. What data is collected on the Trust websites?

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/>

11. 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/>

12. 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 February 2025

Appendix 1 – School specific processing

Blue Coat Church of England School

Blue Coat Church Of England School may use Microsoft Teams to help us deliver online lessons where some or all pupils are at home. We will explain at the start of the lesson what our expectations are regarding pupil behaviour, including having pupils at home turn off their cameras and microphones at the start of the lesson, and when to un-mute the microphone. The teacher will position the camera inside the classroom so that it points towards the teacher, and away from pupils.

On some occasions, the teacher may wish to record the lesson for the purposes of allowing children who missed the lesson to catch up, or for the class to be able to refer to the lesson for revision purposes. In which case, Microsoft Teams will notify the user that the session will be recorded. If a student does not wish to participate in the recorded session, the lesson can be watched at a later date. The teacher will ensure that footage of any such recorded lesson is only shared with children in that class, it will be stored securely and with limited access and they will only retain the footage for as long as necessary, which will be no longer than the end of the current academic year.

We use educational systems for the purpose of supporting students whose first language is not English, and to support students with a low level of literacy.

We use third party systems to help us manage our careers provision to pupils, for staff recruitment

purposes, and for communication with staff, students and parents.

Our library provision is supplemented by online systems, allowing access to electronic reading materials and promoting literacy.

We use third party systems and portals to exchange data with exam boards, such as exam entries, withdrawals, results etc.

We share data with third party organisations when they provide work related learning and alternate provision for our students.

We share data with Coventry LA when we source Work Related Learning provision through the LA programme. Further information can be found here via the following link: https://www.coventry.gov.uk/info/150/work_related_learning/3207/work_related_learning_privacy_notice/2

Our Christmas and other music videos will include performances from participating children and staff, where there is consent for the school to do so. The videos will be published for public access on YouTube and on the school website, for up to two years.

We participate in teacher training with other training providers. Where trainee teacher observations cannot be performed on site due to social distancing measures, teacher observations may take place remotely via a live, private video stream. The camera is pointed away from children. No recording takes place.

We share data with Coventry and Central Warwickshire Teaching School Hub, who subsequently share data with the DFE, University College London and the Gateway Alliance. This applies to staff participating in the CCWTSH activity only, which will be Early Careers Teachers and Staff Mentors.

Blue Coat School sometimes creates videos of teachers in classrooms for the purposes of developing teacher pedagogy and improve teaching and learning. Videos are focused on staff members but pupils may appear in videos on screen on through sound. These videos are only available internally within Inspire Education Trust.

We share some parent data with Sparx Learning to improve student engagement with tasks and provide feedback on student work.

The school may use generative AI including ChatGPT for the purpose of improving pedagogy and pupil education. Pupil personal data is not entered into the system.

Clifford Bridge Academy

Our library provision is supplemented by online systems, allowing access to electronic reading materials and promoting literacy.

We use a variety of online learning platforms in order to support and enhance lessons, homework, and learning.

Our videos, including the school band, will include participating children where there is consent for the school to do so. The videos may be published for public access on the school website, school Facebook page, YouTube and Twitter.

We use the “SayHi” voice and text recognition app for the purpose of translation for students who speak little English. This app records and translates conversations while active which could include individuals in the vicinity of the app user.

Clifford Bridge sometimes creates videos of teachers in classrooms for the purposes of developing teacher pedagogy and improve teaching and learning. Videos are focused on staff members but pupils may appear in videos on screen on through sound. These videos are only available internally within Inspire Education Trust.

Hearsall Community Academy

Our library provision is supplemented by online systems, allowing access to electronic reading materials and promoting literacy.

Stockingford Academy

Stockingford Academy may use Microsoft Teams to help us deliver online lessons where some or all pupils are at home. We will explain at the start of the lesson what our expectations are regarding pupil behaviour, including having pupils at home turn off their cameras and microphones at the start of the lesson, and when to un-mute the microphone. The teacher will position the camera inside the classroom so that it points towards the teacher, and away from pupils.

On some occasions, the teacher may wish to record the lesson for the purposes of allowing children who missed the lesson to catch up, or for the class to be able to refer to the lesson for revision purposes. In which case, Microsoft Teams will notify the user that the session will be recorded. If a student does not wish to participate in the recorded session, the lesson can be watched at a later date. The teacher will ensure that footage of any such recorded lesson is only shared with children in that class, it will be stored securely and with limited access and they will only retain the footage for as long as necessary, which will be no longer than the end of the current academic year.

We use video conferencing platforms to communicate with staff, parents, students, and other organisations, including the delivery of parents evenings.

Some of our videos will include participating children and staff, where there is consent for the school to do so. The videos may be published for public access on the school website, for up to two years.

Walsgrave Church of England Academy

Our library provision is supplemented by online systems, allowing access to electronic reading materials and promoting literacy.

Whittle Academy

We use educational systems for the purpose of supporting students whose first language is not English, and to support students with a low level of literacy.

Our library provision is supplemented by online systems, allowing access to electronic reading materials and promoting literacy.

We participate in teacher training with other training providers.

Appendix 2 – Lawful Basis for processing data

Table 1 – Personal information we are required to process to comply with the law:

Information Type	Relevant legislation	Special Category–additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Staff information, including personal details, N.I number, DBS checks, qualifications, verification of right to work in the U.K	Education Act 2005, Section 114 and accompanying regulations		Secretary of State, Local Authority, Disclosure & Barring Service	Legal Obligation
School workforce Census including staff personal details	Education Act 2005, Section 114 and accompanying regulations		Department of Education	Legal Obligation
School workforce Census – Staff Ethnicity	Education Act 2005, Section 114 and accompanying regulations	Necessary for reasons of substantial public interest.	Department of Education	Legal Obligation
Accident Records	Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 (RIDDOR)		Health & Safety Executive, and Local Authority Health & Safety team (where necessary)	Legal Obligation
Individual Staff Health & Safety Risk Assessments and Personal Emergency Evacuation Plans (PEEP)	Health and Safety at Work etc Act 1974 and accompanying legislation		Not shared externally	
Qualifying Complaint Information	Education Act 2005, Section 11B		Chief Inspector	Legal Obligation
Verification of Right to work in the U.K (Single Central Record)	Immigration, Asylum and Nationality Act 2006, Section 15		Local Authority, Ofsted	Legal Obligation

Table 2 – Personal information we are required to process as it is necessary to protect someone’s vital interests

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Medical Information	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent OR Necessary for preventative/ occupational medicine	Medical staff i.e. paramedics/ambulance Responsible/First aid trained staff on residential trips	Vital Interest
Staff Dietary Requirements (food allergies)	Necessary for preventative/ occupational medicine	Medical staff i.e. paramedics/ambulance	Vital Interest
Medical Conditions & Staff Emergency Contact Details	Necessary for preventative/ occupational medicine	Medical staff i.e. paramedics/ambulance Responsible/First aid trained staff on residential trips	Vital Interest
Religious belief	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent	Medical staff i.e. paramedics/ambulance	Vital Interest
Basic details (Governors)	Companies Act 2006 & Academies Act 2010		Companies House DfE

Table 3 - Personal information we are required to process with the consent of the individual to whom that information ‘belongs’ - *Please note, you have the right to withdraw your consent for us to process your data in this way at any time.*

Information Type	Special Category – additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Photographs		Local Press/Media, Staff Medical Noticeboard, Parents & Community (Newsletter, School Website, social media platforms, Annual Prospectus, Internal school displays, staff photo board).	Consent
Basic personal details e.g. name		Production of school leavers material, sharing name with media where it celebrates achievement and/or promotes the school	Consent

Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task. *You have the right to object or restrict processing that is carried out for the purposes of Public Task – However, please note that this is not an absolute right and*

would only apply in certain circumstances.

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Attendance Records at staff meetings and staff training		Not shared externally	Public Task
Staff personal characteristics i.e Religion/Gender/Ethnicity	Necessary for reasons of substantial public interest	Local Authority – Confidential Recruitment Monitoring, Diocesan Education Service annual census	Public Task & Statistical Purposes
Medical Conditions (including allergies)	Necessary for preventive or occupational medicine.	Medical staff i.e. paramedics/ambulance,	Vital Interests
Information relating to Trade Union Membership where there is industrial action that may impact the function of the school including class and/or school closures.	Article 9 (2) (b) <i>Employment and social security and social protection law</i>	Parents, Governors and other members of staff	Public Task
Images captured on our CCTV system		This is not shared routinely. Rarely images may be shared with consent, or to authorities e.g. Police.	Legal Obligation, Consent
Examination data including details of moderation, maladministration and training provided (where appropriate)	Substantial public interest	JCQ & exam boards	Public Task
Details required to use systems such as eLearning platforms, benefits packages, finance systems etc. e.g. name and email address		Each individual system that requires data to create and maintain accounts	Public Task
Record of Business Interest		Public record	Public Task (to comply with statutory guidance)

Name (Governors)		Public Record	Public Task (to comply with statutory guidance)
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Table 5 - Personal information we are required to process because of a contract we have with you or because you have asked us to take specific steps before entering into a contract

Information Type	Third Parties with whom we share the information	Lawful reason for sharing
Recruitment Information – Application forms, interview notes, Medical questionnaires & references	Local Authority & Ofsted	Public Task / Legal Obligation
Absence Records (including number of absences, reasons for absence & self-certifications forms)	Local Authority – HR & Payroll Team	Public Task
Disciplinary action taken	Local Authority – HR advisory team where relevant	Public Task
Grievances	Local Authority – HR advisory team where relevant	Public Task
Staff Information i.e name D.O.B, address, contact details, Emergency contact details	Department of Education – school workforce census.	Legal Obligation
P45 Forms	Local Authority – HR & Payroll team	Public Task
Consent Forms i.e UK GDPR, Policy Agreement	Not shared externally	
Staff personal bank details	Local Authority requirement for Payroll System	Contract
Appraisal Records, appraisal notes, feedback from colleagues, objectives, updated job descriptions, pay & promotion recommendations	Not shared externally	
Staff information, including personal details, N.I number, DBS, Address, Phone number.	Secretary of State, Local Authority, Disclosure & Barring Service,	Legal Obligation