



Inspiring Primaries Academy Trust
Inspiring pupils to achieve for their tomorrows

CHURCH LANE – GILMORTON – LUTTERWORTH – LEICESTERSHIRE - LE17 5LU – TELEPHONE: 01455 552 343

Privacy Notice for Staff – How we use your information 2020/2021

Who are we?

Inspiring Primaries Academy Trust is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Inspiring Primaries Academy Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: ZA291758.

You can contact the Academy Trust as the Data Controller in writing at:
Inspiring Primaries Academy Trust, Church Lane, Gilmorton, Lutterworth, Leicestershire, LE17 5LU or enquiries@inspiringprimaries.uk.

What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our pupils and parents.

What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information relates to personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

RESPECT - PERSEVERANCE - COMMUNITY

Our vision is to develop flourishing, lifelong learners in partnership with the communities we serve.

Inspiring Primaries Academy Trust: a company limited by guarantee, registered in England and Wales, number 08540699.

An exempt charity. Registered Office: Church Lane, Gilmorton, Leicestershire

What personal information do we process about staff?

Personal data that we may collect, use, store and share (when appropriate) about staff includes, but is not restricted to:

- 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 your use of the Trust/school's information and communications systems

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

Why do we use personal information?

The purpose of processing this data is to help us run the school, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Support effective performance management
- Inform our 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

What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. The lawful reasons we have for processing personal information are as follows:

1) To comply with the law

We collect and use general purpose staff information in order to meet certain legal requirements and legal obligations placed upon the Academy Trust by law. We therefore are required to process this personal information for such purposes even if you have not consented to us doing so.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

If you would like a copy of or further information regarding the statutory authorities that underpin our legal obligations, you should contact the Academy Trust in writing.

2) To protect someone's vital interests

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information with are set out in Table 2.

3) With the consent of the individual to whom that information 'belongs'

Whilst much of the personal information processed is in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information with are set out in Table 3.

4) To perform a public task

It is a day-to-day function of the Academy Trust to ensure that staff receive the support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that staff are properly supported.

Details of the type of processing that we may undertake on this basis and who we may share that information with are set out in Table 4.

5) We have a legitimate interest

Occasionally we have reasons to process information which fall outside of our usual day-to-day school functions. Details of the type of processing that we may undertake on this basis are set out in Table 5.

Please be aware that an individual has the right to object to any processing where it is likely to cause or is causing harm or distress. To exercise this right, individuals should do so by contacting the school/academy trust to inform them of their reasons for the objection. These reasons should relate to your specific circumstances. Upon receipt of an objection, the academy trust will consider the reasons for the objection and balance this against the legitimate grounds to process data.

Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

1. Explicit consent of the data subject
2. Processing relates to personal data which is manifestly made public by the data subject
3. Necessary for establishing, exercising or defending legal claims
4. Necessary for reasons of substantial public interest
5. Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
6. Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of special category personal information data that we process is set out in the tables attached.

Who might we share your information with?

We routinely share staff information with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- The Department for Education - to meet statutory data collections
- Your family or representatives - to enable contact as and when required
- Educators and examining bodies - to collate records and evidence for assessment and statistical purposes
- Our regulator Ofsted - to meet statutory inspections
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as HR and payroll
- Financial organisations – to enable the processing of payroll transfers
- Central and local government - to meet statutory data collections
- Our auditors - to enable them to verify financial
- Survey and research organisations - to provide evidence for statistical research
- Trade unions and associations – to inform of structural changes
- Health authorities - to provide information to support medical interventions and assessments
- Security organisations – to enable contact when required
- Professional advisers and consultants - to provide information to support assessments
- Police forces, courts, tribunals - to provide requested evidence
- Online platforms for planning, data storage and communication

We do not share information about our staff unless the law and our policies allow us to do so.

Please refer to the tables for information about what personal information is shared with which specific third parties.

Data collection requirements:

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

What do we do with your information?

All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected. The Academy Trust monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

NHS Test and Trace/Public Health Agencies:

It may be necessary for us to share limited information with the above agencies in the event that an individual tests positive for Coronavirus, or if there is a Coronavirus outbreak. This will enable the named agencies to liaise with families to provide advice and support, and to take appropriate steps in responding to an outbreak.

How long do we keep your information for?

In retaining personal information, the Academy Trust complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the Academy Trust is required to retain the information.

A copy of those schedules can be located using the following link:

<http://irms.org.uk/page/SchoolsToolkit>

Transferring data internationally:

Where we transfer personal data to a country or territory outside the UK, we will do so in accordance with data protection law.

What are your rights with respect of your personal information?

Under data protection law, staff have the right to request access to information about them that we hold. To make a request for your personal information, contact the school data protection contact or the School Data Protection Officer at Warwickshire Legal Services via email at schooldpo@warwickshire.gov.uk or alternatively;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

****Please ensure you specify which school your request relates to.**

Where the school/academy trust process data for the purposes of legitimate interests or to fulfil their public task, individuals have a right to object to the processing where it is likely to cause, or is causing, harm or distress. When exercising this right, individuals should contact the school/academy trust to inform them of their reasons for their objection. The school/academy trust will consider the reasons for any objection and assess the risk to the individual against the purposes for the processing. In the event the school/academy trust is unable to comply with an objection, we will ensure we can demonstrate compelling legitimate grounds to continue with the processing.

You also have the right to:

- 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

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office:

- 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

Review

The content of this Privacy Notice will be reviewed 1st July 2022.

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, Warwickshire County Council, 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	Consent	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.	<ul style="list-style-type: none"> Medical staff i.e. paramedics/ambulance 	Vital Interest
Medical Information and conditions	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent.	<ul style="list-style-type: none"> External third parties such as coaches and volunteers supporting curricular or extracurricular activities 	Vital Interest
Dietary / allergies	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent.	<ul style="list-style-type: none"> Medical staff i.e. paramedics/ambulance Catering Staff - Educaterers Residential Accommodation providers - e.g. PGL Location visited where food will be provided by third parties other schools and locations visited on school 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.	<ul style="list-style-type: none"> Medical staff i.e. paramedics/ambulance 	Vital Interest

Table 3 - Personal information we are required to process with the consent of the individual to whom that information 'belongs'

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Digital Photographs / videos		<ul style="list-style-type: none"> Media organisations to take photographs of staff engaged in school activities or events for publication School Newsletter School Prospectus School Website Facebook and Twitter Official school photographs, with images taken by an external Photographic company 	Consent
Staff Email address and mobile number		<ul style="list-style-type: none"> Parents, and other members of staff 	Public Task

Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task – please note that the right to object will apply to this processing, please see the section above that refers to ‘What are your rights with respect to your personal information?’

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		<ul style="list-style-type: none"> Not shared externally 	Public Task
Staff personal characteristics i.e Religion/Gender/Ethnicity	Consent	<ul style="list-style-type: none"> Local Authority – Confidential Recruitment Monitoring, Diocesan Education Service annual census 	Public Task & Statistical Purposes
Medical Conditions (including allergies)	Necessary for preventive or occupational medicine.	<ul style="list-style-type: none"> Medical staff i.e. paramedics/ambulance, 	Vital Interests

Table 5 - Personal information we process because we have a legitimate interest

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Images captured on a schools’ CCTV system	n/a	<ul style="list-style-type: none"> Police and legal system where a suspected crime has been committed 	Legal obligation