



GUILSBOROUGH ACADEMY TRUST

PRIVACY NOTICE FOR STAFF

Introduction

Under UK data protection law, individuals have a right to be informed about how Guilsborough Academy Trust uses personal data held about them. We comply with this right by providing privacy notices to individuals where we are processing their personal data. This privacy notice explains how we collect, store, use and share personal data about employees, workers, volunteers, governors, trustees and contractors engaged by or working with the Trust.

Data Controller

Guilsborough Academy Trust is the data controller for the purposes of UK data protection law, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The Trust's Data Protection Officer service is provided by GDPR Sentry Limited. Contact details are provided at the end of this notice.

The Personal Data We Hold

We process personal data relating to individuals employed by, working for, volunteering with, governing or providing services to Guilsborough Academy Trust. Personal data that we may collect, use, store and share, where appropriate, includes but is not limited to: contact details; date of birth; emergency contact details; recruitment and employment records; right to work documentation; references; qualifications, training records and professional memberships; payroll, tax and pension information; absence and leave records; performance management records; disciplinary, grievance and capability records; safeguarding, vetting and DBS information where applicable; occupational health information; photographs and identification information; CCTV images; access control records; IT, email, network and device usage information; and records relating to work carried out for the Trust.

Special Category Personal Data

We may also collect, store and use information that falls within the special categories of personal data under UK GDPR. This may include information relating to racial or ethnic origin; religious or philosophical beliefs; trade union membership; health information, including sickness absence, occupational health and reasonable adjustment information;



disability and access requirements; safeguarding information; and equality monitoring information. Where criminal offence data is processed, including information relating to criminal convictions, cautions, reprimands, warnings, barred list checks and Disclosure and Barring Service (DBS) checks, this will be done only where necessary, proportionate and authorised by law.

Criminal Convictions Data

As part of our safeguarding obligations and employment processes, we may process information relating to criminal convictions, cautions, reprimands, warnings, barred list checks and DBS checks where this is necessary and proportionate for the role or function being undertaken. Such processing is carried out in accordance with UK data protection legislation, the Data Protection Act 2018 and statutory safeguarding requirements, including Keeping Children Safe in Education.

Why We Use This Data

The purpose of processing this information is to support employment, workforce management and Trust operations by: administering employment, payroll, pensions and benefits; meeting contractual, statutory and regulatory obligations; facilitating safer recruitment, safeguarding and child protection responsibilities; supporting performance management, professional development, absence management and workforce planning; managing disciplinary, grievance, capability and wellbeing processes; enabling equality, diversity and inclusion monitoring; protecting pupils, staff, visitors and Trust property; maintaining secure and effective IT systems; and managing education, governance and operational services.

Our Lawful Basis for Using This Data

We will only collect and use personal information where we have a lawful basis to do so under Article 6 UK GDPR. The lawful bases we rely upon may include: Article 6(1)(b), where processing is necessary for the performance of an employment contract or to take steps before entering into one; Article 6(1)(c), where processing is necessary for compliance with a legal obligation; Article 6(1)(e), where processing is necessary for the performance of a task carried out in the public interest; Article 6(1)(d), where processing is necessary to protect vital interests; and, in limited circumstances, Article 6(1)(a), where valid consent is obtained. Where consent is relied upon, it may be withdrawn at any time. There may be more than one lawful basis that applies to a particular use of personal data.

Where we process special category personal data, we rely upon one or more conditions set out in Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018, including employment, social security and social protection obligations; occupational medicine and assessment of working capacity; equality of opportunity and treatment monitoring; safeguarding of children and vulnerable individuals; and substantial public interest



conditions where applicable. Where we process criminal offence data, this will be done in accordance with the Data Protection Act 2018 and any relevant safeguarding, employment or statutory requirements.

Collecting This Information

While much of the information we collect is required in order to administer employment, meet legal obligations and operate the Trust safely and effectively, some information may be optional. Where information is mandatory, we will make this clear and explain the consequences of not providing it.

How We Store This Data

Personal data is held securely in electronic and paper records and is stored in accordance with the Trust's Data Protection Policy and Records Retention, Destruction and Archive Policy. Staff records will be retained only for as long as necessary to meet employment, legal, regulatory, safeguarding, audit and operational requirements. Typical retention periods may include personnel files being retained for six years after employment ends, subject to any longer period required by law, safeguarding requirements or for the establishment, exercise or defense of legal claims.

Monitoring and Use of School Systems

The Trust may monitor CCTV, access control systems, network activity, email systems, device usage, internet use and cyber security systems where lawful, proportionate and necessary for safeguarding, security, operational management, compliance, investigating concerns, protecting Trust systems or meeting legal obligations. Monitoring will be carried out in accordance with applicable Trust policies and UK data protection legislation.

Data Sharing

We do not share information about staff with third parties without consent unless the law permits or requires us to do so. Where necessary and lawful, we may share personal information with: local authorities; the Department for Education; Ofsted; payroll, pension and HR providers; occupational health providers; safeguarding bodies; Disclosure and Barring Service (DBS); Teaching Regulation Agency (TRA); professional advisers and consultants; auditors; insurers; police; courts; regulators; government bodies; and suppliers and service providers supporting Trust functions. All data sharing is undertaken in accordance with UK data protection legislation.



International Transfers

Where personal data is transferred outside the United Kingdom, appropriate safeguards will be implemented in accordance with UK GDPR, including adequacy regulations, International Data Transfer Agreements or other approved transfer mechanisms.

Your Rights

Accessing Your Information

Individuals have the right to make a Subject Access Request (SAR) to obtain a copy of personal information held about them. If we hold information about you, we will explain what information is held, why it is being processed, how long it will be retained, where it was obtained from if not directly from you, who it has been or may be shared with, whether automated decision-making is involved, and provide a copy of the information in an intelligible format.

Other Data Protection Rights

Subject to certain limitations and exemptions, you have the right to be informed about how your personal data is used; access your personal data; have inaccurate personal data corrected; request erasure of personal data in certain circumstances; restrict processing in certain circumstances; object to processing carried out under public task grounds; request transfer of your personal data where applicable; and challenge decisions made solely by automated means. To exercise any of these rights, please contact the Trust's Data Protection Officer.

Complaints

We take concerns about the collection and use of personal information seriously. If you have a concern about how your personal information has been handled, please contact the Trust in the first instance so that we can investigate and respond appropriately. You may also contact the Trust's Data Protection Officer. If you remain dissatisfied, you have the right to complain to the Information Commissioner's Office (ICO). Information about raising a complaint can be found on the ICO website.

Contact Us

If you have any questions about this privacy notice or how the Trust processes personal data, please contact: Mr Niland, Assistant Principal, niland@guilsborough.northants.sch.uk.

Data Protection Officer: GDPR Sentry Limited, support@gdprsentry.com, 0113 804 2035, Unit 434 Birch Park, Thorp Arch Estate, Wetherby, West Yorkshire, LS23 7FG.

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