



# Data Protection Policy – Privacy Notice (Staff, Governors, Members, Trustees and Volunteers)

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Avonreach Academy Trust

<b>Approved By:</b>	<b>AAT Board of Trustees</b>
<b>Approved On:</b>	<b>8<sup>th</sup> May 2018</b>
<b>Next review date:</b>	<b>Summer Term 2019</b>

<b>Associated documentation</b>	
AAT Data Protection Policy	
General Data Protection Regulation	
Data Protection Bill	
Protection of Freedoms Act 2012	
ICO Code of Practice for Subject Access Requests	
ICO Code of Practice for the Use of Surveillance Cameras	
ICO Guidance on Personal Data Breaches	
Information on Records Management Society's Toolkit for Schools	
Acceptable Use Policy	
AAT Safeguarding Policy	

This document sets out the regulations for the MAT and member academies

## **Privacy notice for Staff, Governors, Members, Trustees and Volunteers**

Under data protection law, individuals have a right to be informed about how The Trust uses any Personal Data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their Personal Data.

This privacy notice explains how we collect, store and use Personal Data about individuals we employ, or otherwise engage, to work within our Trust.

We, Avonreach Academy Trust, are the 'Data Controller' for the purposes of data protection law.

The Trust's Chief Finance Officer (CFO) acts as our Data Protection Officer (DPO). Details regarding how to contact our DPO are contained in the "Contact Us" section of this Privacy Notice.

### **The Personal Data we hold**

We process data relating to those we employ, or otherwise engage, to work within our Trust. Personal Data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- 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, DBS reference Number, 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 or Passport or both
- Photographs
- CCTV footage
- Data about your use of the Trust's information and communications system

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 we use this data

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

## Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)
- We have legitimate interests in processing the data

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

## Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

## How we store this data

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment. Once your employment with us has ended, we will retain this file and delete the information in it in accordance with the Trust's Data Protection Policy.

We create and maintain a record for every Governor, Member and Trustee within the Trust. This information is kept secure and is only used for purposes directly related to Trust Governance.

Each school within the Trust creates and maintains a record for every volunteer who works within their school. This information is kept secure and is only used for the purposes for which it was provided.

For further details regarding Data Retention please see AAT's Data Protection Policy, which is available on the Avonreach website ([www.avonreach.org](http://www.avonreach.org)).

## **Data sharing**

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- *Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns*
- *The Department for Education*
- *Your family or representatives*
- *Educators and examining bodies*
- *Our regulator, Ofsted*
- *Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll*
- *Financial organisations*
- *Central and local government*
- *Our auditors*
- *Survey and research organisations*
- *Trade unions and associations*
- *Health authorities*
- *Security organisations*
- *Health and social welfare organisations*
- *Professional advisers and consultants*
- *Charities and voluntary organisations*
- *Police forces, courts, tribunals*
- *Professional bodies*
- *Employment and recruitment agencies*

## **Transferring data internationally**

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.

## **Your rights**

### **How to access personal information we hold about you**

Individuals have a right to make a '**Subject Access Request**' to gain access to personal information that the Trust holds about them.

If you make a Subject Access Request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you want to make a request please contact the Trust's Data Protection Officer (DPO), whose contact details can be found in the "Contact Us" section of this Privacy Notice.

### **Your other rights regarding your data**

Under data protection law, individuals have certain rights regarding how their Personal Data is used and kept safe. You have the right to:

- Object to the use of your Personal Data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your Personal Data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate Personal Data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact the Trust's Data Protection Officer (DPO), whose contact details can be found in the "Contact Us" section of this Privacy Notice.

### **Complaints**

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact the Trust's Data Protection Officer (DPO), whose contact details can be found in the "Contact Us" section of this Privacy Notice.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern 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

## Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact the Trust's **Data Protection Officer** using the contact details below:

Avonreach Academy Trust Data Protection Officer

Avonreach Academy Trust

Pershore High School

Station Road

Pershore

Worcestershire

WR10 2BX

Email: [dpo@avonreach.org](mailto:dpo@avonreach.org)

*This notice is based on the [Department for Education's model privacy notice](#) for pupils, amended for parents and to reflect the way we use data within Avonreach Academy Trust (AAT).*