



GMAT POLICIES

Staff Privacy

Greater Manchester Academies Trust

Revision Information

This document has been approved for operation within	All Trust Establishments
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Status	Approved
Person Responsible for Policy	Chief Operating Officer
Owner	Greater Manchester Academies Trust

Review Date	Changes Made	By Whom
21/10/22	<ul style="list-style-type: none">DPO statement added	Niall Beard

Data Protection Officer

The data protection officer (DPO) is responsible for overseeing the implementation of this policy, monitoring our compliance with data protection law, and developing related policies and guidelines where applicable.

They will provide an annual report of their activities directly to the Trust governing board and, where relevant, report to the Trust board their advice and recommendations on Academy data protection issues.

The DPO is also the first point of contact for individuals whose data the Trust processes, and for the ICO.

Full details of the DPO's responsibilities are set out in their job description. Our DPO is Andrew Woolley and is contactable via DPO@gmatrust.co.uk, DPO@gmacademiestrust.com or DPO@gmacademiestrust.co.uk.

With you...for you...about you...

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The categories of school workforce information that we collect, process, hold and share include:

- Personal information (such as name, employee or teacher number, national insurance number, right to work in the UK)
- Special categories of data including characteristics information such as gender, age, ethnic group
- Contract information (such as start dates, hours worked, post, roles and salary information)
- Work absence information (such as number of absences and reasons)
- Qualifications (and, where relevant, subjects taught)
- Relevant medical information
- Data related to staff performance

Why we collect and use this information

We use school workforce data to:

- Enable the development of a comprehensive picture of the workforce and how it is deployed
- Inform the development of recruitment and retention policies
- Enable individuals to be paid
- Provide personalized support for staff
- Ensure the best possible conditions in which to work are provided

The lawful basis on which we process this information

We only collect and use staff's personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest

Less commonly, we may also process staff's personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use staff's personal data, this consent can be withdrawn at any time.

We will make this clear when we ask for consent, and explain how consent can be withdrawn. Some of the reasons listed above for collecting and using staff's personal data overlap, and there may be several grounds which justify our use of this data

Collecting this information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

Storing this information

We keep personal information about you while you are employed by us. We may also keep it beyond your employment in order to comply with our legal obligations. The

Greater Manchester Academies Trust sets the policy for data storage across its constituent schools. A copy of this policy can be requested from MCA reception.

Who we share this information with

We routinely share some of this information with:

- Our local authority – to meet our legal obligations to share certain information with it
- The Department for Education – to meet our legal obligations to share certain information with it
- The Greater Manchester Academies Trust – to enable the trust to work effectively
- The staff member themselves or representatives – where a request has been submitted to view or amend personal data
- Ofsted – to enable Ofsted to carry out accurate inspections

- **Suppliers and service providers** – to enable them to provide the service we have contracted them for
- **Financial organisations** – to ensure school is financially transparent and accountable
- **Central and local government** – to meet our legal obligations to share certain information with it
- **Our auditors** – to ensure school is financially transparent and accountable
- **Survey and research organisations** – to allow accurate representations of school
- **Occupational health** – to ensure that staff are fit for work
- **Security organisations** – to allow school to effectively safeguard everyone
- **Professional advisers and consultants** – to ensure school can effectively deliver the best education
- **Charities and voluntary organisations** – to allow school to deliver extended educational opportunities
- **Police forces, courts, tribunals** – to allow school to carry out its statutory obligations
- **Professional bodies** – to ensure school can effectively deliver the best education
- **New employers** – in order to provide a reference

Why we share school workforce information

We do not share information about workforce members with anyone without consent unless the law and our policies allow us to do so.

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 staff with the (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Data collection requirements

The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/education/data-collection-andcensuses-for-schools>.

The department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested; and
- the arrangements in place to securely store and handle the data

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

To contact the department: <https://www.gov.uk/contact-dfe>

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact Andrew Woolley (A.Woolley@gmatrust.co.uk or dpo@gmatrust.co.uk), the trust's data protection officer.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- 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, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

For any further information, please contact Andrew Woolley – data protection officer for GMAT.

