Group Policy Document

Privacy Notice – Staff

Summary

This document tells you more about the information we collect, what we use the information for, how your information is stored and how long we keep it and what rights you have to the information.

If you are unsure about the validity of the content of this policy please refer to the Policy Owner.

Please Note: This policy is applicable to All settings within the Trust.

Policy owner	**Audit Committee**
Policy holder	**Paul Shanks, Chief Executive Officer**
Author	**Rebecca Schrooder, Trust Operations Manager**
Policy Inventory ID Number	**DP10**
Group Policy Area	**IT Security and GDPR Policies**

Approved by

Consultation Group	**Audit, ELT**
Approval Committee	**Audit Committee**
Implementation date	**July 2025**
Review Date	**July 2028**

Version Control

Control No	Change summary	Consultation Group	Effective date
01	Added a new section on filtering and monitoring, in line with changes to Keeping Children Safe in Education 2023.	Audit	June 2024
02	Additions relating to biometric systems, transferring data internationally and use of CCTV.	Audit	June 2025

Privacy Notice – How we use information about members of staff

Eastern Multi-Academy Trust (the Trust) is the data controller for information it uses and that used by its Academies:

To run the Trust and help learning and achievement for all of our students, the Trust collects and uses information about members of staff. In this document the Academy is referred to as 'We' or 'Ours'. Members of staff are referred to as 'You' or 'Your'

Much of the information we collect is classed as 'personal data' and our use of it is covered by a set of rules called the General Data Protection Regulation (GDPR) and the Data Protection Act (2018).

This document tells you more about:

- The information we collect
- What we use the information for
- How your information is stored and how long we keep it
- What rights you have to the information

What Information do we collect and use about staff?

We collect many different categories of information, for example:

- Personal details
- Contact details
- Banking details
- Taxation details
- Pension details
- Job application details
- Selection and interview records
- References received
- Identity verification records
- Performance assessment details
- Information for improving performance
- Annual leave records
- Records of communications
- Photographs of you or images on CCTV
- Information to identify you in School
- Records of transactions
- Information about the use of School IT systems
- Information about consultation with other professionals
- Biometric Systems - Where a school operates a biometric system for staff identification (where used, these are usually fingerprint-based systems found in catering and library applications but can include door entry and other systems) then the school will require explicit written consent from each intended user.

We also are required to collect and use information that is given additional protection under the GDPR, for example;

- Demographic information required for monitoring equal opportunities
- Information about health conditions and medical appointments

In addition:

Some school's within our Trust use CCTV cameras around the school site for security purposes and for the protection of staff and pupils. CCTV footage may be referred to during the course of disciplinary procedures (for staff or pupils) or to investigate other issues.

Why we collect and use this information

We use the information for some, or all, of the, reasons below;

- To enable you to work for us
- To support you in teaching and learning
- To maintain a safe environment for our pupils
- To provide appropriate pastoral care for our students
- To enable to you take part in appropriate training and professional development
- To help you to deliver the best support of our student and your colleagues
- To enable you to pay for meals in School
- To comply with our legal obligations to share information
- To ensure your health and safety
- To keep you up to date with news about the Academy or Trust
- To make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely

Use of your personal data for filtering and monitoring purposes

While you're in any of our trust's schools, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. child protection policy, IT acceptable use policy) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)

The legal basis for using this information

Depending on the purpose, our use of your information will be legal due to one of the following:

- Informed consent given by you [Article 6(1)(a)]
  For example: The use of banking information in our payment service

- To meet the terms of a contract
  For example: Recording the amount of annual leave you have taken

- To meet a legal requirement [Article 6(1)(c)]
  For example: Providing information to HMRC

- To protect the vital interests of you or someone else [Article 6(1)(d)]
  For example: Giving your contact details to emergency services

- Delivering a public task [Article 6(1)(b)]
  For example: Keeping records of meeting with parents

Where we use special category personal data we process this under the following exemptions from Section 9 of GDPR:

- Explicit consent given by you [Article 9(2)(a)]
  For example: The use of biometric information to identify you for our catering system
- Information used in the field of employment [Article 9(2)(b)]
  For example: Using information about ethnic origin for equality monitoring purposes
- To protect the vital interests of you or someone else [Article 9(2)(c)]
  For example: providing details of any medical conditions you have in the event of an emergency
- For substantial public interest [Article 9(2)(g)]
  For example: Using information about your health to ensure a safe working environment

Storing your personal data

Some of the personal data that we collect, and use, is added to your personnel file. Other data, depending on its purpose will be kept in other systems or in manual files. We use email to enable authorised users to transfer information to one another.

Some personal data is kept for different lengths of time. For example;

- Your personnel file is for 6 years after the date you leave employment
- Annual appraisals are kept for the current year and then for 5 years
- Records of any accident you have at work are kept for 12 years after the incident

If you'd like to know how long we keep a specific piece of personal data, please contact the Data Protection Officer whose details can be found at the end of this Privacy Notice.

We only keep your information for as long as we need it or for as long as we are required by law to keep it.

Sharing your personal data

At times we will share your personal data with other organisations and people. We will only do this when we are legally required to do so, when our policies allow us to do so or when you have given your consent.

Examples of people we share personal data with are:

- Family, associates and representatives of the person whose personal data we are processing who are authorised to receive the data
- The local authority in which the Academy or Trust resides
- HMRC
- The Department for Education
- Healthcare, social and welfare organisations
- Police forces and Courts
- Voluntary and charitable organisations
- Our suppliers and service providers

Where we share your personal data with someone who is a supplier or service provider we have taken steps to ensure that they treat your personal data in a way that meets the requirements of the GDPR.

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 to your personal data

You have rights relating to the personal data that we collect and use. Depending on the legal basis we are using the information you have different rights. If we are using your personal data based on your consent, you can withdraw that consent and we will stop using that personal data. Withdrawing your consent will need to be recorded in writing, please contact the Data Protection Officer.

The right to be informed:

If you ask us, we must tell you if we are collecting or using your personal data.

If we are collecting or using your personal data, you have:

The right of access to your personal data

You have the right to view the personal data that we hold about you, to receive a copy of the data and to be given more information about the data including any transfer to countries who do not fall under the requirements of the GDPR.

Some information we hold can not be accessed in this way. If you ask for information that is not available, there may be other ways of accessing it and we can help you.

To have access to your personal data we will need to collect details of what your want and in the first instance you can contact the Data Protection Officer whose details can be found at the end of this Privacy Notice. You will also need to supply us with standard information to verify your identity.

Other rights

You also have rights to ask us to correct inaccurate personal data, to ask us to stop using it or to object to us using it. For some data you may have to right to ask us to erase it, or to provide it in an electronic format that you can give to someone else. For some personal data if we are subjecting it to automated decision making then you have the right to object to this as request that a person is involved.

You will be given full details of these rights if you request access to your personal data or you can ask the Data Protection Officer.

Who to contact:

The Trust has the responsibility to ensure that your personal data is protected. It is called the **data controller.** All members of staff work for the data controller.

We recommend that you contact the data protection administrator:

Name of Person: Rebecca Schrooder
email address: rebecca.schrooder@eastern-mat.co.uk
Contact number: +441553779685
Contact address: Eastern Multi-Academy Trust, Queen Mary Road, King's Lynn, Norfolk, PE30 4QG

Trusts are also required to have someone called a Data Protection Officer or DPO. The DPO advises the Trust about issues to do with data protection, but can also help you, if you have a problem.

Our Data Protection Officer is:

Name of DPO:	GDPR Sentry Limited
email address:	support@gdprsentry.com
Contact number:	0113 804 2035
Contact address:	Unit 434 Birch Park, Thorp Arch Estate, Wetherby, West Yorkshire, LS23 7FG

If you have any questions about this privacy notice please contact the data protection administrator or the Data Protection Officer.

If you have a concern about the way we are collecting or using your personal data, we request 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/ or call 0303 123 1113.