

Privacy Notice for the Academy Workforce

Under data protection law, individuals have a right to be informed about how the academy 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 the academy workforce in line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

We, Carlton Bolling Academy, are the 'data controller' for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal information about you.

Our Data Protection Officer (DPO) is Mr D Harvey-Hill and can be contacted in writing:

Mr D Harvey-Hill
University Academy
Green Head Road
Utley
Keighley
BD20 6EB

The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our school. 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, 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 academy'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 academy, including to:

- ✓ Enable you to be paid
- ✓ Facilitate safe recruitment as part of our safeguarding obligations towards students
- ✓ Support effective performance management
- ✓ Inform our recruitment and retention policies
- ✓ Allow better financial modelling and planning
- ✓ Enable equalities 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 when:

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

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 academy's use of your data.

Collecting this information

Whilst 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 (and 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 legislation.

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:

- ✓ Local Authority, to meet our legal duties to share certain information with it, such as safeguarding concerns
- ✓ The Department for Education, to meet statutory obligations to provide them with information, especially with regard to data returns, such as census
- ✓ Your family and representatives, in case of emergency such as a health matter
- ✓ Educators and examining bodies, as necessary in the performance of our education function
- ✓ Our regulator, Ofsted, to enable it to evaluate the education we provide, which is in the public interest
- ✓ Suppliers and service providers, so they can provide the services we have contracted them for, such as payroll
- ✓ Financial organisations, so they can provide the services we have contracted them for
- ✓ Central and local government, to meet statutory obligations and legal duties to provide them with information
- ✓ Auditors, to demonstrate that we have taken appropriate action in providing our education service
- ✓ Trade unions and associations, to assist them in meeting statutory and legal obligations
- ✓ Health authorities, to comply with our legal and statutory obligations, with investigations and to support legal entitlements
- ✓ Security organisations, with regard to legal or safeguarding investigations and to assist in crime prevention, detection and prevention of fraud
- ✓ Health and social welfare organisations, to enable us to comply with our duty of care and statutory safeguarding duties for your wellbeing
- ✓ Professional advisers and consultants, to comply with entitlements and assist with claims
- ✓ Police forces, courts, tribunals, in order to uphold law and order
- ✓ Professional bodies, to verify information for legal purposes
- ✓ Employment and recruitment agencies, as necessary, in the performance of contracts with them

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 school 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 would like to make a request, please contact our Data Protection Officer.

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 a person)
- ✓ In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict its processing
- ✓ Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights please contact our Data Protection Officer, as above.

Complaints

We take any complaints regarding our collection and use of personal data 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 by writing to our Data Protection Officer, as above.

- ✓ Alternatively, you can make a complaint to the Information Commissioner's Office:
- ✓ Report a concern online at www.ico.org.uk/concerns
- ✓ Call: 0303 123 1113
- ✓ In writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF