



# PRIVACY NOTICE FOR GOVERNANCE

## Introduction

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold 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 and use personal data about individuals we employ, or otherwise engage, to work for Discovery Multi Academy Trust.

We, Discovery Multi Academy Trust, are the 'data controller' for the purposes of data protection law.

Our data protection officer is **Liz Easterbrook (Plymouth City Council)** (see 'Contact us' below).

## The personal data we hold

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

- Contact details
- Passport
- 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, deed poll papers
- Recruitment information, including copies of right to work documentation, references and other information included in an application or letter of application, 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, including any outcomes of monitoring undertaken
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence
- Photographs
- CCTV footage
- Data about your use of the school's information and communications system (Behaviour Watch)



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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 and sexual orientation
- Trade union membership
- Health, including any medical conditions, sickness records, occupational health referrals and relevant correspondence

## **Why we use this data**

The purpose of processing this data is to help us run the Trust, 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 modeling, planning and budgeting
- 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)

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 Trust's use of your data.



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## 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 our **Data Protection Policy**.

A copy of this policy is available under 'MAT Policies' at [www.discoverymat.co.uk](http://www.discoverymat.co.uk)

## 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 – to meet our statutory requirement to report on pupil progress and attainment
- Your family or representatives – for relevant communication purposes
- Our regulator, Ofsted - to meet our statutory requirement to report on pupil progress and attainment
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll, financial services and HR support
- Financial organisations – to enable the Trust to meet external audit and finance regulatory requirements
- Central and local government - to enable them to provide the service we have contracted them for, such as payroll, pensions and insurance services
- Our auditors - to enable the Trust to meet external audit and finance regulatory requirements
- Trade unions and associations – for payroll to action relevant deductions each month



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- Health authorities and organisations such as Occupational Health – to fulfill the Trust’s statutory duty of care towards all employments, and to fulfill legal employment obligations
- Security organisations - to enable us to keep our sites safe and secure
- Police forces, courts, tribunals – to meet our legal obligations to share certain information, such as safeguarding concerns and employment issues
- Employment and recruitment agencies – to facilitate relevant recruitment and HR processes
- Mandatory response to government statistical gathering i.e. Office for National Statistics

## **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 a clear format

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.



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## 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 our data protection officer.

## CCTV

We use CCTV in various locations around the Trust site to ensure it remains safe.

- We will follow the ICO's code of practice and their guidance for the use of CCTV.
- We do not need to ask individuals' permission to use CCTV, but we make it clear where individuals are being recorded.
- Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use.
- Any enquiries about the CCTV system should be directed to Alison Nettleship, Chief Executive Officer.

## 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 our data protection officer.

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



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If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

**Liz Easterbrook**

Schools Data Protection Officer

Finance

Plymouth City Council

Ballard House

Ground Floor

Plymouth

PLI 3BJ

T. 01752 398380

E. [liz.easterbrook@plymouth.gov.uk](mailto:liz.easterbrook@plymouth.gov.uk)

*N.B This notice is based on the [Department for Education’s model privacy notice](#) for the school workforce, amended to reflect the way we use data in Discovery Multi Academy Trust.*

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I confirm that I have read and understood the terms of the Discovery MAT Privacy Notice for Governance

Signed ..... Name.....

Date .....