



STAFF PRIVACY NOTICE FOR USE WITHIN THE TRUST

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| Name of policy writer | Jayne Newson |
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Introduction

SHARE Multi-Academy Trust, whose registered office is at Shelley College, Huddersfield Road, Shelley, Huddersfield HD8 8NL is the data controller for the use of personal data in this privacy notice.

The trust is registered with the ICO under registration number ZA479462.

The trust has a Data Protection Officer whose contact details are set out below:

Jayne Newson – Data Protection Officer

Email: jayne.newson@sharemat.co.uk

Tel: 01484 955007

By post to:

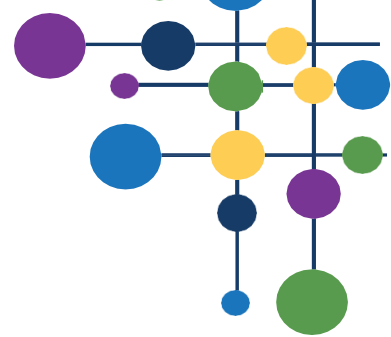
Mrs J Newson
Data Protection Officer
Heaton Avenue, A SHARE Primary Academy
South Parade
Cleckheaton
West Yorkshire
BD19 3AE

This privacy notice advises employees, self-employed staff and/or consultants and volunteers of our data protection responsibilities on the collection and processing of their personal information.

We collect and process personal data to support the operation of the trust and its schools and to assist in the running of the trust and its schools and to manage the employment relationship of, or otherwise manage, those who are engaged to work or perform services for us.

We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations. The trust processes personal data in accordance with UK GDPR, the Data Protection Act 2018, and other applicable UK data protection legislation, including relevant provisions under the Data (Use and Access) Act 2025.





The categories of information that we process

The categories of workforce information that we process include:

- Personal information (such as name, date of birth, address, e-mail, telephone number, teacher number, national insurance number, details of medical and health conditions, emergency contact details).
- Permitted details of employment checks (such as DBS number, right to work information, visa details, copy of identity and qualification check documents, information about a criminal record).
- Characteristics information (such as gender, age, marital status, sexual orientation, religious belief, ethnic group, nationality, country of birth, disability status).
- Contract information (such as start date, hours worked, employee number, post, roles, salary and benefits, bank details, work experience and employment history).
- Work absence information (such as details of periods of leave taken by you, such as holiday, sickness, maternity/paternity leave or other leave and the reasons)
- Personnel records (such as qualifications and skills, appraisal information, records of reasonable adjustments, disciplinary or grievance records, occupational health records, and where relevant, the subjects taught)

This list is not exhaustive.

Where processing is likely to result in a high risk to individuals' rights and freedoms, the trust carries out Data Protection Impact Assessments (DPIAs).

All third-party processors handling personal data on behalf of the trust are subject to contractual data protection obligations.

Why we collect and use workforce information

We use workforce data to:

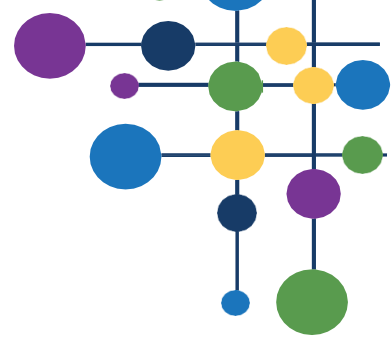
- a) Enable the development of a comprehensive picture of the workforce and how it is deployed
- b) Inform the development of recruitment and retention policies
- c) Ensure effective general HR and business administration
- d) To pay staff in accordance with their contract
- e) Facilitate safe recruitment
- f) Support the effective performance management of staff
- g) Allow better financial modelling and planning
- h) Enable ethnicity and disability monitoring
- i) To keep staff safe*
- j) To meet the statutory duties placed upon us by the Department for Education (DfE)
- k) To demonstrate the work of the trust and its schools
- l) To comply with our legal obligations as an employer.

** This includes using CCTV in certain locations on the school site for safeguarding, safety and security purposes.*

Under the UK General Data Protection Regulation (UK GDPR), the legal bases we rely on for processing personal information for general purposes are:

- for the purposes of (a), (b), (c), (f), (g) and (h) in accordance with the legal basis of Public task: collecting the data is necessary to perform tasks that the trust and its schools are





required to perform as part of their statutory function

- for the purpose of (d) in accordance with the legal basis of Contract: collecting the data is necessary to fulfil contracts of employment
- for the purpose of (e) in accordance with the legal basis of Legal obligation: carrying out safer recruitment checks and collecting and holding criminal record checks
- for the purpose of (i) in accordance with the legal basis of Vital interest: to keep workforce safe (food allergies, medical conditions)
- for the purposes of (j) in accordance with the legal basis of Legal obligation: data collected for the Department of Education (DfE) workforce census. Data is also collected to comply with health and safety, safer recruitment, tax laws and our duties in relation to individuals with disabilities and protected characteristics
- for the purpose of (k) in accordance with the legal basis of Consent: to use your personal data such as your image on our website, on our social media and in publications to promote the work of the trust and its schools
- for the purpose of (l) in accordance with the legal basis of Legal obligation.

Some information we process is considered more sensitive under data protection law, such as health information, ethnicity, religious beliefs, trade union membership and criminal records information. We only use this information where the law allows us to do so and where it is necessary to meet our legal obligations, safeguarding responsibilities, employment requirements and operational needs.

We may also process other sensitive information where necessary for safer recruitment, workforce management, occupational health, equality monitoring, safeguarding or legal compliance purposes. This may include information relating to attendance management, disciplinary matters, capability processes, DBS and safeguarding checks, and reasonable adjustments or support requirements.

Automated decision-making and profiling

The trust does not make solely automated decisions about staff.

Collecting workforce information

We may collect your personal data in a variety of ways. For example, data might be collected through:

- Job application forms
- Your passport or other identity documents, such as your driving licence
- From third parties such as former employers, the Disclosure and Barring Service (DBS) in carrying out safeguarding checks
- Forms completed by you at the start of or during your employment or engagement with us.
- Correspondence and communication with you
- Interviews, meetings or other assessments
- CCTV footage.

Workforce data is essential for the trust and its schools' operational use. Whilst most information you provide to us is mandatory, some of it is requested on a voluntary basis. To comply with the UK GDPR, we will inform you at the point of collection whether you are required to provide certain





information to us or if you have a choice.

Storing workforce information

We take the security of your personal data very seriously. Data is stored in the UK/Ireland, however some service providers may process limited personal data outside the UK. Where this occurs, appropriate safeguards are applied in accordance with UK GDPR. We have internal policies and controls in place to try to ensure that data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where we engage third parties to process personal data on our behalf, they do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

We hold employees, self-employed staff and/or consultants and volunteers' data securely for the set amount of time shown in our data retention schedule which is aligned with the IRMS Management Toolkit. For more information on our data retention schedule and how we keep your data safe, please visit our data protection policies available on SHARE Multi-Academy Trust's website.

Who we share workforce information with

We routinely share this information with:

- the Department for Education (DfE)
- the local authority
- SHARE Multi-Academy Trust.

CCTV footage may be shared with police or other lawful authorities where necessary for the prevention or detection of crime, safeguarding or where required by law. In addition to this, we regularly share information with a number of contracted third parties in order to carry out our public task of running the trust and its schools safely and effectively.

Why we share workforce information

We do not share information about our workforce members with anyone without consent unless the law and our policies allow us to do so. Personal data is transferred using secure methods such as encryption.

We share workforce data with the DfE on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

In addition, we have contracts with third parties for services such as payroll and occupational health or as part of cloud-based storage applications for the purpose of securely holding and protecting your data. Before entering into a contract, we ensure that adequate policies and security measures are in place.

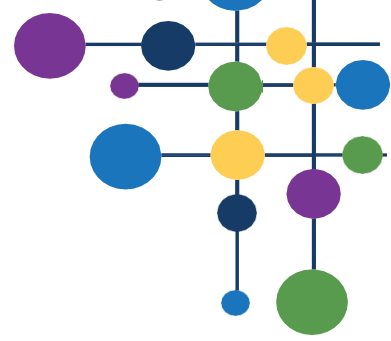
The Department for Education (DfE) collects personal data from educational settings and local authorities.

We are required to share information about our school employees with the DfE and our Local Authority under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

All information we share with the DfE and LA is transferred securely and held under a combination of software and hardware controls which meet the current government security policy framework, which can be found by following the link below:

<https://www.gov.uk/government/publications/security-policy-framework>





Where we have CCTV in operation, we need to monitor data to make sure the school sites are safe. Where CCTV operates on trust or school sites, images of staff may be captured for safety, security, safeguarding and crime prevention purposes. CCTV may also assist in the investigation of incidents, allegations, misconduct, health and safety matters or breaches of trust policies and procedures. Cameras are not installed in private areas such as toilet cubicles or changing rooms. Signage is displayed where CCTV operates. Access to footage is strictly limited to authorised personnel and is only permitted where there is a legitimate reason to do so. Retention periods are limited and all footage is stored securely.

How the government uses your data

The workforce information that we lawfully share with the DfE through data collections:

- Informs the DfE's policy on pay and the monitoring of the effectiveness and diversity of the school workforce
- Links to school funding and expenditure
- Supports longer term research and monitoring of educational policy.

You can find more information about the data collection requirements placed on us by the DfE by following this link: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

The DfE may share your information with third parties who promote the education or wellbeing of children or the effective deployment of school staff in England by:

- Conducting research or analysis
- Producing statistics
- Providing information, advice or guidance.

The DfE 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 and use of the information. The DfE makes decisions on whether they will share personal information with third parties based on an approval process, where the following areas are considered in detail:

- Who is requesting the information
- The purpose for which the information is required
- The level and sensitivity of the information requested
- The arrangements in place to securely store and handle the information.

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

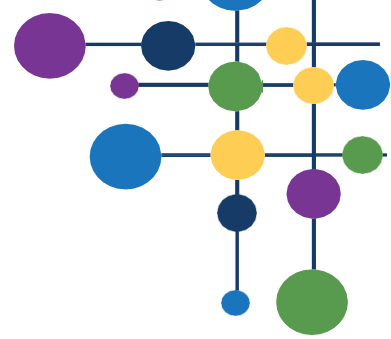
How to find out what personal information the DfE holds about you

Under the Data Protection Act 2018, you are entitled to ask the DfE what personal information it holds about you. You have the right to ask the DfE:

- If it processes your personal data
- For a description of the data it holds about you
- The reasons it is holding your data and any recipient it may be disclosed to
- For a copy of your personal data and any details of its source.

To exercise these rights, you should make a subject access request. Information on how to do this can be found by following this link:





<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

You can also contact the DfE directly using its online contact form by following this link: <https://www.gov.uk/contact-dfe>.

The use of Artificial Intelligence (AI)

The trust does not make solely automated decisions about employees, self-employed staff and/or consultants and volunteers. Any decisions affecting staff are reviewed by appropriately authorised staff. SHARE MAT follows strict data security and privacy controls.

The trust may use approved AI tools to support administrative and educational activities. AI tools are not used to make solely automated decisions about employees, self-employed staff and/or consultants and volunteers. Any use of AI involving personal data is subject to human oversight, security controls and data protection safeguards. The trust currently uses Microsoft 365 Copilot within its secure Microsoft environment.

Further information about the use of AI can be found in the SHARE MAT Artificial Intelligence Policy & Procedure.

Requesting access to your personal data

Under UK GDPR, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the trust's Governance Professional & Data Protection Officer, whose contact details are set out at the beginning of this privacy notice.

You also have the right to:

- Restrict our processing of your personal data, i.e. permitting its storage but no further processing
- Object to direct marketing (including profiling) and processing for the purposes of scientific and/or historical research and statistics
- Have your personal data rectified if it is inaccurate or incomplete
- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you
- Request the deletion or removal of personal data where there is no compelling reason for the continued processing.

We will normally respond to information rights requests within one calendar month.

The right to raise concerns, complaints or withdrawal of consent

If you have any concerns about the way we collect or process your data or you would like to discuss anything in this privacy notice, please contact the Data Protection Officer in the first instance.

You can also contact the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns>. The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.





Where we are processing your personal data with your consent, you have the right to withdraw that consent. This only applies where consent is the lawful basis and does not affect statutory processing.<mailto:>

If you require further information about how we and/or the DfE store and use your personal data, please visit our [website](#) where you can find the latest version of our Data Protection Policy, or the

Gov.UK website, (<https://www.gov.uk/guidance/data-protection><https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>).

If you require this privacy notice in an alternative format, please contact the Data Protection Officer.

Schedule of Amendment

| Version | Amendment |
|---------|---|
| 1.0 | New version |
| 2.0 | Strengthened the document in terms of AI governance, CCTV transparency, international transfers, children's transparency and DUAA 2025 awareness and technical wording amended to be more reader friendly |

