



Waterton Academy Trust – Privacy Notice – Personal Identifiable Information (PII)

Owner:	Data Protection Team	Date: 03 August 2023
Last reviewed on:	August 2023	
Next review due by:	November 2025	

We collect and use personal identifiable information (**PII**) under the principle of the Data Protection Regulation 2018 (GDPR 2018) for “specified, explicit and legitimate purposes”. The categories of personal identifiable information (**PII**) that we may collect, process, hold and share include:

- personal information (such as name, employee or teacher number, national insurance number, address, phone numbers, next of kin)
- special categories of data including characteristics information (such as gender, age, ethnic group, religious beliefs, SEND, bank details)
- contract information or enrolment information (such as start dates, hours, post, roles, salary information, educational results, declarations of interest, DBS data)
- absence information (such as number of absences and reasons)
- qualifications (for recruitment purposes, contracts and or tenders)
- ID Verification documents (Right to Work in UK, pupil enrolment, Safeguarding)
- Information about criminal convictions and offences. (for recruitment purposes and Safeguarding)

WHY WE COLLECT AND USE THIS INFORMATION

We collect this **PII** and special/sensitive 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 and enable individuals to make payments for services
- ascertaining your fitness to work within the capacity of your role or as a pupil, are fit to partake in classroom based learning
- comply with a legal obligations
- comply with Health & Safety obligations
- comply with Safeguarding obligation s

THE LAWFUL BASIS ON WHICH WE PROCESS THIS INFORMATION

We lawfully process this information to:

- enable the performance of the employment contract, e.g. to pay salaries or make pension contributions
- perform legitimate interests of the Trust and Academies, e.g. for administrative purposes
- process personal data to comply with legal obligation to disclose employee salary details to HMRC.
- comply with a legal obligation, e.g. under the public-sector equality duty, Health and Safety, Safeguarding and Safer Recruitment.
- To meet our obligations as a registered provider of education within the UK

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

Please see The Trusts Data Retention Policy for details of retention periods.

The Trust makes every effort to store, process and modify your PII with the highest standards and use leading external solution providers whereby systems are externally provisioned, such as Cloud applications.

WHO WE SHARE THIS INFORMATION WITH

We routinely share this information with:

- Wakefield Local Authority, Barnsley Local Authority, The Department for Education (DfE)

- Pensions providers, HMRC
- Government departments e.g. for the completion of statutory returns
- Third parties, including software providers, to support the operation of the academies and the Trust operations
- Police, Social Services and Safeguarding services

WHY WE SHARE INFORMATION

We do not share information about workforce members with anyone without consent unless the law and our policies allow us to do so. Local authority We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments. 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 pupils 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 employees and pupils in Academies (including Multi Academy Trusts) and local authorities that work in state funded Academy (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision) or are on role within a state funded Academy. 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-and-censuses-for-schools>

The department may share information about school employees and pupils 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 Trust/Academy workforce and cohort 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. This is commonly known by a Subject Access Request (**SAR**). To make a request for your personal information, please contact the Data Protection Officer. Please provide:

- Name of individual, correspondence address, contact number and email address
- Details of the information being requested

You also have the right to:

- Be informed, to access, to rectification, erasure, restrict processing, data portability, object to automated decision making.

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with the Data Protection Officer or CEO in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

FURTHER INFORMATION

If you would like to discuss anything in this privacy notice, please contact the Data Protection Officer as detailed below:

Mr Ian Burns (DPO)

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Email: dataprotection@watertonacademytrust.org