

# PRIVACY NOTICE - STAFF

## Document Control

Reference: GDPR REC 4.1

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## 1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

## 2. Responsibilities

2.1 The Data Protection Officer / GDPR Owner is responsible for ensuring that this notice is made available to data subjects prior to White Rose Academies Trust collecting/processing their personal data.

2.2 White Rose Academies Trust, who interacts with data subjects, are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

## 3. Privacy notice

### 3.1 Who are we?

**White Rose Academies Trust** is a multi-academy trust of three secondary age schools in the City of Leeds, West Yorkshire, England, with around 2,750 students and 360 staff.

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- (cale.t@whiteroseacademies.org)
- (0113 229 5454)

The personal data we would like to collect from you is:

<b>Personal data type:</b>	<b>Source</b> (where White Rose Academies Trust obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources):
<ul style="list-style-type: none"><li>• Personal details (name, address, date of birth, NI number, Passport number)</li><li>• Family details</li><li>• Lifestyle and social circumstances</li><li>• Financial details (bank details)</li><li>• Education and employment details</li><li>• Training records</li><li>• Visual images (CCTV, photographs)</li></ul>	<ul style="list-style-type: none"><li>• Course and training records</li><li>• CCTV recording devices (held for 14 days)</li></ul>
<ul style="list-style-type: none"><li>• Physical or mental health details</li></ul>	

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<ul style="list-style-type: none"><li>• Racial or ethnic origin</li><li>• Religious or other beliefs</li><li>• Sexual orientation</li><li>• Trade union membership</li><li>• Offences and alleged offences</li><li>• Criminal proceedings, outcomes and sentences</li><li>• Biometric information</li></ul>	
<ul style="list-style-type: none"><li>• Printing records</li><li>• Voicemails</li></ul>	<ul style="list-style-type: none"><li>• Pcounter print management system</li><li>• Callstream/Bistech phone management</li></ul>

The personal data we collect will be used for the following purposes:

- HR records management
- Payroll and pensions
- Safeguarding
- Employment relations
- Staff support
- Staff learning and development

Our legal basis for processing for the personal data:

- White Rose Academies Trust processes data in order to fulfill contractual obligations to a number of bodies, such as:
  - Education and Skills Funding Agency (ESFA)
  - Exam boards (OCR, AGA, Pearson, Edexcel, WJEC, NCFE, GL Assessment, PET-Xi, ASDAN, VTCT, Sports Leaders UK, UCLES)
  - Healthcare, social and welfare organisations
  - Police forces, courts and tribunals
  - Local and central government
  - Department for Education (DfE) – we are required to share information about our employees with the DfE under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments
- Privacy notice for this personal data processing is recorded on White Rose Academies Trust website <http://www.whiteroseacademies.org/dataprotection> (GDPR REC 4.1)

The special categories of personal data concerned are:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Trade union membership
- Data concerning health and sexual orientation
- Biometric data where processed to uniquely identify a person

### 3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for White Rose Academies Trust to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by completing the Data Subject Withdrawal Form available from the academy intranet or the website

<http://www.whiteroseacademies.org/dataprotection> *GDPR DOC 2.7A*.

### 3.3 Disclosure

White Rose Academies Trust will not pass on your personal data to third parties without first obtaining your consent. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:

Third country (non-EU)/international organisation	Safeguards in place to protect your personal data	Retrieve a copy of the safeguards in place here:
None		

### 3.4 Retention period

White Rose Academies Trust will process personal data for whilst you are an employee and will store the personal data for a number of years. The retention period for different classifications of personal data has been established in line with information management guidelines. Please refer to [GDPR DOC 2.3](#) for data retention periods.

### 3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that White Rose Academies Trust refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

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### 3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by White Rose Academies Trust (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and White Rose Academies Trust's data protection representatives, the Data Protection Officer / GDPR Owner.

The details for each of these contacts are:

	<b>Supervisory authority contact details</b>	<b>[Data Protection Officer (DPO)] / [GDPR Owner] contact details</b>
Contact Name:	<a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>	Toby Cale
Address line 1:		White Rose Academies Trust
Address line 2:		Intake Lane
Address line 3:		Leeds
Address line 4:		West Yorkshire
Address line 5:		LS13 1DQ
Email:		<a href="mailto:cale.t@whiteroseacademies.org">cale.t@whiteroseacademies.org</a>
Telephone:	0303 123 1113	0113 229 5454

### 3.7 Privacy statement

Read more about how and why we use your data here

<http://www.whiteroseacademies.org/gdpr>

## 4. Online privacy statement

### Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

### How we use your information

This privacy notice tells you how we, White Rose Academies Trust, will collect and use your personal data.

## Why does White Rose Academies Trust need to collect and store personal data?

In order for us to provide you with a service, we need to collect personal data your employment, course studies, examination and safeguarding. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes, White Rose Academies Trust would contact you for additional consent.

## Will White Rose Academies Trust share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to White Rose Academies Trust in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with their procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

## How will White Rose Academies Trust use the personal data it collects about me?

White Rose Academies Trust will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. White Rose Academies Trust is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific educational sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

## Under what circumstances will White Rose Academies Trust contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

## Can I find out the personal data that the organisation holds about me?

White Rose Academies Trust at your request can confirm what information we hold about you and how it is processed. If White Rose Academies Trust does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of White Rose Academies Trust or a third party, information about those interests.

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- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

### What forms of ID will I need to provide in order to access this?

White Rose Academies Trust accepts the following forms of ID when information on your personal data is requested:

Passport, driving licence, birth certificate, utility bill (from last 3 months), etc.

### Contact details of the Data Protection Officer / GDPR Owner:

	<b>Data Protection Officer / GDPR Owner contact details</b>
Contact Name:	Toby Cale
Address line 1:	White Rose Academies Trust
Address line 2:	Intake Lane
Address line 3:	Leeds
Address line 4:	West Yorkshire
Address line 5:	LS13 1DQ
Email:	<a href="mailto:cale.t@whiteroseacademies.org">cale.t@whiteroseacademies.org</a>
Telephone:	0113 229 5454

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### *Document Owner and Approval*

The Data Protection Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the White Rose Academies Trust academies staff intranets and White Rose Academies trust website

This procedure is published on a version controlled basis.

### **Change History Record**

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	<Manager>	02/02/2018