Privacy Notice - About Adults

1. We are a data controller for the purposes of the Data Protection Act. We hold personal data about **staff members** in order to:
   - Enable individuals to be paid.
   - Improve the management of school workforce data across the sector.
   - Enable the development of a comprehensive picture of the workforce and how it is deployed.
   - Inform the development of recruitment and retention policies.
   - Allow better financial modelling and planning.
   - Enabling monitoring of selected protected characteristics.
   - Support the work of national review bodies such as the School Teacher Review Body.

2. Personal data includes identifiers such as name, teacher number, national insurance number; characteristics such as gender, age, ethnic group; any relevant medical information; employment contract and remuneration details, qualifications and absence information. It also includes electronic identifiers such as IP and email addresses.

3. We hold the majority of this information in order to fulfil a contract or discharge our legal obligations under employment or health & safety law. Some data is held in order to fulfil a public task, such as delivery of extra-curricular activities, and some is held on the basis of your consent such as participation in trips and use of biometric data within some schools for library and cashless catering purposes. Where sensitive personal data is held, this is under the categories of employment, social security or social protection law or substantial public interest in order to fulfil our official function and statutory purpose. In line with recommended data retention guidance, most of the data collected about staff members will be held until six years after leaving the Trust at which point it will be subject to secure disposal. In some instances, such as Control of Substances Hazardous to Health (COSHH) monitoring or accident recording/investigation, data will be held for 40 years and 12 years respectively and is then subject to review. In respect of pensions, data and evidence supporting pension benefits will be kept indefinitely, as advised by Teachers Pensions and Local Government Pension Services.

4. We are required by law to pass on some of this data to:
   - The Local Authority (LA) and Department for Education (DfE), under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.
   - The DfE on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation and links to school funding/expenditure and the assessment educational attainment.
   - Pensions organisations where relevant.
   - Government departments such as His Majesty's Revenue and Customs (HMRC) or the Health & Safety Executive (HSE).

5. We operate CCTV which will capture images for the purpose of protecting the school buildings and assets, increasing personal safety, reducing crime and supporting the Police, and to investigate student and staff behaviour where appropriate. We also store images of staff for identification purposes. Where photographs are taken for other purposes, consent is sought to use the images.

6. We also share information with service providers where relevant such as payroll services, human resource support, occupational health services, online payment providers and cashless catering providers. We and they will comply with the above Acts, only sharing and holding details which are relevant and necessary for the purpose identified. If you require more information, please ask for details.

7. The DfE may also share information we provide to them with third parties who promote the education or wellbeing of children or the effective deployment of school staff. 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 it and its use. Decisions about whether the DfE releases this personal data to third parties are subject to a robust approval process and are based upon a detailed assessment of who is requesting the data, the purpose for which it is required, the level of sensitivity of data requested and the arrangements in place to store and handle the data. For more

information about the department's data sharing process, please visit: https://www.gov.uk/data-protection-howwe-collect-and-share-research-data. To contact the DfE, please visit: https://www.gov.uk/contact-dfe.

8. There may be some occasions when we are required to provide personal data by enforcement agencies. This could include purposes such as national security, public security and health and the detection or prosecution of criminal offenses.

9. We also collect data about **other adults**, this includes parents/carers, trustees, governors, volunteers, job applicants, contractors, service providers and members of the public visiting our site. The data collected includes:
   - CCTV images.
   - Audio recordings of telephone calls.
   - Application information and records which reflect the roles discharged by individuals e.g. trustees, governors, volunteers.
   - Job application information where applicants are unsuccessful, including pre-employment checks that are in line with Keeping Children Safe in Education and includes online searches.
   - Application information which supports student bursary funding.
   - Payment information in respect of items purchased from us.
   - The fact that a Disclosure and Barring Service check has been completed.
   - Next of kin/contact details where relevant.
   - Course attendance and payment records in respect of teaching school hub activities.

10. Data retention of the above is as follows:
   - CCTV and audio recordings are retained for: date of recording plus 50 days and 2 months respectively.
   - Trustee/governor/volunteer records are retained for: date of leaving plus 6 years.
   - Unsuccessful job application information: date of appointment of successful candidate plus 6 months.
   - Financial data is retained for: current year, plus 6 years.
   - Disclosure and Barring check facts are retained on the single central record - current data.
   - Teaching School Hub data is retained for; current year, plus 3 years.

11. Individuals also have the right to:
   - Object to processing of personal data that is likely to cause, or is causing, damage or distress.
   - Prevent processing for the purpose of direct marketing.
   - Object to decisions being taken by automated means.
   - In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed.
   - Claim compensation for damages caused by a breach of the Data Protection regulations.
   - Where specific data has been collected under the basis of consent, individuals can withdraw their consent at any time.

12. Under data protection legislation, individuals have the right to request access to information we hold about them. Verification of identification will form part of this process. Provision of information is initially free of charge, however, should a request be deemed as manifestly unfounded or excessive, particularly if it is repetitive, a fee may be charged which will be representative of the administrative cost for providing the information.

13. If you have a concern about the way we are collecting or using your personal data, please raise this with us in the first instance so that we can assist you. The Trust has processes in place to deal with your queries, please use the contact details below:

    Horncastle Educational Trust **dataprotection@horncastleeducationtrust.org** **01507 522465**

14. In the event of us not being able to deal with your request satisfactorily the regulatory authority for data protection is the Information Commissioner's Office. They can be contacted at https://www.ico.org.uk/concerns.