

Privacy Notice for Workforce

Who processes your information?

Keystone Academy Trust is the data controller of the personal information you provide to us. This means they determine the purposes for which, and the manner in which, any personal data relating to staff is to be processed. A representative of the trust, Tracey Roscher, can be contacted on 01406 363381 or tracey.roscher@keystonemat.org

Ark ICT Solutions provide our data protection officer services. Their role is to oversee and monitor the trust's data processing practices. They can be contacted at:

Joe Lee Data Protection Officer - Joe.lee@ark.me.uk

Where necessary, third parties may be responsible for processing staff members' personal information. Where this is required, the trust places data protection requirements on third party processors to ensure data is processed in line with staff members' privacy rights.

Why do we need your information?

Keystone Academy Trust has the legal obligation and a legitimate interest to collect and process personal data relating to those we employ to work for the trust, or those otherwise contracted to work for the trust. We process personal data in order to meet the safeguarding requirements set out in UK employment and childcare law, including those in relation to the following:

- The Keystone Academy Trust Funding Agreement
- The Academy's legal framework
- Safeguarding Vulnerable Groups Act 2006
- The Childcare (Disqualification) Regulations 2009

Staff members' personal data is also processed to assist in the running of the trust, and to enable individuals to be paid.

If staff members fail to provide their personal data, there may be significant consequences. This includes the following:

Employment checks:

Failure to provide the trust with ample proof of the right to work in the UK will prevent employment within Keystone Academy Trust.

Employees found to be working illegally could face prosecution by law enforcement officers.

Salary requirements:

Failure to provide accurate tax codes and/or national insurance numbers could lead to issues of delayed payments or an employee paying too much tax.

For which purposes are your personal data processed?

In accordance with the above, staff members' personal data is used for the following reasons:

- Contractual requirements
- Employment checks, e.g. right to work in the UK
- Salary requirements

Which data is collected?

The personal data the Trust will collect includes but is not limited to the following:

- Names
- Date of Birth
- Marital status
- National insurance number
- Characteristics such as ethnic group
- Employment contracts
- Telephone Number
- E-mail address
- Bank details
- Remuneration details
- Qualifications
- Absence information
- Disability
- Right to work in the UK
- DBS and Prohibition details
- Performance data

The collection of personal information will benefit both the DfE and LA by:

- Improving the management of workforce data across the sector
- Enabling the development of a comprehensive picture of the workforce and how it is deployed
- Informing the development of recruitment and retention policies
- Allowing better financial modelling and planning
- Enabling ethnicity and disability School Teachers' review body

Will your personal data be sought from third parties?

Staff members' personal data is only sought from the data subject. No third parties will be contacted to obtain staff members' personal data without the data subject's consent.

Staff members' personal data may be obtained and processed from third parties where the law requires the trust to do so. The categories of data obtained and processed from third parties include:

- References obtained from previous employers
- Medical records from Heales for our pre-employment medical checks
- DBS checks are processed via Online SCR. The necessary identity documentation will be collected in line with DBS checking requirements. The documents provided will be shredded on completion of the certificate.

Where data is obtained from third parties, the personal data originates from the following sources:

- Taylor Shaw
- Premier Sport
- Elite Sports
- Inspire+
- Sport2Day
- Neo People
- ITT Providers
- Providers of extra-curricular activities including music
- Staff supply agencies
- Lincolnshire Music Service
- Turn IT On IT provision
- Providers of grounds maintenance services

How is your information shared?

Keystone Academy Trust will share your personal information with Neo People our payroll provider (we will not pass your information to any third parties without your consent, unless the law allows us to do so).

We routinely share your information with, but not limited to the following :

- The LA
- The DfE
- The Teachers' Pension Scheme or West Yorkshire Pension Fund

Sharing with the LA

We are required to share information about our workforce with our LA under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Sharing with the DfE

The DfE collects personal data from educational settings and LAs via various statutory data collections.

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

All information we share with the DfE is transferred securely and held by the DfE under a combination of software and hardware controls which meet the current government security policy framework, <https://www.gov.uk/government/publications/security-policy-framework>

How does the government use 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 trust 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 trust 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>.

Sharing with the Pension Funds

We share data with the pension funds, (either the Teachers' Pension Scheme, or the LA Pension Fund), to allow accurate records to be kept of your pension entitlement.

This information is necessary to ensure they hold the correct data for the administration of the scheme as outlined in the scheme regulations, which can be found in the Teachers' Pension Scheme Regulations (<https://www.teacherspensions.co.uk/public/legal.aspx>) or in the LGPS Pension Regulations (<https://www.lgpsregs.org/>).

How long is your data retained for?

Staff members' personal data is retained in line with Keystone Academy Trust's Records Management Policy. If you require further information regarding retention of data, and the periods for which your personal data is held for, please download our Records Management Policy which can be found on our website www.keystoneacademytrust.org.uk.

What are your rights?

As the data subject, you have specific rights to the processing of your data.

You have a legal right to:

- Request access to the personal data that the trust holds
- Request that your personal data is amended
- Request that your personal data is erased
- Request that the processing of your data is restricted

Where the processing of your data is based on your explicit consent, you have the right to withdraw this consent at any time. This will not affect any personal data that has been processed prior to withdrawing consent.

Staff members also have the right to lodge a complaint with the Information Commissioner's Office (ICO) in relation to how Keystone Academy Trust processes their personal data.