



Empowering Individuals. Learning Together.

Date Adopted: April 2018

Next Review: April 2020

Signed on behalf of Trustees:

Date:

References made to the United Nations Conventions on the Rights of the Child.

Article 2 - The convention applies to everyone

Article 3 - Best interest of the child

Article 28 - All children have the right to a primary education

Diversa Multi Academy Trust including:

Angel Road Infant School

Angel Road Junior School

North City Children's Centre

Bignold Primary School (including Butterflies and Caterpillars)

Throughout the Policy Diversa MAT will refer to the Trust and the settings within it. Where there are specific setting contexts these will be included in appendices.

Diversa MAT Employee privacy notice

Data controller: [Clare Jones clare.jones@diversamat.org.uk

Data protection officer: [Name and contact details]

What is the purpose of this document?

Diversa MAT is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all employees and workers.

Diversa MAT is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former employees and workers. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection. For example, information about an individual's:

- race
- ethnic origin
- politics
- religion
- trade union membership
- genetics
- biometrics (where used for ID purposes)
- health
- sex life
- sexual orientation

Information about any criminal convictions is also given a similarly higher level of protection under the GDPR.

What information do we hold about you?

We will collect, store, and use the following categories of personal information about you:

Personal details	<ul style="list-style-type: none"> • Name • Date of birth • Gender • Marital/civil partnership status • Dependants • Gender recognition certificate
Contact details	<ul style="list-style-type: none"> • Address • Home phone number • Email address • Work mobile number
Other kinds of national identifier	<ul style="list-style-type: none"> • National Insurance Number (NINo) • Biometric residence card number • Driving licence

Special category data	<ul style="list-style-type: none"> • Racial or ethnic origin • Nationality <ul style="list-style-type: none"> ○ Diversity declaration form • Religious beliefs • Union membership deductions • Sexual orientation • Health data including disabilities <ul style="list-style-type: none"> ○ Sickness absence ○ Occupational health and MIRS referrals, reports and letters ○ Pre-employment health check outcome ○ Access to work assessments and adjustments recommended and implemented • Childcare disqualification check outcome • Prohibition order check outcome • Criminal convictions and offences <ul style="list-style-type: none"> ○ Pre-employment declarations ○ DBS
Education	<ul style="list-style-type: none"> • Schools and further / higher education establishments attended • Qualifications
Employment history	<ul style="list-style-type: none"> • Job(s) • Former employers/work history • Breaks in employment and reasons for these • Professional qualification(s) • Professional membership(s) • Referees

<p>Current employment</p>	<ul style="list-style-type: none"> • Start date in post • Start date with Norfolk County Council Diversa • Continuous local government service • Employee number/payroll number • Name of Department/Service school • Holiday entitlement • Recruitment information including application form • Right to work documentation • References • Information included in an application form or CV including supporting statement as part of the recruitment process • Psychometric or other skills tests as part of a recruitment or assessment process • Employment records eg posts held, change of hours/location/length of contract • Working hours (full time or part time) and flexitime records • Details of your schedule (days of work and working hours per annum) and attendance at work]; • Training or other learning certification and/or records • Incident report forms • Sickness or other paid absences eg maternity, disability leave • Parental leave or other unpaid absence • Flexible working requests • Health and safety information eg incident forms, Display Screen equipment assessment • Performance development discussion records • Disciplinary and grievance records • Formal performance management/ capability records
<p>Preferences</p>	<ul style="list-style-type: none"> • Preferred contact method • Paper payslips • Name “known as”
<p>Financial</p>	<ul style="list-style-type: none"> • Bank details • Salary and payroll information • Overpayments • Insurance claims • Compensation payments • Tax code and status • P60 • PAYE • Pension deductions • Salary sacrifice deductions • Statutory deductions eg child support, student loans

	<ul style="list-style-type: none"> • Give As You Earn ????
Contractual information	<ul style="list-style-type: none"> • Employment contracts inc written statement of particulars and offer letter
Social Relationships	<ul style="list-style-type: none"> • Marital or civil partnership status • Next of Kin • Emergency contact
Documentary Data	<ul style="list-style-type: none"> • Passport • Immigration status • Leave to remain • Right to work documentation • Certificate of sponsorship and work Visas • Drivers licence • Birth certificate • Evidence of name change e.g. Marriage certificate, deed poll etc • Teacher number
Consent	<ul style="list-style-type: none"> • Any permissions or consents relating to collecting and processing individual's data • Consent for who we might share individual employees' data with
Locational	<ul style="list-style-type: none"> • Contractual location/work base • Mobile phone location data • CCTV footage • Swipecards entry/exit records • Use of internet data • Information about your use of our information and communications systems.

We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information, and information relating to criminal convictions, in the following circumstances:

- Where we need to carry out our legal obligations or exercise rights in relation to your employment with us. We will have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.
- Where it is in the substantial public interest to do so, and it is necessary for the administration of justice or a statutory function
- Where it is necessary for under other grounds authorised by law, including the prevention or detection of unlawful acts or protecting the public against dishonesty. In these circumstances, the information would only be processed

where it is in the substantial public interest to do so and where it must be carried out without your consent so as not to prejudice these purposes.

- Where it is needed in the substantial public interest, such as for equal opportunities monitoring. This is subject to a number of safeguards, including your right to give notice that you do not want your data to be used in this way. We will explain this right further to you at the time this information is collected.
- In limited circumstances in relation to the occupational pension scheme. This will only be where **Diversa MAT** cannot reasonably be expected to obtain your consent and we are not aware of you deciding to withhold your consent. **Diversa MAT** (as administrators of the LGPS and TPS) have in place an appropriate policy document and safeguards which they are required by law to maintain when processing such data.
- Where it is in the substantial public interest and is necessary for the safeguarding of children and individuals at risk subject to safeguards and conditions set out in paragraph 18 schedule 1 of the DPA 2018
- In some cases, with your explicit written consent. We do not need your consent if we use special category information, including in relation to any criminal convictions, where it is necessary in accordance with one of the grounds set out above. However, in limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.
- [Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.]

We will use your particularly sensitive personal information in the following ways:

- information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace, to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer the occupational sick pay scheme.
- We will use information about your race or national or ethnic origin, religious, beliefs, or your sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We will use trade union membership information to pay trade union premiums and to comply with employment law obligations

We process information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with the school's **Employing People with Criminal Convictions** policy.

Less commonly, data protection legislation also allows us in limited circumstances to use any information we hold that is special category data or data relating to criminal convictions for other purposes that are set out in Schedule 2 of the Data Protection Act 2018. These include in certain cases, and subject to safeguards, where it is necessary in relation to legal claims, in certain circumstances where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you or by the police while you are working for us. We will use information about criminal convictions and offences to assess your suitability for continuing employment in your post.

How is your personal information collected?

We collect personal information about employees and workers through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies [LIST OTHERS]. What might these be?

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

This information is collected in a number of ways. E.g.:

- application forms;
- joining process
- passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment
- correspondence with you
- interviews
- references
- meetings
- other assessments
- [are there others?]

Situations in which we will use your personal information and our legal basis for processing the data

The school will only collect and process personal data where it has a legal basis to do so. In the context of employee information the most common legal reasons are:

- Performance of a contract
- Comply with a legal obligation
- Carry out a task in the public interest
- We have a legitimate interest in processing the data

We may also use the following legal reasons:

- You have given us consent to use it in a certain way - where this is the case you may withdraw your consent at any time. You will be told how to do this when we request your consent.
- We need to protect your vital interests (or someone else's interests)

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

The situations in which we will process your personal information are listed below. Where it is a special category of data we will make this clear and list both the Article 6 and Article 9 (special category) legal basis' for processing. Where it is not a special category of data the legal basis for processing listed is the Article 6 legal basis.

What we use your personal information for	Legal basis for processing
Making a decision about your recruitment or appointment.	To fulfil the contract of employment Legal obligation under Keeping Children Safe in Education statutory document
Checking you are legally entitled to work with children or vulnerable adults	Processing is necessary for the performance of a task carried out in the public interest Legal obligation under the Safeguarding Vulnerable Groups Act 2006 to undergo a vetting process for all individuals working with children and vulnerable adults and legal obligation under Keeping Children Safe in Education statutory document
Maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights	Necessary for the performance of the contract
Determining the terms on which you work for us.	Necessary for the performance of a contract

<p>Checking you are not disqualified from working with children</p>	<p>Legal obligation under the Childcare (Disqualification) Regulations 2009 and Keeping Children Safe in Education statutory document</p>
<p>Checking you are legally entitled to work in the UK.</p>	<p>Processing is necessary for the performance of a task carried out in the public interest</p> <p>Legal obligation under the Asylum and Immigration Act 2006 to prevent illegal working by carrying out document checks to confirm if a person has the right to work in the UK.</p>
<p>Providing the following benefits to you: e.g. Norfolk Rewards.</p> <p>Delete this as not applicable with Diversa</p>	<p>To fulfil the contract you have entered into with the service provider by confirming your continuing employment with the school</p>
<p>Liaising with your pension provider.</p>	<p>Legal obligation under the Pensions Act 2008 to provide a workplace pension and manage employer and employee contributions.</p>
<p>Paying you, and making tax and NI deductions as required by HMRC</p>	<p>Processing is necessary for the performance of a task carried out in the public interest - Legal obligation to ensure employees are paid under the Employment Rights Act 2002.</p> <p>Processing is necessary for the performance of a task carried out in the public interest - Legal duty to ensure employees and employers pay the correct income tax and National Insurance Contributions (NICs) under the following legislation</p> <ul style="list-style-type: none"> • Income Tax (PAYE) Regulations 2003 • National Insurance Contributions and Statutory Payments Act 2004

<p>Statutory reporting to HMRC</p>	<p>Processing is necessary for the performance of a task carried out in the public interest - Legal obligation to inform HMRC of payments made under Income Tax (PAYE) Regulations 2003</p>
<p>Statutory payments and deductions - e.g. Statutory Sick Pay, Statutory Maternity Pay etc</p>	<p>Processing is necessary for the performance of a task carried out in the public interest - Legal obligation to ensure employees receive the correct statutory payments under the following legislation</p> <ul style="list-style-type: none"> • The Statutory Shared Parental Pay (General) Regulations 2014 • The Statutory Maternity Pay (General) Regulations 1986 • The Statutory Paternity Pay and Statutory Adoption Pay(General) Regulations 2002 • Employment Rights Act 2002
<p>Administering the contract we have entered into with you.</p>	<p>To fulfil the contract of employment with you</p>
<p>Conducting performance reviews, managing performance and determining performance requirements.</p>	<p>To fulfil the contract of employment with you</p>
<p>Making decisions about salary reviews and compensation.</p>	<p>To fulfil the contract of employment with you</p>
<p>Making decisions about your continuous employment or engagement</p>	<p>Legal obligation under Safeguarding Vulnerable Groups Act 2006 (if barred from working with children, to fulfil the contract of employment with you) and Keeping Children Safe in Education statutory document</p> <p>Article 9 Special category of data Substantial public interest ground - legal obligation (if barred from working with vulnerable groups)</p> <p>Processing is necessary in respect of employment obligations</p>

<p>Making arrangements for the termination of your employment or engagement</p>	<p>Legal obligation (if barred) from working with children, to fulfil the contract of employment with you.</p> <p>Article 9 Special category of data Substantial public interest ground - Legal obligation (if barred from working with vulnerable groups)</p> <p>Processing is necessary in respect of employment obligations.</p>
<p>Employee liability information in advance of a TUPE transfer</p>	<p>Processing is necessary for the performance of a task carried out in the public interest - Legal obligation under the Transfer of Undertakings Regulations 2006, the outgoing employer must provide information about the identities and employment of the transferring employees.</p>
<p>Assessing qualifications for a particular job or task, including decisions about promotions.</p>	<p>To fulfil the contract of employment with you</p>
<p>Gathering evidence about grievance, disciplinary or other capability investigation</p>	<p>To fulfil the contract of employment with you</p>
<p>Dealing with legal disputes involving you or other employees, workers and contractors including accidents at work</p>	<p>To fulfil the contract of employment with you</p>
<p>Education, training and development requirements.</p>	<p>To fulfil the contract of employment with you</p>
<p>Special category of data: Obtaining occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled</p>	<p>Compliance with a legal obligation - the obligation not to dismiss an employee unfairly (Employment Rights Act). Defence of a legal claim where one has been made and to fulfil the contract of employment with you.</p> <p>Article 9: processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of</p>

	the employee, medical diagnosis, the provision of health or social care treatment or the management of health or social care systems and services and processing is necessary for carrying out rights and obligations under employment law.
Managing sickness absence by operating and keeping a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled	To fulfil the contract of employment with you and to comply with a legal obligation to pay SSP where required.
Identifying and implementing adjustments	<p>Processing is necessary for the performance of a task carried out in the public interest - Legal duty under the Equalities Act 2010 to implement any reasonable adjustments required</p> <p>Article 9 Special category of data Substantial public interest ground - Legal duty under Health and Safety legislation</p>
Operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the organisation complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;	To fulfil the contract of employment with you and to comply with a legal obligation to pay statutory leave where required.
Gathering data on apprentices and apprenticeships in the school to provide information to requesting bodies for reporting purposes.	Legal obligation under the Public Sector Apprenticeship Targets Regulations 2017' which were made under powers conferred by the Apprenticeships, Skills, Children and Learning Act 2009.
Gathering personal data to offer	Legitimate interests to keep skills

redeployment support if required	within the school workforce.
Dealing with legal disputes involving you or other employees, workers and contractors including accidents at work	To fulfil the contract of employment with you
Complying with health and safety obligations	Legal obligation under the Health and Safety at Work Act 1974
Fulfilling fair processing notice requirements	Legal obligation under the Education (Supply of Information about School Workforce) (England) Regulations 2007 to provide the DfE with information on members of the school workforce.
Workforce reporting requirements e.g, Fair processing notice requirements, Gender Pay gap reporting, Trade union facilities time, Apprenticeship Targets	Legal obligation under the Education (Supply of Information about School Workforce) (England) Regulations 2007 to provide the DfE with information on members of the school workforce, Gender Pay Gap Reporting Regulations, Trade Union Act 2016 and Public Sector Apprenticeship Targets Regulations 2017
To prevent fraud	Legitimate interest to protect public funds
To monitor your use of our information and communication systems to ensure compliance with our IT policies.	Fulfil the employment of contract with you.
To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.	Legitimate interest to protect staff and pupils and school data.
Equal opportunities monitoring. For example we will use it to monitor, analyse and report on equalities data and use it to assist us to take action to prevent inequalities. It may also be used to develop our policies and processes to take account of the diverse needs of our employees.	Article 6: Legal obligation under the Equalities Act 2010 (Specific Duties) Regulations for Public sector employers to demonstrate compliance with the duty to eliminate discrimination and advance equality of opportunity and

	<p>comply</p> <p>Article 9 Special Category of data Processing is necessary for reasons of substantial public interest</p>
<p>Provide references on request for current or former employees</p>	<p>Teachers: comply with a legal obligation under the School Staffing Regulations (England) 2009 to pass on information to prospective employers about teachers and Headteachers, who have been subject to capability procedures. Therefore, when requesting a reference the school must ask the referee whether that teacher has been subject, in the last two years, to their school's capability procedure. Also to comply with Keeping Children Safe in Education statutory document</p>
<p>Respond to and defend against legal claims</p>	<p>To fulfil the contract of employment with you</p>
<p>Respond to employment queries as and when they arise</p>	<p>To fulfil the contract of employment with you</p>

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

[NCC and Diversa or just Diversa? (as administrators of LGPS and TPS) only make automated decisions about you where they are required to by law, to fulfil their employer obligations under pensions auto-enrolment, where you will be automatically enrolled in the pension scheme based on your age and earnings. Enrolment is reviewed every 3 years and employees may be put back into a scheme at this stage. You may notify us if you do not wish to be a member of the pension scheme.]

[We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.]

Data sharing

We may have to share your data with third parties, including third-party organisations who provide services to employees on our behalf.

We require third parties to respect the security of your data and to treat it in accordance with the law.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. [The following activities are carried out by third-party service providers: [HR, recruitment, contracts, casework, payroll, safeguarding, the provision of benefits, the provision of occupational health services, DBS checking, requesting pre-employment references, pensions, payroll, pension administration and IT services]. The Trust may also share your data with third parties in the context of a TUPE transfer. The following third-party service providers process personal information about you for the following purposes:

[Specify any other third parties with whom data is shared and the activities they carry out. Example given below for Educator Solutions HR Services.]

Educator Solutions HR Services

The Trust shares your data with Educator Solutions HR Services in order to ensure all HR obligations are met. This includes, Educator Solutions processing your data to support the school with:

- running recruitment processes;
- maintaining accurate and up-to-date employment records and contact details and records of employee contractual and statutory rights;
- disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- employee performance and related processes and workforce management activities;
- staffing adjustments and redeployment support
- absence and absence management cases, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- obtaining occupational health advice, to ensure that the school complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- keeping an accurate record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the organisation complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- reporting on apprentices employed and apprenticeships being undertaken to fulfil legal obligations under the 'Public Sector Apprenticeship Targets Regulations 2017' and local authority reporting requirements.
- ensuring effective general HR and business administration;
- providing references on request for current or former employees;
- responding to and defend against legal claims;
- responding to employment queries as and when they arise and;
- maintaining and promoting equality in the workplace.
- meeting their safeguarding obligations in terms of pre-employment checks and support with related cases if and when they arise in school.

Other third parties

See below for other third parties you may use (not exhaustive). Examples have been given to some to show what the shared personal data is used for:

- The local authority - to meet our legal obligations to share certain information with it, such as safeguarding concerns; school workforce data under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and [maintained schools only] information about headteacher performance and staff dismissals
- The Department for Education - 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.
- Your family or representatives
- Educators and examining bodies
- Ofsted
- Payroll - we share personal data with our payroll provider to ensure you are paid correctly and you receive the correct statutory payments when necessary e.g. statutory sick pay.
- HMRC - tax, NI and statutory payments and deductions
- Educator Solutions Finance
- Atlantic Data - DBS check processing
- Learning hub - e-learning courses
- Norfolk Rewards - employee benefits platform
- Pension providers
- Benefit providers - e.g. childcare vouchers and salary sacrifice schemes
- Central and local government
- Survey and research organisations
- Trade unions and associations
- PAMS - occupational health provider
- IPRS Musculoskeletal rehabilitation services
- Security organisations
- Health and social welfare organisations
- ~~OSHENS – workplace incident reporting systems~~
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies
- Employment and recruitment agencies
- IT provider

How secure is my information with third-party service providers and other entities in our Trust?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When might you share my personal information with other entities in the group?

We will share your personal information with other entities in our group [as part of our regular reporting activities on **Trust** performance, in the context of a reorganisation or restructuring exercise, for system maintenance support and hosting of data [**recruitment across the Trust.**]

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible transfer/conversion to academy. We may also need to share your personal information with a regulator (e.g. Ofsted) or to otherwise comply with the law.

Transferring information outside the EU

Diversa MAT will not transfer your data to countries outside the European Economic Area.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available in the GDPR folder in your public folder under staff only.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. **[Details of these measures may be obtained from [POSITION].] ??????**

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. **[Details of retention periods for different aspects of your personal information are available in our Records Management Policy which is available as an appendix to the GDPR policy.]**

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with **Records Management Policy**.

Please note as a result of the Goddard Inquiry all data on persons who work with children should be retained until further notice.

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. Information on how to make a subject access request (SAR) can be found here [\[insert link\]](#). You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
- **Right to withdraw consent:** In the limited circumstances where you may have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.
To withdraw your consent, please contact **[POSITION]**. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact **[POSITION]** in writing.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Data Protection Officer

[We have appointed/access to a [data protection officer (DPO)] to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO **[Name and contact information]**. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.]

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact [Position/contact details].

I, _____ (employee/worker/contractor name), acknowledge that on _____ (date), I received a copy of [School]'s Privacy Notice for employees and workers and that I have read and understood it.

Signature

.....

Name

.....

30.4.18 draft