

Privacy Notice for Staff, Governors and Volunteers

Under data protection law, individuals have a right to be informed about how Windsor Learning Partnership use any personal data that they hold about them. Windsor Learning Partnership complies with this right by providing 'Privacy Notices' (sometimes called 'fair processing notices') to individuals where they are processing their personal data.

This Privacy Notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our academies.

Windsor Learning Partnership (the Trust) are the 'data controller' for the purposes of data protection law. The Trust has delegated responsibility to the Headteacher/Executive Headteacher in each academy for ensuring compliance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018).

The Trust's DPO is: Data Protection Officer, Senior Information Governance Officer, Law and Governance Service, Royal Borough of Windsor & Maidenhead, St. Ives Road, Maidenhead, SL6 1RF, Tel: 01628 796675.

The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our academies. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- name and contact details
- date of birth, marital status and gender
- next of kin and emergency contact numbers
- salary, annual leave, pension and benefits information
- bank account details, payroll records, National Insurance number and tax status information
- recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- qualifications and employment records, including work history, job titles, working hours, training records, professional memberships, and childcare disqualification declaration
- performance information
- outcomes of any disciplinary and/or grievance procedures
- absence data
- copy of driving licence, car details including registration number
- photographs and videos

- CCTV footage where used
- data about your use of the academy's information and communications system

We may also collect, store and use information about you that falls into 'special categories' of more sensitive personal data. This includes information about (where applicable):

- race, ethnicity, religious beliefs, sexual orientation and political opinions
- trade union membership
- health, including any medical conditions, and sickness records
- genetic and biometric data

Why we use this data

The purpose of processing this data is to help us run the academies, including to:

- enable you to be paid
- facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- support effective performance management
- inform our recruitment and retention policies
- allow better financial modelling and planning
- enable ethnicity and disability monitoring
- improve the management of workforce data across the sector
- support the work of the School Teachers' Review Body

Our lawful basis for using the data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- fulfill a contract we have entered into with you
- comply with a legal obligation
- carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- you have given us consent to use it in a certain way
- we need to protect your vital interests (or someone else's interests)

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the Trust's use of your data.

Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

We may also obtain information from tax and regulatory authorities such as HMRC, previous employers, your trade union, the Disclosure & Barring Service, other staff members, pupils or their parents, and publicly available resources including on-line services. In addition we may obtain information from automated monitoring of our websites and other technical systems such as our computer networks and systems, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, intranet and internet facilities, telephones, voicemail and mobile phone records.

How we store this data

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and only used for purposes directly relevant to your employment.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with the Trust's Records Retention Policy.

Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- our local authority; to meet our legal obligations to share certain information with it, such as safeguarding concerns
- the Department for Education
- Windsor Learning Partnership Academies
- your family or representatives
- educators and examining bodies
- our regulator [Ofsted]
- suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll
- financial organisations

- central and local government
- our auditors
- survey and research organisations
- trade unions and associations
- health authorities
- security organisations
- health and social welfare organisations
- professional advisers and consultants
- charities and voluntary organisations
- police forces, courts, tribunals
- professional bodies
- employment and recruitment agencies

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Your rights

How to access personal information we hold about you

Individuals have a right to make a '**Subject Access Request**' to gain access to personal information that the Trust holds about them.

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please contact our central team at Windsor Learning Partnership or email wlp@windsorgirls.net

Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- object to the use of your personal data if it would cause, or is causing, damage or distress
- prevent your data being used to send direct marketing
- object to the use of your personal data for decisions being taken by automated means

- in certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing

To exercise any of these rights, please contact our Data Protection Officer.

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our Data Protection Officer, please see the contact details below. Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Telephone number: 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this Privacy Notice, please contact our Chief Operating Officer, Windsor Learning Partnership, c/o Windsor Girls' School, Imperial Road, Windsor, SL4 3RT.