



## **Staff Privacy Notice**

### **Introduction**

As an employer, the Greater Manchester Education Trust (GMET) is required to process personal data about you in order to meet its contractual, statutory and administrative obligations. This will include data that we obtain from you directly and data about you that we obtain from other people and organisations. The Trust is committed to ensuring that the personal data of our employees is handled in accordance with the UK General Data Protection Legislation and other relevant legislation.

This privacy notice outlines the type of data that we collect about you, why we need to collect it and how it will be processed. It applies to all employees of the Trust including teachers, support staff and any temporary or agency workers; the information we collect will differ depending upon your role and personal circumstances.

The Greater Manchester Education Trust (GMET) is the data controller for the information that we collect about you which means we make decisions on how that data is processed.

The Trust is the Data Controller for the personal data that we process about you, this means that we are responsible for and make decisions on how your data is processed.

### **The categories of school workforce information that we collect, process, hold and share include:**

#### **Information related to your employment such as:**

- Personal data such as name, employee/teacher number, national insurance number.
- Contact details including postal address, telephone number and personal email.
- Next of kin, emergency contacts and their contact details.
- A copy of photographic or other identification such as a passport or birth certificate as part of the checking for 'Right to Work'
- Special categories of data including characteristics information such as gender, ethnicity.
- Employment history, education history and qualifications (and, where relevant subjects taught).
- Security clearance checks and any criminal convictions you declare to us.
- Results of social media checks

#### **Information related to your salary and pension such as:**

- Contract information such as job role and your employment contract including start and leave dates, hours worked, salary information and any requests for flexible working.



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- Details of any amendments to your employment contract, any overtime, expenses and other payments claimed.
- Details of any leave including sick / absences, holidays, and special leave. This also includes details of Maternity, Paternity, Shared Parental and Adoption leave.
- Pension details including membership of both state and occupational pension schemes; includes past and present schemes.
- Your bank account details for, payroll records and tax status data.
- Whether you are a member of a Trade Union for the purpose of deductions from salary.

### **Information related to your performance such as:**

- Information related to your performance at work including reviews, promotions, and training / development needs.
- Details of any grievances, investigations, hearings and disciplinaries that you may be part of or witness to.
- Whistleblowing concerns raised by you or to which you may be a party or witness to.

### **Information related to safeguarding, data protection and filtering and monitoring (in relation to safeguarding) such as:**

- Information related to your access to school systems and permissions.
- Information derived from Internet filtering.
- Information derived from monitoring computer usage.
- Photos and CCTV images.

### **Information related to your health and well-being:**

- Health and well-being information either declared by you or obtained from health checks including eye examinations, occupational health referrals, sick leave forms, health management questionnaires and fit notes from your GP or hospital.
- Accident records should you have an accident at work.
- Details of any access needs
- Information you may have provided regarding protected characteristics including religious beliefs, disability status, gender identification and other protected characteristics.



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### **How we get the personal information and why we have it**

Most of the personal information we process is provided directly by you. Some information may be provided by colleagues such as your appraiser or line manager as part of the school reporting procedures. Some of the information is collected in school automatically such as signing in times, computer logons and CCTV capture.

We also collect your information indirectly from third parties including previous employers, local authorities, and government bodies such as HMRC.

We use your personal information:

- To meet our legal and statutory obligations
- To fulfil our employment contract with you
- To provide you with access to school systems and services necessary to fulfil your role
- To manage our Human Resources process
- To process your salary, pension and other employee related benefits
- To administer contractual leave entitlements including holidays and maternity / paternity leave
- To assess your performance, conduct reviews and meet training requirements for your role
- To address any employment related disputes
- For the security of the school community including pupils, staff members, school systems and premises
- To ensure the health and well-being of those in the school community

Whilst the majority of information that you provide is mandatory, some is provided to us on a voluntary basis. We will inform you whether you are required to provide certain information or if there is a choice not to.

### **Sharing your personal data**

In some circumstances, we are legally obliged to share your personal data with authorities and other third parties. The school routinely shares staff data with the following organisations:

- The Local Authority: we are required to share information about our workforce.
- The Department for Education: we are required to share information with the DfE for workforce monitoring and evaluation.
- HMRC: as an employer we are required to share your personal information for tax and employment purposes.



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We share your data with organisations (data processors) that provide services necessary to the functioning of the school such as IT, HR, and Payroll providers. We may also share your data with software providers of educational resources which help us to deliver our core services such as Evolve, Edulink One and ClassCharts.

The school remains the data controller for any data shared and our third-party providers cannot do anything with your data without our instruction. Agreements and compliance checks are in place to ensure the security of personal data processed.

Please find below a list of third parties that we may routinely share staff data with:

- Our Local Authority – to meet our legal obligations
- The Department for Education – to meet our legal obligations
- Your family and representatives – should there be an emergency
- Educators and examining bodies – to ensure we adhere to examining regulations
- Ofsted – during the course of a school inspection
- Suppliers and service providers such as HR, Payroll, Pensions and IT – to enable them to provide the service we have contracted them to
- Central and local government – for workforce analysis purposes
- Auditors – to ensure compliance with our legal obligations
- Health Authorities including the NHS and other Occupational Health Providers – to ensure the wellbeing of staff and fulfil our responsibilities as an employer
- Security Organisations – to create a secure workplace for staff, pupils and other members of the school community
- Professional advisers and consultants – to develop and help provide the best service possible to the public
- Charities and voluntary organisations – to enable them to fulfil a service to us
- Police forces, courts and tribunals – to comply with our legal obligations
- Future employers and recruitment agencies – to provide references
- Online learning platforms such as Microsoft 365, Google for Education, Edulink One, Educake, Seneca Learning etc. – to enable you to access school systems (for the full list please see the Trust Central Software List <https://gmetrust.org/legal/privacy>)

## **Transferring data outside of the UK**

Where we transfer personal data to a country or territory outside of the UK, we will do so in accordance with data protection laws.



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### **Lawful bases for processing**

Under the UK General Data Protection Regulation, we rely on the following lawful bases for processing your personal data:

- You have provided consent
- We have a contractual obligation
- We have a legal obligation
- We have a vital interest
- We need it to perform a public task

### **Special category data**

The school is required by law to treat certain categories of personal data with more care than usual, this is referred to as special category data and concerns personal information that is sensitive in nature. The UK-GDPR defines special category data as personal data which reveals:

- Racial and ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade Union membership
- Genetic data
- Biometric data (if used for identification purposes)
- Health data
- Sex life and sexual orientation

We are required by law to apply an additional lawful basis when processing special category data, here are the lawful basis we rely upon:

- You have given explicit consent to the processing
- It is necessary to your / our rights and obligations concerning employment, social security and social protection law
- It is necessary to protect your vital interests or that of another natural person in situations where you are physically or legally incapable of giving consent.
- It is necessary in the establishment, exercise, or defence of legal claims.
- It is necessary for reasons of substantial public interest
- It is necessary for health and social care
- It is necessary for public health

In situations where we have used consent as the sole lawful basis for processing your data, your consent can be withdrawn at any time by contacting the school business manager.



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### **How we store your personal data and how long we hold it for**

Most of the personal data we process is held securely in SIMS. Any personal data that we hold in paper format is securely stored on the school site and can only be accessed by the headteacher or HR staff.

Sometimes, our third-party data processors store your personal data on their servers to fulfil their services to us. In such cases, the school will ensure that all data is securely stored in line with the UK-GDPR and our own technical security standards.

In line with the UK-GDPR, we will only process your personal data for as long as necessary to fulfil the purposes outlined above. By law, we are required to retain the information relating to a permanent member of staff for 7 years after the end of their contract, but there are different time limits for temporary staff and job applicants. Our records management policy and retention schedule provides a full outline of how long we are likely to process your personal data. Please contact the school office to obtain a copy.

### **Your data protection rights**

Under the UK-GDPR, you have a right to access the personal data that we hold about you through a subject access request (SAR). If you make a SAR and we do process the data you have requested access to, we will:

- Give you a description of it
- Explain why we are processing it and how long we will hold it
- Explain where we collected the data if not from you
- Outline if the data has been or will be shared with any other parties
- Inform you if any automated decision making has been applied to the data and provide any consequences of this
- Provide you with a copy of the data in an intelligible form.

Along with the right to access your personal data, you also have the following rights:

- The right to ask us to rectify any personal information you feel is inaccurate or incomplete
- The right to ask us to erase your personal data in certain circumstances
- The right to ask us to restrict the processing of your personal data in circumstances
- The right to object to the processing of your personal data in certain circumstances
- The right to ask us to transfer the personal data you provided to another organisation in certain circumstances.

You will not be required to pay any fee for exercising your rights; if you make a request the school will respond within one calendar month. Please contact us if you wish to make a request.



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### **Complaints**

If you have any concerns at all about how we process your personal data, please contact the School Business Manager in the first instance so that we can help resolve any issues.

If you would like to discuss anything in this privacy notice, please contact:  
Kate Wragg: Trust Data Protection Lead at [cwragg@gmetrust.org](mailto:cwragg@gmetrust.org)

If an individual wishes to pursue concerns further, please contact our Data Protection Officer: Danielle Eadie, Data Protection Consultant, RADCaT Ltd, Registered Office: 6 Seven Stars Road, Wigan, WN3 5AT. Email: [danielle.eadie@radcat.co.uk](mailto:danielle.eadie@radcat.co.uk)

You can also complain to the Information Commissioners Office (ICO) if you are unhappy with how we have used your data:

Information Commissioners Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline: 0303 123 1113

Website: <https://www.ico.org.uk>