

Positive Regard TSA Privacy Notice – Workforce

1. Scope

- 1.1. Under data protection law, individuals have a right to be informed about how the Teaching School uses any personal data that we hold about them. We comply with this right by providing privacy notices to individuals where we are processing their personal data. This privacy notice explains how we collect and use personal data about our workforce, in line with the requirements of GDPR (General Data Protection Regulation).

2. Responsibilities

- 2.1. The Trust Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to Wellspring Academy Trust and its Academies collecting/processing their personal data.
- 2.2. Positive Regard TSA who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and where necessary their consent to the processing of their data is secured.
- 2.3. The personal data collected is essential, in order for the Trust and its Academies to fulfil its official functions and meet legal requirements.

3. Privacy Notice

3.1. Who are we?

Positive Regard Teaching School Alliance operates across Yorkshire, Humber and Lincolnshire. Our group encompasses provision across Primary, Secondary, Alternative and Special sector areas.

3.2. Key Contact?

Data Protection Officer: Jonny Wathen (On behalf of Positive Regard TSA)
Email: privacy@wellspringacademies.org.uk
Telephone: 01226 720758

3.3. The categories of personal data that we collect, process, hold and share includes:

- Personal information (such as name, national insurance number)
- Characteristics information (such as gender, age, ethnic group)
- Absence information (such as number of absences and reasons)
- Qualifications (and, where relevant, subjects taught)

Personal data type	Source (where Positive Regard Teaching School Alliance obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources):
<ul style="list-style-type: none"> • Contact details • Date of birth, marital status and gender • Next of kin and emergency contact numbers • Recruitment information, including copies of UCAS applications, references and other information included in an application form as part of the application process • Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships • Performance information • Outcomes of any disciplinary and/or grievance procedures • Absence data • Copy of driving licence and passport • Photographs • CCTV footage • Data about your use of the school’s information and communications system • Video footage / Photos from training events • Assessment 	<p>UCAS applications.</p> <p>References from referees provided by staff</p> <p>Sheffield Hallam University</p>
Special categories of sensitive personal data	
<ul style="list-style-type: none"> • Race, ethnicity, religious beliefs, sexual orientation and political opinions • Health, including any medical conditions, and sickness records 	

3.4. The personal data we collect will be used for the following purposes:

- To manage interview process
- To manage employment relations
- To provide support, training and development
- To assess the quality of our services
- To keep children safe and protect welfare (food allergies, or emergency contact details)
- To meet the statutory duties placed upon us for DfE data collections
- To carry out research
- To comply with the law regarding data sharing
- To manage compliments and complaints

3.5. Data sharing

We sometimes need to share the personal information we process with the individual themselves, and also with other organisations. Where this is necessary we are required to comply with all aspects of the GDPR. What follows is a description of the types of organisations we may need to share some of the personal information we process with for one or more reasons.

Where necessary or required we share information with:

- Local authorities – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- The Department for Education
- Sheffield Hallam University
- Placement Schools and mentors
- Regulators (such as Ofsted)
- Family, associates and representatives of the person whose personal data we are processing
- Professional advisers
- Current, past or prospective employers
- Persons making an enquiry or complaint
- Security organisations
- Information System Providers for assessment purposes
- Employment or recruitment agencies

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

3.6. The lawful basis for processing personal data we rely on are:

Positive Regard TSA only collects and uses employee personal data when the law allows. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest

Less commonly, we may also process employee personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use employee personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

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

3.7. Storage and Retention of Data

Positive Regard Teaching School Alliance will process personal data for whilst you are a school direct trainee and will store the personal data for 3 months if unsuccessful. Please refer to the Data Protection & Storage Policy for data retention periods.

3.8. Your rights as a data subject

Individuals have a right to make a subject access request to gain access to personal information that the Trust holds about them.

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organization.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Wellspring Academy Trust or its Academies refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complained as outlined in clause 3.5 below.

All of the above requests will be forwarded on should there be a third party involved in the processing of your data.

If you make a subject access request, and if we do hold information about you or your child, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long it will be kept for
- Explain where we got it from, if not you or your child
- Tell you who it has been, or will be, shared with
- Give you a copy of the information in an intelligible form
- Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

3.9. Other rights

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

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)

- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

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

3.10. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Positive Regard TSA, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory Teaching School data protection representatives Data Protection Officer.

The details for each of these contacts are:

	Supervisory authority contact details	DPO contact details
Contact Name:	https://ico.org.uk/concerns	Jonny Wathen
Address line 1:		Wellspring Academy Trust
Address line 2:		Digital Media Centre
Address line 3:		County Way
Address line 4:		Barnsley
Address line 5:		S70 2JW
Email:		privacy@wellspringacademies.org.uk
Telephone:	0303 123 1113	01226 720742