Privacy Notice for Employees of the Trust or Applying to Join the Trust

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Please delete as applicable

All staff / volunteers	**Y**
Governing Body	**N**
Parents on request	**N**
Published on School website	**Y**
ISI requirement to be available on request	**N**
ISI requirement to be on School website	**N**
Parent Portal	**N**
Staff Hub	**N**
ISI Portal	**N**
Limited Internal Use Only (state recipients)	

This policy is considered a 'live' document and will be updated as statutory guidance is released

Bede's is committed to safeguarding and promoting the welfare of children and young people, and expects all staff and volunteers to share this commitment.

Vision, Mission and Values

Our Vision
Where every child finds joy in their pursuit of brilliance

Our Mission
We continue to craft a more joyful education.

- Cultivating a vibrant learning experience, motivating us to pursue our individual best.
- Providing a festival of opportunity, enabling us to discover new passions and develop new talents.
- Building a kind-hearted community, inspiring us to enhance the lives of others.

Our Values
Be Compassionate
Because a caring community fosters belonging.
We expect our community to show kindness to people of all ages, genders and ethnicities, maintaining campuses where every person feels joyful and energised.
Be Courageous
Because fortune favours the brave.
We challenge our community to stand up for what is right, providing them with a safe environment where they can take bold action in pursuit of brilliance.
Be Curious
Because wisdom can be found off the beaten track.
We encourage our community to discover unlikely passions and hidden niches, releasing them into a wealth of opportunities inside and outside the classroom.
Be Conscientious
Because dedication is a spearhead of success.
We ask our community to throw themselves wholeheartedly into every endeavour, taking responsibility for their journey and inspiring others to do the same.

Policy Principles/Aims:

This notice deals with two sources of data, that obtained directly from you and that obtained from others or elsewhere.

Statutory Guidance:

Associated Trust Policies:

Overview Privacy Notice

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1. Introduction

I. In the course of your work undertaken for the Trust, we will collect, use and hold ("process") personal data relating to you as a member of our staff or wider Trust team, regardless of your employment status. This makes the Trust a data controller of your personal information, and this Privacy Notice sets out how we will use that information and what your rights are.

II. This notice deals with two sources of data: that obtained directly from you and that obtained from others or elsewhere.

III. This privacy notice should be read in conjunction with the 'Overview Privacy Notice' and the introductory paragraphs of the 'Privacy Notices' section on the Trust's website.

IV. This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly and will thereafter be available on both Mybedes and the Trust website.

2. Who this policy applies to

I. This document applies to academic and other staff, contractors, visiting music teachers and other peripatetic workers, casual workers, temps, and volunteers who may be employed or engaged by the Trust to work for it in any capacity, as well as prospective applicants for roles.

II. Please note that any references to "employment", "staff" etc. in this Notice are not intended to imply or confer any employment rights on you if you are a contractor, non-employed worker, or job applicant if the Notice is relevant to how we process your personal data.

III. This notice is not aimed at pupils, or parents of pupils (whether current, past or prospective) or other members of the public. This information may be found in the Trust's Privacy Notice, which provides further details about how such personal data will be used by the Trust. Nor does it inform staff how to handle the personal data of the same, which is covered by the Trust's Data Protection Policy.

3. About this policy

I. This Staff Privacy Notice explains how the Trust collects, uses and shares (or "processes") personal data of staff, and your rights in relation to the personal data we hold.

II. This Privacy Notice also applies in addition to the Trust's other relevant terms and conditions and policies that may (depending on your role and status) apply to you, including:

a) Any contract between the Trust and its staff, such as the terms and conditions of employment, and any applicable staff handbook e.g. the Staff Code of Conduct.
b) The Trust's CCTV policy;
c) The Trust's Retention of Records policy;
d) The Trust's safeguarding, pastoral, anti-bullying, or health and safety policies, including as to how concerns or incidents are reported or recorded (both by and about staff); and
e) The Trust's IT policies, including its Acceptable Use policy and E-Safety policy.

III. Please note that your contract with or engagement by the Trust, including any document or policy forming a part of your contractual obligations to the Trust, may in particular be relevant to (and supplement the information in) this Staff Privacy Notice, to the extent that it will contain details of obligations or rights of the Trust under contract with you which may require the use of your personal data. However, this Staff Privacy Notice is the primary document in terms of how we notify you about the use of your personal data by the Trust.

IV. This Staff Privacy Notice also applies alongside any other information the Trust may provide about particular uses of personal data, for example when collecting data via an online or paper form.

4. How we collect your information

I. We may collect your personal data in a number of ways, for example:

a) From the information you provide to us before making a job application, for example when you come for an interview;
b) When you submit a formal application to work for us, and provide your personal data in application forms and covering letters, etc.; and
c) From third parties, for example the Trust's Disclosure and Barring Service (DBS) Atlantic Data and references (including your previous or current employers or Trust), or (if you are a contractor or a substitute) your own employer or agent, in order to verify details about you and/or your application to work for us.

II. More generally, during the course of your employment with us, as a member of staff, we will collect data from or about you, including;

a) When you provide or update your contact details;
b) When you or another member of staff completes paperwork regarding your performance appraisals;
c) In the course of fulfilling your employment (or equivalent) duties more generally, including by filling reports, note taking, or sending emails on Trust systems;
d) In various other ways as you interact with us during your time as a member of staff, and afterwards, where relevant, for the various purposes set out below.

5. The types of information we collect

I. We may collect the following types of personal data about you (and your family members and 'next of kin', where relevant):

5. 1 Contact and communications information, including:

a) Your contact details (including email address(es), telephone numbers and postal address(es);
b) Contact details (through various means, as above) for your family members and 'next of kin', in which case you confirm that you have the right to pass this information to us for use by us in accordance with this Privacy Notice;

5. 2 Records of communications and interactions we have had with you;

a) Biological, educational and social information, including:
b) Your name, title, gender, nationality and date of birth;
c) Your image and likeness, including as captured in photographs taken for work purposes;
d) Details of your education and references from your institutions of study;
e) Lifestyle information and social circumstances;
f) Your interests and extra-curricular activities;

5.3 Financial information, including:

a) Your bank account number(s), name(s) and sort code(s) (used for paying your salary or invoice and processing other payments);
b) Your tax status (including residence status);
c) Information related to your pensions, national insurance, or employee benefit schemes;

5.4 Work related information, including:

a) Details of your work history and references from your previous employer(s);
b) Your personal data captured in the work product(s), notes and correspondence you create while employed by or otherwise engaged to work for the Trust;
c) Details of your professional activities and interests;
d) Your involvement with the membership of sector bodies and professional associations;
e) Information about your employment and professional life after leaving the Trust, where relevant (for example, where you have asked us to keep in touch with you);
f) And any other information relevant to your employment or other engagement to work for the Trust.

5.5 Special Category data

I. Where this is necessary for your employment or other engagement to work for us, we may also collect special categories of data, and information about criminal convictions and offences, including:

a) Information revealing your racial or ethnic origin;
b) Trade union membership, where applicable;
c) Information concerning your health and medical conditions (for example, where required to monitor and record sickness absences, dietary needs, or to make reasonable adjustments to your working conditions or environment);
d) Information concerning your sexual life or orientation (for example, where this is necessary for due diligence purposes, or compliance with our legal and regulatory obligations);

II. However, this will only be undertaken where and to the extent it is necessary for a lawful purpose in connection with your employment or other engagement to work for the Trust.

6. The bases for processing your personal data, how that data is used and whom it is shared with

6. 1 Entering into or fulfilling, our contract with you

I. We process your personal data because it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, such as a contract of employment or other engagement with us. In this respect, depending on your role and status, we are likely to use your personal data for the following purposes:

a) Administering job applications and, where relevant, offering you a role with us;
b) Carrying out due diligence checks on you, whether during the application process for a role with us or during your engagement with us, including by checking references in relation to your education and your employment history;
c) Once you are employed or engaged by us in any capacity, for the performance of the contract of employment (or other agreement) between you and us;
d) To pay you and to administer benefits (including pensions) in connection with your employment or other engagement with us;
e) Monitoring your attendance and your performance in your work, including in performance appraisals;
f) Promoting the Trust to prospective parents and others, including by publishing the work product(s) you create while employed by or otherwise engaged to work for the Trust;
g) For disciplinary purposes, including conducting investigations where required;
h) For other administrative purposes, for example to update you about changes to your terms and conditions of employment or engagement, or changes to your pension arrangements;
i) For internal record-keeping, including the management of any staff feedback or complaints and incident reporting; and
j) For any other reason or purpose set out in your employment or other contract with us.

6. 2 Legitimate Interests

I. We process your personal data because it is necessary for our (or sometimes a third party's) legitimate interests. Our "legitimate interests" include our interests in running the Trust in a professional, sustainable manner, in accordance with all relevant ethical, educational, charitable, legal and regulatory duties and requirements (whether or not connected directly to data protection law). In this respect, depending on our role and status, we are likely to use your personal data for the following:

a) Providing you with information about us and what it is like to work for us (where you have asked for this, most obviously before you have made a formal application to work for us);
b) For security purposes, including by operating security cameras in various locations on the Trust's premises;
c) To enable relevant authorities to monitor the Trust's performance and to intervene or assist with incidents as appropriate;
d) To provide education services to pupils;
e) To safeguard pupils' welfare and provide appropriate pastoral care;
f) To carry out or cooperate with any Trust or external complaints, disciplinary or investigatory process;
g) For the purposes of management planning and forecasting, research and statistical analysis;
h) In connection with organising events and social engagements for staff;
i) Making travel arrangements on your behalf, where required;
j) Contacting you or your family members and 'next of kin' for business continuity purposes, to confirm your absence from work;

k) Publishing your image and likeness in connection with your employment or engagement with us;
l) To monitor (as appropriate) use of the Trust's IT and communications systems in accordance with the Trust's Acceptable Use Policy and government guidance such as KCSIE.

6. 3 Legal Obligations

I. We also process your personal data for our compliance with our legal obligations, notably those in connection with employment, charity/company law, tax law and accounting, and child welfare. In this respect, depending on your role and status, we are likely to use your personal data for the following:

a) To meet our legal obligations (for example, relating to child welfare, social protection, diversity, equality, and gender pay gap monitoring, employment, and health and safety);
b) For tax and accounting purposes, including transferring personal data to HM Revenue and Customs to ensure that you have paid appropriate amounts of tax, and in respect of any Gift Aid claims, where relevant;
c) For the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

6. 4 Special categories of data

I. Depending on your role and status, we process special categories of personal data (such as data concerning health, religious beliefs, racial or ethnic origin, sexual orientation or union membership) or criminal convictions and allegations for the reasons set out below.

a) We will process this data on the basis that such processing is necessary to carry out obligations and exercise rights (both yours and ours) in relation to your employment or engagement.
b) In particular, we process the following types of special category data for the following reasons:
    a. Your physical or mental health or condition(s) in order to record sick leave and take decisions about your fitness for work, or (in emergencies) act on any medical needs you may have;
    b. Recording your racial or ethnic origin in order to monitor our compliance with equal opportunities legislation;
    c. Trade union membership, in connection with your rights as an employee, agent or contractor and our obligations as an employer or engager of your services;
    d. Categories of your personal data which are relevant to investigating complaints made by you or others, for example concerning discrimination, bullying or harassment;
    e. Data about any criminal convictions or offences committed by you, for example when conducting criminal background checks with the DBS, or where it is necessary to record or report an allegation (including to police or other authorities, with or without reference to you);

II. We will process special categories of personal data for lawful reasons only, including because:

a) You have given us your explicit consent to do so, in circumstances where consent is appropriate;

b) It is necessary to protect your or another person's vital interests, for example, if you have a life-threatening accident or illness in the workplace and we have to process your personal data in order to ensure you receive appropriate medical attention;
c) It is considered in the public interest, including the safeguarding of children or vulnerable people, or as part of a process designed to protect others from malpractice, incompetence or unfitness in a role (or establish the truth of any such allegations) this will be carried out as stipulated in the Staff Code of Conduct and the Disciplinary Policy;
d) It is necessary for the establishment, exercise or defence of legal claims, such as where any person has brought a claim or serious complaint against us or you.

6. 5 Sharing your information with others

I. For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. We may disclose limited personal data (including in limited cases special category or criminal data) to a variety of recipients including:

a) Other employees, agents and contractors (e.g. third parties processing data on our behalf as part of administering payroll services, the provision of benefits including pensions, IT etc. – although this is not sharing your data in a legal sense, as these are considered data processors on our behalf). For example: WCBS, CIPHR and Pass.
b) DBS and other relevant authorities such as Atlantic Data and agencies such as the Department for Education, NCTL, the ICO, Charity Commission and the local authority;
c) External auditors or inspectors;
d) Our advisers where it is necessary for us to obtain their advice or assistance, including insurers, lawyers, accountants, or other external consultants;
e) Third parties and their advisers in the unlikely event that those third parties are acquiring or considering acquiring all or part of our Trust, or we are reconstituting or setting up some form of joint working or partnership arrangement in the UK or abroad;
f) When the Trust is legally required to do so (by a court order, government body, law enforcement agency or other authority or competent jurisdiction), for example HM Revenue and Customs or police.
g) With Quintin Medical Centre which is the Trust's healthcare service provider
h) To enable the everyday running of the Trust, for example: Microsoft, Google, iSAMS, WCBS: PASS, CIPHR, The Parent Portal, Trust IT software providers.
i) For pastoral reasons: MyConcern
j) To keep in contact with staff for alumni purposes: Raisers Edge by Blackbaud
k) For UCAS data: AS Tracking, unifrog
l) The Trust's photographers: Gillman and Soame

II. We may also share information about you with other employers in the form of a reference, where we consider it appropriate, or if we are required to do so in compliance with our legal obligations. References given or received in confidence may not be accessible under your UK GDPR rights.

III. It is not necessary for data to be shared with other countries. The exception to this will be international trips that the Trust organises, should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it be required.

7. How long your information is kept?

I. Personal data relating to unsuccessful job applicants is deleted within 6 months of the end of the application process, expect where we have notified you we intend to keep it for longer (and you have not objected).

II. Subject to any other notices that we may provide to you, we may retain your personal data for a period of seven years after your contract has expired or been terminated.

III. However, some information may be retained for longer than this, for example incident reports and safeguarding files, in accordance with specific legal requirements. Please see refer to our Retention of Records policy for further information.

8. Your rights

I. Please see the Trust's Overview Privacy Notice which details in depth the rights of all employees of the Trust or those applying to join the Trust. These rights are the same as if you were any member for the public. You can find out more about your rights under applicable data protection legislation from the Information Commissioner's Office website available at www.ico.org.uk.

II. You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.

III. You can complain at any time about how the Trust has handled your data. The Information Commissioner is available through the ICO helpline at 0303 123 1113. It should be noted that the ICO recommends that steps are taken to resolve the matter directly with the Trust prior to involving the regulator, please refer to the Trust's Overview Privacy Notice for further details.

IV. We will obtain the data the Trust requires from you, should we need data from other sources we will contact you first.

V. We see the provision of personal data as necessary to properly employ you at the Trust and to administer, and for the Trust to fulfil its obligations under the contract once you are an employee here.

VI. There is no automated decision making or profiling involved in this data stream into and through the Trust.