



## **BPET Privacy Notice – Staff**

Signed:	
Chair of Trust Board:	Claire Delaney
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## **1. Introduction**

- 1.1 Under data protection law, individuals have a right to be informed about how the Trust and its Academies use any personal data that is held about them. We, the Bellevue Place Education Trust, comply with this right by providing Privacy Notices to individuals where we are processing their personal data.

## **2. Document Purpose**

- 2.1 The purpose of this Privacy Notice is to explain how the Trust collects, stores and uses personal data about individuals we employ, or otherwise engage, to work at our Academies and in our Head Office.

## **3. Definitions**

- 3.1 **Trust** means all Academies within the Bellevue Place Education Trust, as well as Head Office and central services operations.
- 3.2 **Executive Leadership Team** means the Chief Executive Officer (“CEO”) and the direct line management reports of the CEO (the “Directors”).

## **4. Privacy Notice - Staff**

### **4.1 Data Controller and Processors**

- 4.1.1 BPET is the Data Controller for the purposes of data protection law and therefore will determine the purposes for which personal data is processed (the ‘why’ and the ‘how’). Your Academy and authorised 3rd parties, e.g. Arbor, process and ‘use’ data on behalf of (under the supervision/control) the Trust and are therefore Data Processors.
- 4.1.2 The postal address of the Trust is:
- Bellevue Place Education Trust  
Kilburn Grange School  
Brent  
London  
NW6 7UJ
- 4.1.3 The Trusts DPO is Richard Crompton.
- 4.1.4 The Trust will ensure that your personal data is processed fairly and lawfully, is accurate, is kept secure and is retained for no longer than is necessary.

### **4.2 The Categories of Personal Data BPET Holds**

- 4.2.1 We process data relating to those we employ, or otherwise engage, to work at our Academies and Head Office. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:
- Personal information, including name, employee or teacher number, contact details, date of birth, marital status, next of kin and emergency contact numbers.
  - Contract information, such as start dates, hours worked, post, roles, salary information, annual leave, and pension and benefits information.
  - Financial information, such as 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 and professional memberships.
- Performance information, such as capability and outcomes of any disciplinary and/or grievance matters.
- Work absence data, such as number of absences and reasons.
- IT access information, including data about your use of the school's information and communications system.
- Census information relevant to the School Work Force Census.
- Other, including copy of driving licence, photographs and CCTV footage

4.2.2 We may also collect, store and use information about you that falls into Special Categories of more sensitive personal data, as defined by the General Data Protection Regulation (UK GDPR). This includes information about:

- Race, ethnicity, religious beliefs.
- Sexual orientation and political opinions.
- Trade union membership.
- Health, including any medical conditions, and sickness records.
- Genetic or biometric data.

### **4.3 Why BPET uses this Data**

4.3.1 The purpose of processing this data is to help the Trust and its Academies deliver outstanding education, including to:

- Enable individuals to be paid.
- Facilitate safe recruitment, as part of our safeguarding obligations towards students.
- 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.

### **4.4 Our Lawful Basis for Using this Data**

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

- Fulfil a contract we have entered into with you.
- Comply with a legal obligation in the field of employment, social security and social protection law.
- Carry out a task in the public interest, such as the delivery of education or in the area of public health.

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

- You have given us consent to use it in a certain way - for example to use your biometric data for the provision of catering services.
- We need to protect your vital interests (or someone else's interests).
- We have legitimate interests in processing the data - for example, where we might use personal information in relation to hiring out a sports facility in order to raise funds for the school.
- It is required for the establishment, exercise or defence of legal claims, or whenever courts are acting in their judicial capacity.

4.4.3 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. More detail is contained in the Trusts Data Protection Policy.

4.4.4 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.

## **4.5 Collecting Information**

4.5.1 Whilst 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 will 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.

## **4.6 How BPET Stores the Data**

4.6.1 The Trust creates and maintains an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

4.6.2 Personal data will not be retained by the Trust for longer than is necessary in relation to the purpose for which it was collected. Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our Records Retention Policy.

## **4.7 Data Sharing**

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

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

- The Local Authority - to meet our legal obligations to share certain information about our workforce members, such as safeguarding concerns.

- The Department for Education - to meet our legal obligations. This data sharing underpins workforce policy monitoring, evaluation, links to Academy funding / expenditure and the assessment of education attainment.
- Your family or representatives - in case of emergencies such as a health matter. ☒ Educators - necessary for the performance of our education function.
- Our regulator, Ofsted - to enable it to evaluate the education we provide in the public interest.
- Suppliers and service providers to enable them to provide the service we have contracted them for, such as our payroll provider.
- Disclosure and Barring Service - for the purpose of carrying out checks on your suitability for work with children.
- HMRC - to provide identity and pay information with regards your legal obligation to pay income tax and make national insurance contributions.
- Pension provider - in order to make sure that you pay the correct amount and maintain your entitlement to pension upon retirement. For teachers the scheme is Teachers' Pension Scheme (TPS), for support staff the scheme is Local Government Pension Scheme (LGPS).
- Child care provider - where you have decided to become part of a salary sacrifice scheme such as the child care vouchers, we share you details with the child care provider.
- Our auditors - we share financial data, which includes salary information with auditors as part of a legal obligation to have our accounts audited.
- Health and social welfare organisations - to enable us to comply with our duty of care and statutory safeguarding duties.
- Police forces, courts, tribunals - in order to uphold law and order.

#### **4.8 Transferring Data Internationally**

- 4.8.1 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.

#### **4.9 CCTV**

- 4.9.1 At Trust Head Office and at our Academies CCTV is operated on site. This is considered necessary to protect staff and students' safety and/or Trust property.

#### **4.10 Staff Rights**

- 4.10.1 Staff have the right to:

- Ask for access to your personal information.
- Ask for rectification of the information we hold about you.
- Ask for the erasure of information about you.
- Data portability i.e. have your personal information transmitted electronically to another organisation in certain circumstances.
- Object to us processing your information.

#### **4.11 How to Access Personal Information we Hold About you**

- 4.11.1 Individuals have a right to make a Subject Access Request to gain access to personal information that the Trust or Academy holds about them. If you want to make a request, please contact the Data Protection Officer.
- 4.11.2 If you make a Subject Access Request and we do hold the requested information about you, we will:
- Give you a description of it.
  - Tell you why we are holding and processing it, and how long we will keep it for.
  - Explain where we got it from, if not from you.
  - Tell you who it has been, or will be, shared with.
  - Let you know whether any automated decision-making is being applied to the data, and any consequences of this.
  - Give you a copy of the information in an intelligible form.
  - Respond without delay and within one month of receipt of the request.
- 4.11.3 More information regarding Subject Access Requests is detailed in the Trust Data Protection Policy.

#### **4.12 Other Staff Rights Regarding Data**

- 4.12.1 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 (by a computer or machine, rather than by a person).
  - In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- 4.12.2 To exercise any of these rights, please contact the Trust's Data Protection Officer (DPO).

#### **4.13 Complaints**

- 4.13.1 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 the DPO in the first instance
- 4.13.2 Alternatively, you can make a complaint to the Information Commissioner's Office:
- Report a concern online at <https://ico.org.uk/concerns>
  - Call 0303 123 1113.
  - Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

#### **4.14 Contact Details**

4.14.1 If you have any questions, concerns or would like more information about anything mentioned in this Privacy Notice please contact our DPO, details below:

- [dataprotectionofficer@bpct.co.uk](mailto:dataprotectionofficer@bpct.co.uk)