

Privacy Notice – (How we use visitors’ information)

This privacy notice will help you to understand what personal data the Gosport and Fareham Multi-Academy Trust (GFM) collects about you, how the GFM uses this personal data, and what rights you have regarding your personal data.

It is important that you read this notice, together with any other privacy notice that is provided to you on specific occasions when we are collecting or processing your personal data, so that you are aware of how and why we are using it.

This notice applies to individual persons who are external to the GFM. This notice does not form part of any contract. This notice can be updated at any time and we will inform you if this occurs.

Personal data is any information that can be used to identify a living individual, either on its own, or in combination with other pieces of data. Examples of personal data includes your name and address and email address.

Data processing includes the collection, use, and storage of data.

This notice is to inform visitors who attend GFM establishments on an ad-hoc basis or as part of a more long term agreement.

The Data Protection Officers for the GFM can be contacted via the GFM schools contact details.

1. The purpose of processing your data

The GFM processes your personal data for the purposes of site security.

2. The lawful basis for processing your data

The GFM processes your personal data for the purposes of the legitimate interest pursued by the controller, per Article 6(1)(c) of the GDPR.

3. Your rights

You have the following rights regarding your personal data:

- you have the right to request access to your data
- you have the right to correct your data if it is incorrect
- you have the right to obtain from the controller the erasure of your data
- you have the right to object to your data being processed

If you wish to exercise your rights please contact the Data Protection Officers.

4. If you do not provide your personal data

If you do not provide all of the requested personal data then the GFM may prevent access to its establishments.

5. Data Transfers

Your personal data will not be shared with any other organisation unless a safeguarding issue or concern is raised.

6. How long we keep your personal data

Your personal data will be retained for 6 months after your visit. In circumstances when someone is visiting the office on several occasions over a short period, their personal data will be retained until the final visit and then destroyed 6 months later. In the case of a safeguarding concern being raised, data can be held for a longer period of time.

7. The use of automated decision making

Your personal data is not used in any automated decision making (making a decision solely by automated means without any human involvement) or profiling (automated processing of personal data to evaluate certain conditions about an individual).

8. Change of purpose

We will only process your personal data for the purpose for which we collected it unless a safeguarding concern dictates otherwise.

9. Changes to this privacy notice

We reserve the right to update this privacy notice at any time and we will provide you with a new privacy notice when we make any substantial changes. We will also notify you in other ways from time to time about the processing of your personal data.

10. How to lodge a complaint

If you have a complaint regarding the processing of your personal data then please contact the Data Protection Officer listed above. You also have the right to lodge a complaint with the supervising authority, the Information Commissioner's Office (ICO), at any time. Should you wish to exercise that right, the full details are available at the [ICO website](#).

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

- personal information (such as name, address, telephone numbers, employee or teacher number, national insurance number, payroll information)
- special categories of data including characteristics information such as gender, age, ethnic group
- contract information (such as start dates, hours worked, post, roles and salary information)
- work absence information (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught)
- contact information (such as telephone numbers of contacts that an employee would want the Trust to contact in an emergency)

Collecting Information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

Why we collect and use this information

We use school workforce data to:

- enable the development of a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- enable individuals to be paid
- to make contact when not directly on the premises
- To contact others known to you, where you have provided their information, in cases where it would reasonable/necessary to contact that person or persons

The lawful basis under which we process this information

- Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- Vital interests: the processing is necessary to protect someone's life.
- Processing is necessary for a legal obligation to which the GFM(controller) is subject.
- Consent: the individual has given clear consent for you to process their personal data for a specific purpose.

GDPR Article 9

1. Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.

2. Paragraph 1 shall not apply if the following applies:

Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Storage and retention of information

The information is stored securely on School Information Management System (SIMS) and in locked filing cabinets.

This is currently retained for a period of 7 years from date of termination of employment.

With whom we share this information

This information is shared with:

- The Department for Education (DFE)
- Appropriate member schools and departments of the Gosport and Fareham Multi Academy Trust (GFM)

Why we share school workforce information

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

Department for Education (DfE)

We share personal data with the DfE on a **statutory basis**. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding and expenditure.

Member Schools of the GFM

We share personal data with other member schools of the GFM on a **legitimate interests basis**. This data sharing underpins workforce policy monitoring, evaluation, and links to GFM funding and expenditure.

Data collection requirements

The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005.

The department may share information about Trust employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis;
- producing statistics;
- providing information, advice or guidance.

The department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data;
- the purpose for which it is required;
- the level and sensitivity of data requested; and
- the arrangements in place to securely store and handle the data.

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

Requesting access to your personal data

Under data protection legislation, school workforce members have the right to request access to information about them that we hold. To make a request for your personal information, contact the Trust's **Data Protection Officer** (DPO)

School workforce members also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations.

If you have a concern about the way school workforce data is collected or used, we ask that you raise your concern with the GFM DPO in the first instance. If the need arises, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>.