

Privacy Notice for Staff

Document Owner	DPO/HR
Last updated	October 2025
Version number	4
Review date	October 2027

Contents

1. Definitions	3
2. Application of this Notice	3
3. Relationship with DEMAT values	3
4. Associated Policies and Documents	4
5. Version Control	4
6. Purpose and Scope	5
7. The personal data we hold	5
8. Why we use this data	6
9. Our lawful basis for using this data	7
10. Collecting this information	8
11. How we store this data	8
12. Data sharing	9
13. Automated decision making	9
14. Requesting access to your personal data	9
15. The right to lodge a complaint	10
16. Contact	10

1 Definitions

- 1.1 **DEMAT** means the Diocese of Ely Multi-Academy Trust
- 1.2 **Trust** means the Diocese of Ely Multi-Academy Trust
- 1.3 **Academy** means a constituent academy of DEMAT
- 1.4 **Central Team** means Staff who are not employed within an academy
- 1.5 **Personal data** means any information relating to an identified, or identifiable individual. This may include the individual's name (including initials); identification number; location data; online identifier, such as a username. It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity
- 1.6 **Special categories of personal data** means personal data which is more sensitive and so needs more protection, including information about an individual's racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetics; biometric data (where used for identification purposes); health – physical or mental; sexual life or sexual orientation
- 1.7 **Processing** means anything done to personal data, such as collecting, recording, organising structuring, storing adapting, altering, retrieving, using, disseminating, erasing or destroying. Processing can be automated or manual.
- 1.8 **Data Controller** means a person or organisation that determines the purpose and the means of processing of personal data
- 1.9 **KCSIE** means Keeping Children Safe in Education 2024.

2. Application of this Notice

- 2.1 This notice is to be used by all staff employed by DEMAT.

3. Relationship with DEMAT Values

- 3.1 The application of this policy must be applied at all times in a way that reflects the values of DEMAT and our Christian Ethos:

Love – We engender love and tolerance between and for our staff, pupils and others to foster an inspiring atmosphere of mutual support.

Community – We are committed to ensuring our schools are a living part of the community and contribute positively to its needs.

Respect – We do everything to provide a caring, safe and secure place for our staff and pupils to be happy and respected in our schools so they may achieve their potential.

Trust – We acknowledge accountability and responsibility for our actions and ensure that we encourage each other to make brave decisions and then learn from any mistakes.

Ambition – We are determined that our schools offer a place for the joy of learning, enabling those of all abilities to thrive and go on to lead rewarding lives.

- 3.2 This is further defined in the four key strands of DEMAT, all of which are underpinned by our Christian distinctiveness,

Children are at the heart of all we do

Keep close to the work

Maintaining a legacy, creating new traditions

Aspirational, yet sustainable

4. Associated Policies and Documents

- 4.1 This Notice should be read in conjunction with the following DEMAT Policies/Procedures:

Data Protection Policy
Records Management Policy

5. Version Control

No.	Status of document/changes	Prepared by	Reviewed by	Approved by	Date of approval	Review Date
1.	Baseline policy introduced					
2.	Amended for GDPR	DPO		Standards and Ethos Committee	Sept 2018	
3.	Updated to reflect revised DFE Guidance	Joint DPO			Aug 2022	
4.	Reviewed and updated	SHRB	DPO			Oct 2027

- 5.1 This document will be reviewed on a bi-annual basis.
- 5.2 For all questions in relation to this policy please contact hrteam@demat.org.uk.

6 Purpose and Scope

- 6.1 The Trust collects and processes personal data relating to its employees and former employees to manage the employment relationship and its post-employment obligations. The Trust is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.
- 6.2 Under data protection law, individuals have a right to be informed about how the Trust 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.
- 6.3 This privacy notice explains how we collect, store and use personal data about individuals applying for employment or to be otherwise engaged, to work or support our academies or for the Central Team.
- 6.4 DEMAT is the 'data controller' for the purposes of data protection law.

7. The personal data we hold

7.1 *Personal data*

- 7.1.1 We process data relating to those we employ, or otherwise engage, to work at our Trust. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:
- your name, address and contact details, including email address and telephone number, date of birth and gender;
 - the terms and conditions of your employment;
 - details of your qualifications, skills, experience, and employment history, including start and end dates with previous employers and with the Trust, as well as your reasons for leaving previous employment;
 - information about your remuneration, including entitlement to benefits such as pensions.
 - details of your bank account and national insurance number;
 - information about your marital status, next of kin, dependants and emergency contacts;
 - information about your nationality and entitlement to work in the UK;
 - information about your criminal record, including allegations of criminal offences;
 - Information sourced about you from online sources including your social media activity where relevant to satisfy our safeguarding obligations during the recruitment process.
 - details of your work pattern (days of work and working hours) and attendance at work;
 - details of periods of leave taken by you, including holiday, sickness absence, family leave, and the reasons for the leave;

- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- assessments of your performance, including appraisals, performance reviews, training you have participated in, performance improvement plans and related correspondence;
- CCTV footage and photographs.

7.2 Special Category Data

7.2.1 We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- information about medical or health conditions, including whether you have a disability for which the Trust needs to make reasonable adjustments;
- details of trade union membership; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief
- political activity

7.3 Criminal Offence Data

7.3.1 Criminal offence data is personal data that's treated in a similarly sensitive way to special category data. It records criminal convictions and offences or related security measures.

7.3.2 Criminal offence data includes:

- the alleged committing of an offence
- the legal proceeding for an offence that was committed or alleged to have been committed including sentencing.

7.3.3 The Trust may process criminal records data to assess your suitability for employment both when you are recruited (through appropriate criminal records checks) and in the course of your employment. We process criminal offence data in storing the outcome of a Disclosure and Barring Service (DBS) check on employees, non-employed staff and volunteers. This applies even where there are no convictions recorded on the check.

8 Why we use this data

8.1. The purpose of processing this data is to help us run the Trust, and meet our legal obligations including to:

- provide you with a contract of employment;
- pay you in accordance with your contract and administer benefits such as pension;
- to ensure it is complying with legal obligations (for example to check an employee right to work in the UK)
- facilitate safer recruitment, as part of our safeguarding obligations towards children including
- run recruitment and promotion processes;

- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- ensure employees are complying with relevant policies and procedures and to maintain the security of our computer and other IT systems;
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental leave, shared parental leave, and parental bereavement leave), to allow effective workforce management, to ensure that the Trust complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;
- provide references on request for current or former employees;
- respond to and defend against legal claims and enforce its legal rights; and
- maintain and promote equality in the workplace.
- Enable the development of a comprehensive picture of the workforce and how it is deployed.
- Allow better financial modelling and planning.
- Improve the management of workforce data across the sector.
- Support the work of the School Teachers' Review Body.

9 Our lawful basis for using this data

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

- 9.1.1 Comply with a legal obligation
- 9.1.2 Fulfil a contract we have entered into with you.
- 9.1.3 Carry out a task in the public interest.

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

- 9.2.1 You have given us consent to use it in a certain way
- 9.2.2 We need to protect your vital interests (or someone else's interests)

9.3 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 withdraw consent if you wish to do so.

- 9.4 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

10 Collecting this Information

- 10.1 The Trust collects information in a variety of ways. For example, data is collected through application forms and CVs; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment (such as benefit nomination forms); from correspondence with you; or through interviews, meetings or other assessments.
- 10.2 In some cases, the Trust collects personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, information obtained from social media monitoring and information from criminal records checks permitted by law.
- 10.3 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 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.

11 How we store this data

- 11.1 We take the security of your personal data seriously. All appropriate, technical and organisational measures are taken to ensure security of storage and access to your data.
- 11.2 The Trust will hold your personal data for the duration of your employment. Thereafter, we hold data securely for the set amount of time shown in our data retention schedule which can be located in our Records Management Policy.
- 11.3 Where the Trust has engaged the services of third parties to provide services on our behalf and on behalf of employees, it does so on the basis of a comprehensive service supply contract which obliges them to comply fully with the data protection legislation including information security.

12 Data Sharing

- 12.1 Your information will be shared internally, including with members of the HR (including payroll), your line manager, managers in the academy/team in which you work and IT staff if access to the data is necessary for performance of their roles.
- 12.2 We do not share information about our workforce members with anyone without consent unless the law and our policies allow us to do so.
- 12.3 Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:
- HMRC reporting requirements
 - Central and local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns
 - Government Departments as required, e.g The Department for Education, Ofsted, etc
 - Your family or representatives
 - Other employers to obtain pre-employment references.
 - Disclosure and Barring Service to obtain necessary criminal background checks
 - Police forces, courts, tribunals
 - Professional bodies
 - Payroll and pension providers
 - Educators and examining bodies
 - Financial organisations
 - Our auditors
 - Survey and research organisations
 - Trade unions and associations
 - Health authorities
 - Security organisations
 - Professional advisers and consultants
 - Charities and voluntary organisations
 - Professional bodies
 - Employment and recruitment agencies

13 Automated decision-making

- 13.1 Employment decisions are **not** based on automated decision-making.

14 Requesting Access to Your Personal Data (and other rights)

- 14.1 Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the data protection officer at dpo@demat.org.uk
- 14.2 You also have the right to:

- 14.2.1 Have your personal data rectified if it is inaccurate or incomplete
- 14.2.2 Request the deletion or removal of personal data where there is no compelling reason for its continued processing
- 14.2.3 Restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- 14.2.4 Object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics.
- 14.2.5 Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.

15 The right to lodge a complaint

- 15.1 We take any complaints about our collection and use of personal information very seriously.
- 15.2 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 us in the first instance by contacting the DPO.
- 15.3 Alternatively, you can make a complaint to the Information Commissioner's Office using one of the following methods:
 - 15.3.1 Report a concern online at <https://ico.org.uk/concerns/>
 - 15.3.2 Call 0303 123 1113
 - 15.3.3 Write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

16. Contact

- 16.1 If you would like to discuss anything in this Privacy Notice, please email the Data Protection Officer or write to the Data Protection Officer at:
 - 16.1.1 dpo@demat.org.uk
 - 16.1.2 The Data Protection Officer, Diocese of Ely Multi-Academy Trust, Grace Building, 8 High Street, Ely, CB7 4JU