



## PRIVACY NOTICE - STAFF

### WHO PROCESSES YOUR INFORMATION?

Hindley Junior and Infant School (Hindley J & I School) and Achievement through Collaboration (AtC) both process information about you in accordance with the UK GDPR and Data Protection Act 2018. Both parties are data controllers. This means that they determine the purposes and the manner in which any personal data relating to staff is to be processed which comes under their control. This privacy notice provides information regarding the sharing of personal data between Hindley J & I School and AtC during the academy conversion.

Hindley J & I School and AtC have agreed to work in partnership with one another whilst preparations are made for Hindley J&I School to join AtC. This notice applies to staff employed by Hindley J & I School whose employment is expected to transfer to AtC under TUPE as part of the academy conversion. This notice supplements the staff privacy notices of Hindley J & I School and AtC and relates specifically to data sharing for the academy conversion.

Both Hindley J&I School and AtC have Data Protection Officers. The Data Protection Officer's role is to oversee and monitor our data processing practices. If you have any queries regarding anything in this privacy notice please contact:

Hindley J & I School Data Protection Officer	AtC Data Protection Officer
Janet Davies Town Hall Library Street Wigan WN1 9SE  <a href="mailto:dataprotectionofficer@wigan.gov.uk">dataprotectionofficer@wigan.gov.uk</a>	Ben Cain FEPS DPO Service First Floor, Unit A, Cedar Court Office Park, Denby Dale Road, Wakefield, WF4 3FU  <a href="mailto:dpo@feeps.co.uk">dpo@feeps.co.uk</a>

01942 827028	01924 827869
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Where necessary, third parties may process personal information relating to staff. Where this is required, Hindley J & I and Achievement Through Collaboration place data protection requirements on third party processors to ensure data is processed in line with privacy rights.

## **TYPES OF INFORMATION THAT WE COLLECT, PROCESS, HOLD AND SHARE INCLUDES:**

- Personal information (ie names, email address, home address)
- Date of birth
- Hours per week
- Allowance (where relevant)
- National Insurance Number
- Job Title
- Salary
- Service details
- General HR administration (eg ongoing disciplinary matters, sickness absence, investigations etc)

If, as part of the data sharing, we need to share any special category data (such as information about your health), this will be done in accordance with the additional safeguards required by data protection law and the appropriate policy documents held by each organisation.

## **WHY DO WE NEED YOUR INFORMATION:**

The personal information is processed for the following reasons:

- To familiarise staff with AtC's policies, systems and procedures prior to transfer
- To ensure that, in line with our legal obligations, staff data is transferred over to AtC ahead of academy conversion, as part of the TUPE process.
- To set up staff accounts with providers of employee benefits such as Simply Health (to provide health cash plans and related employee benefits).

## **THE LAWFUL BASIS ON WHICH WE PROCESS THIS INFORMATION:**

Processing and using your personal information in this way is lawful because:

- Article 6 1(c) of the UK GDPR allows processing that is necessary to comply with a legal obligation, for example AtC's legal obligations under the Transfer of

Undertakings (Protection of Employment) Regulations 2006 as part of the academy transfer process, including the provision of employee liability information.

- Article 6 1 (f) of the UK GDPR allows processing that is necessary for the purposes of a legitimate interest, for example the sharing of workforce data in order to ensure staff are familiar with AtC's policies, systems and procedures and to plan and manage the transfer. These interests are not overridden by your rights and freedoms, given the limited nature of the data shared and the safeguards described in this notice.

Where we share or process any special category data, we will do so in reliance on an appropriate condition in Article 9 of the UK GDPR (for example Article 9 (2) (b) - employment, social security and social protection law) and in accordance with the appropriate documents held by each organisation.

## STORING STAFF INFORMATION:

Hindley J & I School and AtC store personal data securely in line with their Data Protection policies. In accordance with data protection legislation, personal information is only retained for as long as is necessary to fulfil the purposes for which it was obtained, and not kept indefinitely. Staff records will be retained in line with the HR retention schedules and record management policies of Hindley J & I School and AtC, details of which can be found on their respective privacy notices or record management policies.

## WHO WE SHARE DATA WITH:

Hindley J & I School and AtC share your information where this is necessary for the purposes set out in this notice, where we are required to do so by law or where we have another lawful basis under the data protection legislation. As part of the academy transfer process. AtC will share personal information with providers of staff benefits such as Simply Health in order to set up accounts and administer health cash plans and related employee benefits. For more information on who both Hindley J & I School & AtC share personal information with please see their privacy notices ([Hindley J & I School Privacy Policies](#)) & ([AtC Privacy Notices](#)).

## WHAT ARE YOUR RIGHTS?

Staff have specific rights in relation to the processing of their personal data. You have a legal right to:

- Request access to the personal data that Hindley J & I School and AtC hold about you.
- Request that your personal data is amended if it is inaccurate or incomplete.
- Request that your personal data is erased where there is no legal basis for its continued processing.
- Regarding that the processing of your personal data is restricted.
- Object to your personal data being processed if it is likely to cause, or is causing, damage or distress.

If you have a concern about the way we are collecting or using personal data, you may wish to raise this informally with either Hindley J & I School or AtC or with the Data Protection Officer for either establishment in the first instance. Alternatively you can contact the Information Commissioner's Office at [Information Commissioner's Office](#) at [www.ico.org.uk](http://www.ico.org.uk) or by calling 0303 123 1113.

This is a joint privacy notice issued by Hindley J & I School and AtC for the purposes of the academy conversion.