



The Gryphon Trust

Staff Privacy Notice

POLICIES AND PROCEDURES PROFORMA

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Author:	Miss Milligan
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By whom agreed:	
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Amendments Summary:

Amend. No.	Issued	Page	Subject

1.0 Aims

- 1.1 The GDPR, General Data Protection Regulation came into force in May 2018. This affects The Gryphon Trust as we process personal data about staff, students, parents and suppliers.
- 1.2 Our Trust works to collect and use personal information fairly and transparently
- 1.3 A privacy notice helps us to describe all the privacy information that we make available or provide to individuals when we collect information about them
- 1.4 Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

2.0 Data Controller

- 2.1 The Gryphon Trust processes personal information relating to pupils, staff, parents, suppliers and visitors, and, therefore, is a data controller. The Arnewood School and Eaglewood School are both responsible for GDPR compliancy under the Gryphon Trust.
- 2.2 The Gryphon Trust is registered as a data controller with the Information Commissioner's Office and renews this registration annually, registration reference Z2600946.

3.0 Data Protection Officer

- 3.1 The data protection officer for the Gryphon Trust is Judicium Consulting Limited
Address: 72 Cannon Street, London, EC4N 6AE
Email: dataservices@judicium.com
Web: www.judiciumeducation.co.uk
Telephone: 0203 326 9174
Lead Contact: Craig Stilwell

4.0 Data Subject

- 4.1 The Data Subject is the person whose personal data is held or processed e.g. a student. Data Subjects have rights under the GDPR:
 1. The right to be informed
 2. The right of access
 3. The right to rectification
 4. The right to erase
 5. The right to restrict processing
 6. The right to data portability
 7. The right to object
 8. Rights in relation to automated decision making and profiling

5.0 Staff Personal Data

- 5.1 We process data relating to those we employ to work at, or otherwise engage to work at, our Trust. The purpose of processing this data is to assist in the running of the school, including to:
 - Enable individuals to be paid
 - Facilitate safe recruitment
 - Support the effective performance management of staff
 - Improve the management of workforce data across the sector
 - Inform our recruitment and retention policies
 - Allow better financial modelling and planning
 - Enable ethnicity and disability monitoring
 - Support the work of the School Teachers' Review Body

- 5.2 Staff personal data includes, but is not limited to, information such as:
- Contact details
 - National Insurance, Employee and Teacher Numbers
 - Absence data
 - Outcomes of any disciplinary procedures
 - DBS & CRB check results
 - Contract Information (such as start dates, hours worked, post, roles and salary information)
 - Qualifications, and where relevant, subjects taught
 - Emergency contact details (Next of Kin) for Staff Member
- 5.3 We will only retain the data we collect for as long as is necessary to satisfy the purpose for which it has been collected. For full details of this, please refer to the Gryphon Trust Data Retention Schedule.
- 5.4 We do not share information about workforce members with anyone without consent unless the law and our policies allow us to do so.
- 5.5 The collection and processing of the personal data outlined above is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- 5.6 We share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding / expenditure and the assessment educational attainment.
- 5.7 We are required to share information about our pupils with the (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

6.0 Special Category Data

- 6.1 We also collect ‘Special Category Data’ for staff, including;
- Race
 - Ethnic Origin
 - Language
 - Country of birth
 - Nationality
 - Biometric
- 6.2 This type of personal data is classified as ‘Special Category Data’, which the GDPR says is more sensitive and therefore, requires more protection.
- 6.3 The lawful basis for processing this special category data is ‘consent’. This means the staff member has opted in to give permission to share this data with the Trust.
- 6.4 The condition for processing the special category data, listed above, under Article 9 of the GDPR is ‘*the data subject has given explicit consent to the processing of those personal data for one or more specified purposes*’.
- 6.5 Staff have the right to withdraw this consent at any time by informing the school in writing of this withdrawal of consent. The Gryphon Trust will then confirm the personal data has been removed within 30 days and will ensure to inform any applicable third parties without undue delay.
- 6.6 The other type of special category personal data we collect and process for staff is:
- Health information
- 6.7 The purposes of processing health information is to ensure The Gryphon Trust are aware of any medical conditions the Gryphon Trust staff have, to ensure that the Trust are able to minimize risks to staff and

pupils and ensure their safety whilst at school.

6.8 The lawful basis for processing this special category data is ‘Public interest’ and the condition for processing this special category data is ‘*processing is necessary for reasons of substantial public interest*’.

7.0 Criminal Offence Data

7.1 Criminal Offence Data refers to personal data relating to criminal convictions and offences, or related security measures.

7.2 The GDPR says “Processing of personal data relating to criminal convictions and offences or related security measures based on Article 6(1) shall be carried out only under the control of official authority or when the processing is authorised by Union or Member State law providing for appropriate safeguards for the rights and freedoms of data subjects. Any comprehensive register of criminal convictions shall be kept only under the control of official authority.”

7.3 The Gryphon Trust processes staff criminal offence data in an official capacity as the law states staff who work with children are to undergo criminal offence checks including CRB and DBS checks.

7.4 The other external companies that personal data may be shared with are under the processing reason of ‘public task’ apart from the Trust-e/School Cash Office which is required under ‘consent’:

Shared with	Type of data shared	Reason for sharing
Arnewood to Firefly – The Arnewood Learning Platform	Staff names, timetables, photos and tasks set/page content	To provide a platform to set work and homework to students
Arnewood to Biostore Software and Tucasi School Cash Office	Staff name, number and payment details	Required to top up canteen balance. Optional to use, cash can be brought into the finance office if preferred
Arnewood & Eaglewood to Microsoft – Office365	Staff accounts, full name, user name, emails, timetables	Any data within Office 365 is within the UK under our private accounts
Arnewood & Eaglewood to Arbor	Staff details, timetables, details of behaviour and reward points given	To take attendance and progress for the students
Arnewood & Eaglewood to CPOMS	Staff details, child protection data, track referrals	Management of child protection and similar incidents and actions. To also track referrals to external agencies
Arnewood to 4Matrix	Staff details	For progress monitoring and intervention, reporting results to inform planning and teaching
Arnewood to Zoom	Staff name and email address, recordings of meetings (for 6 months)	For remote learning and teaching alongside meetings with 3rd parties
Arnewood & Eaglewood to National College	Staff name, email address, role, courses accessed	For ongoing staff development
Arnewood to Seneca Learning	Staff name and school email address	To set revision tasks, exam board specific for students
Arnewood & Eaglewood to the Police and other law enforcement agencies	Staff online activity from each School to the Police and other law enforcement agencies	To monitor and be aware of suspicious online activity from our School networks, helping to keep our systems and data secure

Shared with	Type of data shared	Reason for sharing
Arnewood & Eaglewood to IRIS Financials	Names, Address, Bank Account Details, NI Number, NI Letter, Employment status, DOB, Gender, Marital Status, Phone numbers, Photo, Contact details, Pension details, Training & qualification details and scanned documents.	Accurate financial planning and budgeting exercises and to pay staff in accordance with their contract.
Arnewood to Unifrog	Name, email address, password, subject taught.	Unifrog allows teachers and support staff to interact with students with the aim to enhance teaching and learning that is taking place.

8.0 Consent

- 8.1 In the staff data section above there are some personal data categories that are provided with the individuals consent.
- 8.2 This consent is requested by the data subject at the start of their application to the Gryphon Trust. This consent status, and associated data, is then reminded to individuals on a yearly basis. Consent can be removed at any time but the yearly reminders are in place to ensure any data The Gryphon Trust keeps is kept as up to date as possible. This data check reminder is sent to all pupils/carers/parents and staff on a yearly basis.

9.0 Retention Schedule

- 9.1 All personal data collected and processed by The Gryphon Trust is kept for a static amount of time, depending on the type of data, and then securely disposed of. This includes both electronic versions and hard copies. Please refer to the Gryphon Trust Data Retention Schedule for full details.

10.0 Transfer of Data

- 10.1 The Gryphon Trust may only transfer data outside of the EEA where the organization receiving the personal data has provided adequate safeguards, this may be through legally binding agreements, data protection clauses or if the transfer is subject to suitable safeguards put in place by the organization to protect the data. We will share with you any such occurrences.
- 10.2 The only current occurrence of this is data on the Gryphon Trust & schools of the Gryphon Trust official websites that contain information and images of data subjects. Putting data on a website may result in transfers to countries outside the EEA. The transfer will take place when someone outside of the EEA accesses the website.
- 10.3 This type of personal data placed on the school's websites is through consent of the data subject and/or their parent/carers. You have the right for this information to be revoked at any time. Please see the next section in this notice for full details.

11.0 Requesting Access to Your Data

- 11.1 Under data protection legislation, staff have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to an employee or educational record, contact The Data Protection Officer, Judicium Consulting Limited
Address: 72 Cannon Street, London, EC4N 6AE
Email: dataservices@judicium.com
Web: www.judiciumeducation.co.uk
Telephone: 0203 326 9174

Lead Contact: Craig Stilwell

11.2 This request for data is called a ‘Subject Access Request (SAR)’. Once this is received in writing who you would like the information on, a contact number and email address, and details of the data you would like to see, the Data Protection Officer will confirm receipt of the request and where possible and applicable, will issue the requested data within 30 days. Please view The Gryphon Trust Data Protection Policy for any further details on this process.

11.3 You can also request this through the Judicium form online here:

[https://www.jedu.co.uk/secure/informationrequest/\\$2y\\$10\\$QVVGJLOaRsiJIC2kHJP8kIu7YwE7bCEaOpRJY1t17sIqTuFiMC0f2S8](https://www.jedu.co.uk/secure/informationrequest/$2y$10$QVVGJLOaRsiJIC2kHJP8kIu7YwE7bCEaOpRJY1t17sIqTuFiMC0f2S8)

11.4 Or for any Freedom of Information requests, please use this form:

11.5 You 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

11.6 If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance.

11.7 Alternatively, you can contact the Information Commissioner’s Office at <https://ico.org.uk/concerns>

12.0 Request to Change or Erase Data

12.1 The GDPR has introduced a right for individuals to have personal data erased. This is also known as ‘the right to be forgotten’. This right is not absolute and only applies in certain circumstances. Most of the data that The Gryphon Trust collects is due to a public task we perform and therefore a lot of data is unable to be erased, but individuals can make a request for erasure verbally or in writing. The Gryphon Trust will respond to this within 28 days.

12.2 If the Gryphon Trust have data that is incorrect on a data subject, we encourage data subjects to ensure any data they provide us is kept up to date. Once data is collected, students and parents/carers then have the right to change this data with The Gryphon Trust either in person or in writing. Links are also available on the corresponding school’s website.

13.0 Contact

13.1 If you would like to discuss anything in this privacy notice, please contact the Gryphon Trust Data Protection Officer -

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