



Privacy notice for the school workforce

What is this document and why should you read it?

This privacy notice explains how and why the Nene Education Trust including each of its Academies and the Central Services team (also referred to as "**The Trust**", "**we**", "**our**" and "**us**") uses personal data about our employees, staff, contractors, trainees, officers, consultants, and temporary or agency workers (referred to as "**you**").

You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances in the future.

This notice does not form part of your contract of employment or any other contract to provide services.

The Trust's data protection responsibilities

"**Personal data**" is any information that relates to an identifiable natural person. Your name, address, contact details, salary details and work history are all examples of your personal data, if they identify you.

The term "**process**" means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.

The Trust is a "**controller**" of your personal data. This is a legal term – it means that we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws.

You also have responsibilities whenever you process personal data in connection with the performance of your role at the Trust; these are outlined in the Trust's Data Protection Policy.

The personal data we hold

We collect many different types of personal data about you for lots of reasons. We cannot administer our employment or other relationship with you without your personal data. Where we do not require your personal data, we will make this clear, for instance we will explain if any data fields in our application or staff survey processes are optional and can be left blank.

Further details of the personal data we collect, where we get it from and what we do with it are set out in **Schedule 1**.

You provide us with personal data directly when you apply for a job with us, when you complete our Trust Application Form or correspond with us and in the course of performing your job. We also create some personal data ourselves and obtain some personal data from other sources including: your emergency contacts, your use of

Trust provided assets, systems and platforms, your line manager and co-workers, your dependants and beneficiaries, third party benefits providers. You can read more about the sources of personal data in the more detailed information set out in as explained in **Schedule 1**.

Why we use this data

We process your personal data for particular purposes in connection with your employment or engagement with us, and the management and administration of our business. These include:

- Administering your application for a job and entering into a contract of employment with you
- Workforce planning, development and retention
- Support effective performance management
- Inform our recruitment and retention policies
- Managing, monitoring and reporting on equal opportunities
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Enable you to be paid correctly
- General communication, employment management and administration
- Responding and complying with regulatory, statutory or enforcement requests and orders

Our lawful basis for using this data

We are required by law to always have a permitted reason or justification (called a "lawful basis") for processing your personal data. There are **six** such permitted lawful basis for processing personal data

Most commonly, we use it where we need to:

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

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

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)
- We have legitimate interests in processing the data – for example, where:
[If you use this basis at all, set out the situations here]

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.

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.

Collecting this information

While 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. In some instances, where you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract of employment or engagement with you.

How we store this data

Personal data is stored in line with our Data Protection Policy.

We create and maintain 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.

When your employment with us ends, we will keep your personal data for a limited period of time and for as long as is necessary in connection with both our and your legal rights and obligations. This will also include:

- any laws or regulations that we are required to follow;
- whether we are in a legal or other type of dispute with each other or any third party;
- the type of information that we hold about you; and
- whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.

The usual period of time for retaining employee files when the employment contract has ended is 7 years. Files are stored securely and then confidentially destroyed by a third party.

Any personal data contained in any work related correspondence or records may be retained for longer, dependant on the retention period of the file that your personal data is held on.

Data sharing

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

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.

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

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Your family or representatives

- Educators and examining bodies
- Our regulator e.g. Ofsted,
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll, HR and Occupational Health
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Trade unions and associations
- Health and social welfare organisations
- Police forces, courts, tribunals
- Employment and recruitment agencies

Transferring data internationally

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.

Your rights

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold 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

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact your Principal or our data protection officer.

Your other rights regarding your data

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
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

Complaints

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 us in the first instance with Sarah Charles, HR Director.

To make a complaint, please contact our Data Protection Officer (please see details below).

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

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact Sarah Charles, HR Director or our Data Protection Officer:

- Ruth Hawker, Plumsun Ltd www.plumsun.com

This notice is based on the Department for Education's model privacy notice for the school workforce, amended to reflect the way we use data in this school.

SCHEDULE 1

Categories of personal data

| Type of personal data | Collected from ¹ |
|--|--|
| a) Contact Information <ul style="list-style-type: none"> • Name(s) • Address(es) • Email address(es) • Contact details including mobile telephone number(s) | You |
| b) Personal Information <ul style="list-style-type: none"> • Date of birth • Gender • Next of kin or other dependants • Marital or relationship status • Emergency contact information | You |
| c) Identity and Background Information <ul style="list-style-type: none"> • Details of education and qualifications and results • Career history, experience and skills • Passport information • Driving licence information • Right to work, residency and/or other visa information (where unrelated to your race or ethnicity) • Work history • Image or photographs • Application form • Evaluative notes and decisions from job interviews • Conflicts of interests (including where related to family networks) | <ul style="list-style-type: none"> • You • Recruitment consultants and agencies • Your previous employers • Publically available information from online resources |
| d) Financial Information <ul style="list-style-type: none"> • Bank account details | <ul style="list-style-type: none"> • You |

| Type of personal data | Collected from ¹ |
|--|--|
| <ul style="list-style-type: none"> • Salary, compensation and other remuneration information • National insurance number and/or other governmental identification numbers • | <ul style="list-style-type: none"> • Your previous employer |
| <p>e) Special Category Personal Data</p> <ul style="list-style-type: none"> • Racial or ethnic origin (including your nationality and visa information) • Religious or philosophical beliefs • Trade union membership • Biometric data (fingerprint) • Data concerning physical and/or mental health (including occupational health requirements, accident reports, day-to-day health concerns such as diabetes or epilepsy conditions which we should be aware of, dietary requirements, allergies, drug and alcohol test results and reasons for any short term or long term absence) • Sexual orientation • Health and safety and accident records and reports • Information relating to actual or suspected criminal convictions and offences | <ul style="list-style-type: none"> • You • Your emergency contact(s) • Your use of Trust security control systems |
| <p>f) Employment Administration Information</p> <ul style="list-style-type: none"> • Terms and conditions of employment • Work related contact details (including location and office and corporate phone numbers) • Image/photographs • Holiday and other leave related records • Hours worked and working time preferences • Statutory and non-statutory leave and absence records • Job termination details | <p>You</p> |
| <p>g) Job Performance Information</p> <ul style="list-style-type: none"> • Role responsibilities • Personal development reviews and appraisals, and associated feedback • Training records • Attendance information, including clocking in/out systems or timesheets • Promotion application and/or outcome records • Transfer and secondment information | <ul style="list-style-type: none"> • You • Your line manager(s) and co-workers • Training providers |

| Type of personal data | Collected from ¹ |
|---|---|
| | <ul style="list-style-type: none"> Company to which transferred or seconded |
| <p>h) Investigation, Grievance and Disciplinary</p> <ul style="list-style-type: none"> The Trust's investigations records Grievance and disciplinary records Employment tribunal records | <ul style="list-style-type: none"> You Your line manager(s) and co-workers Third parties, as permitted by applicable law |
| <p>i) Travel and Expenses Information</p> <ul style="list-style-type: none"> Business expenses and reimbursement details | <ul style="list-style-type: none"> You |
| <p>j) Benefits Information</p> <ul style="list-style-type: none"> Life assurance and pensions memberships for you and/or your dependants or other beneficiaries Death benefit information | <ul style="list-style-type: none"> You Third party benefits providers Your dependants or other beneficiaries |
| <p>k) Systems and Communications Information</p> <ul style="list-style-type: none"> Computer and phone records Access logs and usage records from document management systems and other Trust provided applications and technologies User IDs and password information Records of calls, messages and/or internet or other data traffic and communications | <ul style="list-style-type: none"> You Us Our suppliers Your use of Trust assets, systems and platforms |

| Type of personal data | Collected from ¹ |
|--|--|
| <p>l) Security, Location and Access Information</p> <ul style="list-style-type: none">Information captured or recorded by electronic card access systems, CCTV and other security control systems | <ul style="list-style-type: none">YouYour use of Trust security control systems |