



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 (Data Controller) including each of its schools 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.

Nene Education Trust the Trust of which you are an employee, contractor or volunteer is in charge of personal information about you. This means the Trust is the Data Controller.

The postal address of the Trust is:

**Nene Education Trust
Mountbatten Way
Raunds
Wellingborough
Northants., NN9 6PA.**

Email: enquiries@neneeducationtrust.org.uk

Tel: 01933 627081

If you would like to contact us about the personal data and information we hold on your behalf please contact our Data Protection Officer.

Angela Corbyn on 07775 436141. Or email dpo@neneeducationtrust.org.uk. Or leave a letter at our offices at the address above.

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.

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

Type of personal data
Contact Information
<ul style="list-style-type: none"> • Name(s) • Address(es) • Email address(es) • Contact details including mobile telephone number(s)
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
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)
Financial Information
<ul style="list-style-type: none"> • Bank account details • Salary, compensation and other remuneration information • National insurance number and/or other governmental identification numbers
Special Category Personal Data
<p>We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:</p> <ul style="list-style-type: none"> • Any health conditions you have that we need to be aware of • Sickness records • Photographs and CCTV images captured in school • Trade union membership • Racial or ethnic origin (including your nationality and visa information) • Religious or philosophical beliefs • Trade union membership • Biometric data (fingerprint) used at Manor School only • 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

Type of personal data
<ul style="list-style-type: none"> 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
Employment Administration Information
<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
Job Performance Information
<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
Investigation, Grievance and Disciplinary
<ul style="list-style-type: none"> • The Trust's investigations records • Grievance and disciplinary records • Employment tribunal records
Travel and Expenses Information
<ul style="list-style-type: none"> • Business expenses and reimbursement details
Benefits Information
<ul style="list-style-type: none"> • Life assurance and pensions memberships for you and/or your dependants or other beneficiaries • Death benefit information
Systems and Communications Information
<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
Security, Location and Access Information
<ul style="list-style-type: none"> • Information captured or recorded by electronic card access systems, CCTV and other security control systems

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.

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

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:

- Confirming your identity
- Facilitate safer recruitment checks, as part of safeguarding obligations towards pupils
- 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
- Enable you to be paid correctly
- General communication, employment management and administration
- Responding and complying with regulatory, statutory or enforcement requests and orders
- Protect staff welfare
- Comply with that statutory duties placed on us.
- Ensure the safety of individuals on the Trust sites
- Enable equalities monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body

Use of your personal data in automated decision making and profiling

- We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

Use of your personal information for marketing purposes

Where you have given us consent to do so, Nene Education Trust may send you marketing information by email or text promoting Trust events, campaigns, charitable causes or services that may be of interest to you. You can withdraw consent or 'opt out' of receiving these texts and/or emails at any time by clicking on the "Unsubscribe" link at the bottom of any such communication

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:

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.

Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

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.

If there is no legal requirement to collect and store data when we will explain why we need it and what the consequences are if it is not provided.

We also collect information from a previous employer or educational establishment. You will know about this because you will have provided us with the relevant contact details.

How we store this data

Personal data is stored in line with our Data Protection and FOI 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.

We only keep your information for as long as we need it for or for as long as we are required by law to keep it. The Trust has a policy called a Records Retention Policy explaining how long we keep information for. Files are stored securely and then confidentially destroyed by a third party.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

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 are required by law to pass on some your personal data we collect to: -

- Our Local Authority (LA)
- Department for Education (DfE)
- Trust auditors

We may also share personal information about you with:

- 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
- Survey and research organisations
- Trade unions and associations
- Health and social welfare organisations
- Professional advisers and consultants
- Police forces, courts, tribunals
- Professional bodies
- 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

You have a right to make a 'subject access request' to gain access to personal information that the Trust holds about you.

- 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 our data protection officer.

Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. You have the right to:

- Object to the use of your personal data
- 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
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- 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 the Trust Central Team Office.

To make a complaint, please contact our Data Protection Officer

Angela Corbyn on 07775 436141. Or email dpo@neneeducationtrust.org.uk. Or leave a letter at our offices at the address above.

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 our data protection officer:

Angela Corbyn on 07775 436141. Or email dpo@neneeducationtrust.org.uk. Or leave a letter at our offices at the address above.

Nene Education Trust GDPR queries please contact:-
Emma Morehen, Governance Manager 01933 627082
emma.morehen@neneeducationtrust.org.uk

Document reviewed March 2020