

PRIVACY NOTICE:

Trust Workforce

Schools within the Kennet School Academies Trust (Kennet School, Whitelands Park Primary School and Francis Baily Primary School) are required to hold and process personal data, including sensitive personal data, relating to the Trust's workforce, which includes all those employed to teach, or otherwise engaged to work, either on a paid or contracted basis for the Trust. The Trust acts as the data controller for the purposes of data protection law.

Contact details

Equinox Learning Trust
Stoney Lane, Thatcham, Berkshire RG19 4LL
Telephone: 01635 862121
Email: office@equinoxlearningtrust.co.uk

What type of information do we have?

We currently collect and process the following information:

- 🔒 your name, address and contact details including email address and telephone numbers
- 🔒 your date of birth
- 🔒 your employee or teacher number
- 🔒 your marital status, next of kin, and emergency contacts
- 🔒 details of your bank account and national insurance number
- 🔒 the terms and conditions of your employment
- 🔒 your qualifications, skills, experience and employment history, including start and end dates with previous employers and with the Kennet School Academies Trust
- 🔒 your remuneration package including entitlement to benefits such as pensions
- 🔒 your nationality and entitlement to work in the UK including passport and visa details
- 🔒 details of your schedule (days of work and working hours) and attendance at work
- 🔒 work absences including sickness and the reasons for the absence
- 🔒 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 performance reviews and ratings
- 🔒 your training record
- 🔒 whether or not you have a student loan
- 🔒 information about your criminal record
- 🔒 photographs and video recordings including CCTV
- 🔒 the make, model and registration number of your car
- 🔒 your electronic signature
- 🔒 GP details (applies only if you access the in-house counselling service)

We may also collect, store and use information about you that falls into the 'special category' of more sensitive personal data. This includes information about:

- 🔒 your ethnicity
- 🔒 relevant medical information, including whether or not you have a disability, for which the Trust needs to make reasonable adjustments
- 🔒 your Covid vaccination status if you are attending an overseas trip
- 🔒 biometric information (linked to Kennet School's catering system)

How we collect the information and why we have it

The Trust may collect information in a variety of ways such as through application forms; passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment; from correspondence with you; or through interviews, meetings or other assessments. The Trust will also collect personal data about you from third parties, such as references supplied by former employers or referees supplied by you and information from criminal records checks permitted by law. Safer recruitment procedures in schools also require appropriate checks to be made on people who work with children.

Workforce data is essential for the Trust's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. We will inform you at the point of collection whether you are required to provide certain information to us or if you have a choice in this.

Under GDPR, the lawful bases we rely on for processing this information are:

Contract: The Trust needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract. This information also allows the Trust to build a comprehensive picture of the workforce and how it is deployed and facilitate safe recruitment, as well as enabling you to be paid.

Legal Obligation: In some cases, the Trust needs to process the data to meet the statutory duties placed upon it. For example, it is required to check an employee's right to work in the UK, to deduct tax and to comply with health and safety laws, to enable you to take periods of leave to which you are entitled and to make statutory returns and referrals to the Department of Education.

Legitimate Interest: The Trust processes details of next of kin and their contact information so that it is able to contact employees' families in the event of an emergency. In addition, details relating to employees' cars and their registration numbers allow the Trust to identify vehicles for security and parking purposes.

Consent: The Trust requires your consent to use photographs and videos more publicly to promote the schools through marketing materials, e.g. school displays, school prospectuses, newsletters, the schools' websites, social media and other marketing channels. If you do not want the Trust to use photographs and videos as described above, please let us know by emailing office@equinoxlearningtrust.co.uk.

Your consent is required for the use of your electronic signature which will be collected from the new starter form when you join the Trust and stored securely on the Trust's network in a folder with restricted access. It will be deleted if you leave the employment of the Trust. It will be used for letters only. If it is needed for other uses, such as certificates or postcards, we will ask you again separately. You may withdraw your consent at any time by emailing office@equinoxlearningtrust.co.uk and your signature will be deleted immediately.

Public Task: Taking photographs and videos of pupils is a key part of life in the Trust's schools. Photographs or videos of pupils used for teaching or welfare purposes may occasionally include images of employees. Examples include recording a lesson to help with pupils' learning or photographs for use in an internal exhibition or display. Your photograph will be used on your staff pass and stored on the Trust's Management Information System.

Special Category Data: Ethnicity and disability - The Trust processes personal information about employees' ethnicity and disability to meet its statutory duties in submission of the workforce census for the Department of Education. This is in accordance with Article 9(2)(g) of the GDPR 'Reasons of substantial public interest' and the Data Protection Act 2018 specific substantial interest condition (6) 'statutory and government purposes'.

Health information, where appropriate, including whether or not you have a disability, is collected with the explicit consent of the employee in accordance with Article 9(2)(c) of the GDPR where the Trust may need to protect your vital interests and to allow the Trust to make reasonable adjustments to your working environment.

How we store your information

Data will be stored in a range of different places, including in your personnel file and in the Trust's Management Information System (SIMS).

What we do with the information we have

We do not share information about our workforce members with anyone without consent unless the law and our policies allow us to do so.

Your information may be shared internally within the Trust, including with the Trust's HR and Administrative teams, your line manager and IT staff if access to the data is necessary for the performance of their roles.

The Trust also shares your data with third parties to:

- ① obtain pre-employment references from previous employers and other referees provided by you
- ① obtain employment background checks from third party providers
- ① obtain necessary criminal records checks from the Disclosure and Barring Service
- ① provide references for future employers which may include pay, performance and service information
- ① process travel arrangements for residential school trips abroad (Kennet School only)
- ① connect with suppliers of teaching and learning resources and analysis tools which help to track how well our pupils and the school as a whole are doing
- ① your GP with your permission (applies only if you have accessed the in-house counselling service)
- ① where the disclosure is required to satisfy safeguarding obligations

This data will be subject to confidentiality arrangements.

The Trust will also share your data with the Department for Education, the Department for Work and Pensions and with third parties who process data or undertake a service on its behalf in connection with HR, payroll and occupational health services. Information relating to disqualified employees (including by association) will be shared with Ofsted. Where we are legally required to do so, we will share your personal data with law enforcement and government bodies, for example:

- ① the prevention or detection of crime and/or fraud
- ① the apprehension or prosecution of offenders
- ① in connection with legal proceedings
- ① where the disclosure is required to satisfy our safeguarding obligations
- ① research and statistical purposes, as long as personal data is sufficiently anonymised or consent has been provided

Transferring data internationally

Where we transfer data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law and where you have given us permission to do so, for example, if you wish to work in a country outside of the EEA.

Requesting access to your personal data

Under data protection law, you have rights including:

- ① **Your right of access:** You have the right to ask us for copies of your personal information
- ① **Your right to rectification:** You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete
- ① **Your right to erasure:** You have the right to ask us to erase your personal information in certain circumstances
- ① **Your right to restriction of processing:** You have the right to ask us to restrict the processing of your information in certain circumstances.
- ① **Your right to object to processing:** You have the right to object to the processing of your personal data in certain circumstances
- ① **Your right to data portability:** You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances

You are not required to pay any charge for exercising your rights. If you make a request, we will respond to you within one month of receipt. Please contact us if you wish to make a request: [Data Protection Officer](#).

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you have any questions about how we use your personal data, please let us know: [Data Protection Officer](#).

How to complain

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance: [Data Protection Officer](#). Or you can contact the Information Commissioner's Office:

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Helpline: 0303 123 1113

Website: www.ico.org.uk (*contact page*)