

Privacy Notice for Russell Education Trust Staff

(How we use workforce information including permanent and fixed term employees, consultants, contractors. The information in this Privacy Notice also applies to job applicants for posts at the Russell Education Trust and its schools).

1. Introduction

- a. Under data protection law, individuals have a right to be informed about how an organisation uses any personal data held about them.
- b. This Russell Education Trust ('Trust') Privacy Notice applies to all personal data held by the Trust as a multi-academy trust and by individual schools in the Trust.
- c. This Privacy Notice explains how, during the course of our activities as an academy trust, we will collect, store and process personal data about individuals we employ or otherwise engage to work centrally for the Trust or in the Trust's schools.
- d. The Trust, (The Russell Education Trust, 1 Park Road, Teddington, TW11 OAP), is the 'data controller' for the purposes of data protection law.
- e. Our Data Protection Officer is Jo Townsend (see 'Contact Us' below).

2. The personal data we collect, hold and share include:

- a. We may collect, use, store and share (when appropriate) different categories of personal data about you which include, but is not limited to:
 - Personal and contact details.
 - Banking details.
 - Taxation details.
 - Right to work documentation.
 - Pension Information.
 - Salary and benefits information.
 - Annual leave and absence records.
 - Job application details such as evidence of academic qualifications, employment history.
 - Selection and interview records.
 - References.
 - Identity verification records.
 - Performance management, appraisal, and assessment records.
 - Training records and professional memberships.
 - Investigation records and outcomes of any disciplinary and/or grievance procedures.
 - Data about your use of our schools' IT systems.
 - Records of communications.
 - Sign-in records.
 - Your image captured in photographs or on CCTV.
- b. In some cases, we may also hold more sensitive categories of information about you:
 - Health, medical conditions or disabilities.
 - Occupational health referrals.
 - Religion or belief.
 - Demographic information required for monitoring equal opportunities.
 - Information received from the Disclosure and Barring Service (DBS) such as past criminal convictions and offences or cautions.
 - Trade union affiliation.

3. Why we collect and use this information

- a. Some of the reasons we collect and use this information are to:
 - Inform the recruitment and selection process.
 - Facilitate safe recruitment and fulfil our safeguarding obligations.

Privacy Notice – Staff

Revision Due: August 2025



RUSSELL EDUCATION TRUST

- Enable you to work for us.
- Support you in your work.
- Maintain a safe working environment.
- Enable you to take part in appropriate training and professional development.
- Enable you to be paid your salary and pension and other employment related benefits.
- Administer statutory and contractual leave entitlements such as annual leave, maternity, parental or adoption leave.
- Support effective performance management and conduct pay reviews.
- Deal with disputes and complaints.
- Enable you to use the school's cashless catering systems.
- Inform our recruitment and retention policies.
- Allow better financial modelling and planning.
- Comply with our legal obligations for example, in the field of employment and health and safety.
- Ensure your health, safety and wellbeing and that of our pupils and other staff.
- Enable equalities monitoring.
- Improve the management of workforce data across the sector.
- Support the work of the School Teachers' Review Body.

b. Use of your personal data in automated decision making and profiling

We do not currently process your personal information through any automated decision making or profiling process. This means we don't make any decisions about you using only computers without any human involvement. If this changes in future, we will amend any relevant privacy notices to explain the processing to you, including your right to object to it.

4. Our lawful basis for using this information

- a. We only collect and use your personal data when the law allows us to. We need to establish a lawful basis to do this as set out in data protection law.
- b. Our lawful bases for processing your personal information are most commonly:
 - Fulfil a contract we have entered into with you or to enter into a contract with you for example to ensure you can work in the UK, pay you a salary, keep records of your employment.
 - Comply with a legal obligation such as checking entitlement to work, providing information to HMRC, complying with health and safety legislation, statutory codes of practice and employment protection legislation.
 - Carry out a task in the public interest for our official purposes such as keeping educational records.
 - You have given us your consent to use it in a certain way, for example to use your image in marketing materials.
 - Where it is necessary for our legitimate interests (or those of a third party) and your interests, rights and freedoms do not override those interests for example using it for strategic analysis, modelling and planning.
 - To protect an individual's vital interests (i.e. protect your life or someone else's life) such as giving your details in a medical emergency where it is not possible to obtain your consent or to do so could endanger life.
- c. Where you have provided us with your consent to use your information, you may take back this consent at any time. We will make this clear when requesting your consent and will explain how you would go about withdrawing your consent, in which case, the information about you will no longer be collected or processed.
- d. Special categories of personal data will normally only be processed under the following legal grounds ('special category' information includes information about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health or condition or sexual life, or genetic or Biometric Data)

Privacy Notice – Staff

Revision Due: August 2025



RUSSELL EDUCATION TRUST

- We are legally obliged to collect and use it in the field of employment and social protection law, for example using information about ethnic origin or equality monitoring purposes.
 - We need to protect you or someone else, for example in medical emergencies.
 - We have obtained your specific and explicit consent to use your information in a certain way for example the use of your biometric information to identify you for our catering system.
 - We intend to use it to make or defend legal claims.
 - Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee.
 - Processing is necessary for statistical purposes, for example equal opportunities initiatives.
 - Processing is necessary for reasons of substantial public interest, for example safeguarding children.
- e. Where appropriate, we will collect information about criminal convictions through Disclosure and Barring Service (DBS) checks as part of the recruitment process or we may be notified of such information directly by you in the course of working for us.
- f. We will only use information relating to criminal convictions where the law allows us to do so. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so in accordance with one of the lawful bases listed above.

5. Collecting your information

- a. While in most cases you must provide the personal information we need to collect, there are some occasions where you can choose whether or not to provide the data.
- b. We will always tell you if you have a choice. If you must provide the data, we will explain what might happen if you don't.
- c. Most of the data we hold about you will come from you when you apply for a job or start your employment or we may have asked you for it during the course of your employment. We may also hold data about you from others, such as:
- Employment and recruitment agencies.
 - Your previous employers and referees.
 - Pension scheme providers.
 - HM Revenue and Customs.
 - Disclosure and Barring Service.
 - Police forces, courts, tribunals.
 - Medical professionals.
 - Occupational Health providers.
 - Your representatives.
 - Your family members.

6. Storing your personal data

- a. 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.
- b. We also keep personal information about applicants as part of our recruitment processes.
- c. We also store some of your personal information in our IT systems.
- d. For information on how long we keep your personal data, see our Data Retention Schedule which sets out retention periods for certain categories of personal data such as your recruitment information and job application details, personnel file, appraisals and accident records.
- e. We have security measures in place to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.
- f. We will dispose of personal data securely when we no longer need it.

Privacy Notice – Staff

Revision Due: August 2025



7. Sharing your personal data

- a. We do not share information about you with anyone outside of the Trust without permission from you or unless the law and our policies allow us to do so.
- b. Where we share your personal data with someone who is a supplier or service provider, we will take steps to ensure they treat your personal data in a way that meets data protection law requirements.
- c. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with third parties including but not limited to:
 - Employment and recruitment agencies you have engaged.
 - Central and Local Government bodies such as HMRC, the Department for Education (DfE) – to meet our legal obligations in relation to employment legislation and the requirements of the Trust’s Funding Agreements such as statistical and financial reporting.
 - Our regulator, Ofsted, to comply with our legal obligations under the legislative framework for the monitoring and evaluation and assessment of schools.
 - Police forces, Courts, and Tribunals – fulfilling our legal obligations to share information, prevent crime, comply with Court Orders etc.
 - Our suppliers and service providers such as catering services, IT services, software and online applications, payment providers – to enable them to provide the service we have engaged them for in line with our contractual obligations.
 - Health authorities – to meet our obligations to protect the welfare of the school community.
 - Professional advisors and consultants – providing consultancy to the Trust, to improve outcomes and to support the Trust in the public interest of education.
 - Professional bodies to ensure we can meet legal requirements when employing school staff.
 - Charities and voluntary organisations to ensure we can meet the educational and pastoral needs of the school community.
 - Our internal and external auditors - to meet our legal obligations to have our accounts audited in accordance with legislation.
 - Occupational Health providers – to comply with our legal obligations, to promote equal opportunities and to ensure the safety and wellbeing of our staff.
 - Security organisations – to ensure that our staff and pupils are as safe as possible and to meet our obligations and duties under legislation.
 - Training and professional development organisations who we engage to provide staff training.

8. Transferring data internationally

- a. We do not routinely transfer staff personal data overseas but where this is necessary, we ensure that the appropriate safeguards are in place.
- b. Where we transfer personal data to a country or territory internationally, we will do so in accordance with data protection law.

9. Your rights - How to access personal information that we hold about you.

- a. You have the right to make a ‘subject access request’ to gain access to personal information that we hold about you.
- b. If you make a subject access request, and if we do hold information about you, we will (unless there is a good reason why we shouldn’t):
 - Give you a description of it.

Privacy Notice – Staff

Revision Due: August 2025



RUSSELL EDUCATION TRUST

- 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 have the right for your personal information to be shared electronically with another organisation in certain circumstances.
- If you would like to make a request, please contact us (see “Contact Us” below). You can also read the information set out in the Trust’s Data Protection Policy and the Subject Access guidance on your school’s website.

10. Your other rights regarding your data

- a. Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:
 - object to the use of your personal data if it would cause, or is causing, damage or distress;
 - stop it being used to send direct marketing;
 - object to decisions being taken by automated means (by a computer or machine rather than by a person);
 - have the personal data we hold about you rectified if it is inaccurate or incomplete;
 - restrict our processing of your personal data (i.e. permitting its storage but no further processing);
 - seek redress, either through the Information Commissioner’s Office or through the Courts.
- b. To exercise these rights, please contact us (see “Contact us” below).

11. Complaints

- a. We take any complaints about our collection and use of your 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 let us know first.
- b. To make a complaint, please contact our Data Protection Officer (see “Contact us” below).
- c. 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
 - Write to: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

12. Contact us

- a. If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer:
 - **Data Protection Officer:** Jo Townsend
 - **Email address:** DPO@Russelleducationtrust.org.uk
 - **Address:** Data Protection Officer, The Russell Education Trust, 1 Park Road, Teddington, TW11 OAP. Please mark private and confidential for the attention of the Data Protection Officer.