Hamwic Education Trust & Springdale First School

Workforce Privacy Notice

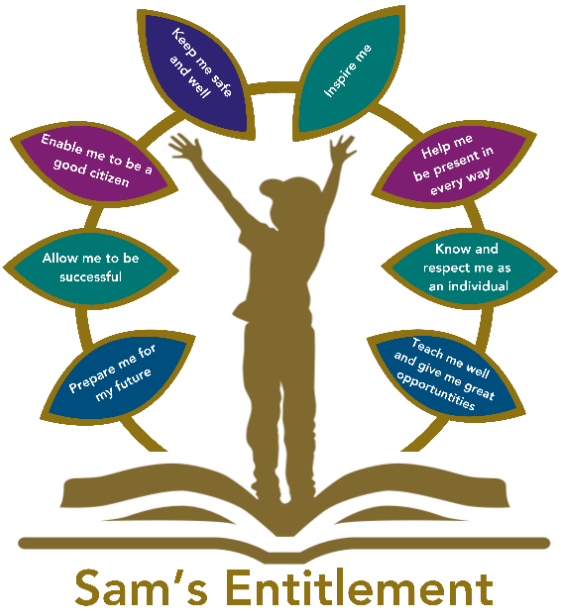
Reviewed on	September 26	Review frequency	Annual
Next review due	September 27	Template Yes / No	Yes
Owner	Head of Safeguarding & Compliance	Approved by	DCEO

1. History of Policy Changes

Date	Page	Change	Origin of Change
Sept 26	5	Expanded workforce data categories to include safer recruitment checks, social media checks and meeting attendance records.	UK GDPR and ICO employment practices guidance.
	6	Added recognised legitimate interests as a lawful basis for employment-related processing activities. Added recognised legitimate interests to processing relating to disputes, workforce management, termination arrangements and IT monitoring.	Data (Use and Access) Act 2025 reforms relating to recognised legitimate interests.
	9	Added new International Transfers of Personal Data section. Updated international transfer safeguards to reference Transfer Risk Assessments and appropriate safeguards.	Data (Use and Access) Act 2025 and UK GDPR overseas transfer requirements.
	10	Added standalone Complaints section.	UK GDPR and Data Protection Act 2018 right to complain to the ICO.
	11	Added links to HET Data Protection Policy and Records Management & Retention Policy.	Improved transparency and accessibility.

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3. Aims

Hamwic Education Trust (HET) believe that all pupils should receive a high quality, enriching, learning experience in a safe and inclusive environment, which promotes excellence through a broad curriculum that prepares them for their future and opens doors to a diverse array of opportunities as well as that all pupils and adults within HET flourish as individuals and together.

4. About this privacy notice

Hamwic Education Trust (HET) is required by law to collect and process personal information about our workforce. We are committed to being transparent about how we collect and use this information and to meet our data protection obligations.

This privacy notice provides you with information about how we collect and process the personal information of our workforce in accordance with the UK General Data Protection Regulation (**UK GDPR**) and the Data Protection Act 2018.

This notice applies to our workforce; this includes current and former employees, workers, contractors, volunteers, and governors/trustees/members.

This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time but, if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical.

5. Who are we?

We are Springdale First School and are part of the Hamwic Education Trust (HET), this a multi-academy trust incorporating a number of different schools. Our registered office is Unit E, The Mill Yard, Nursling Street, Southampton, Hampshire SO16 0AJ and our company number is 10749662.

This privacy notice has been issued on behalf of HET. When we refer to "we", "us", "our" or "the Trust" within this privacy notice, we are referring to Springdale First School which is part of HET. HET is the 'data controller' for the purposes of data protection law and is registered with the Information Commissioner's Office.

HET has appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

6. What data do we collect?

We collect and process a wide range of information about our workforce. This includes:

- Personal information (such as name, date of birth, address, email address, phone numbers, emergency contact details, marital status, and dependants).
- National Insurance number.
- [Personal codes issued by Companies House for our trustees or members].
- Contract information (such as start dates, hours worked, post, roles and salary information, and bank/building society details).
- Bank account details, payroll records, and tax status information.
- Salary, annual leave, pension, and benefits information.

- Details of periods of leave taken by you, including holiday, sickness absence, family leave, and the reasons for the leave.
- Leaving date and your reason for leaving.
- Location of employment or workplace.
- Recruitment information (including copies of right to work documentation, social media checks, safer recruitment checks, references, and other information included in a CV or cover letter or as part of the application process).
- [Application details for trustees or members].
- [Relevant business and pecuniary interests for trustees and members].
- Employment records (including job titles, work history, working hours, holidays, training records, and professional memberships).
- [Governance records (including role, start date, end date, and term of office)].
- Compensation history.
- Performance information.
- Disciplinary and grievance information.
- Information about your use of our information and communications systems.
- Meeting attendance records.
- Photographs.
- CCTV images.
- Details of any other information that is provided to us during the course of our relationship with you.

7. What sensitive data do we collect?

We may also collect, store and use the following more sensitive types of personal information about our workforce including:

- Information about your race or ethnicity, religious beliefs, sexual orientation, and political opinions.
- Trade union membership details.
- Information about your health, including any medical conditions and sickness records, and details of any absences including any statutory leave.
- Information about criminal convictions and offences.

8. Why do we collect this information?

HET/the School may collect this information in a variety of ways; for example, information might be collected through application forms, obtained from your passport or other ID documents, from forms completed by you at the start of or during your employment (such as benefit nomination forms), from correspondence with you, and/or through interviews, meetings or assessments.

HET/the School may also collect information about you from third parties, such as from references from your former employer, information from employment background check providers, information from publicly available social media accounts, information from credit reference agencies, and information from criminal records checks permitted by law.

9. Why do we collect and use this information?

We have set out below a description of all the ways we plan to use workforce information and which of the legal bases we rely on to do so. We may process workforce information for more than one lawful basis depending on the specific purpose for which we are using your information.

Purpose/activity	Type of information	Lawful basis for processing information
To make a decision about your recruitment or appointment.	Contact details and personal details. Qualifications and experience. Rates of pay. Recruitment information.	Performance of a contract.
To verify your identity.	Contact details and personal details. National Insurance number. Companies House personal codes.	Necessary to comply with our legal obligations.
To determine the terms on which you work for us.	Contact details and personal details. Qualifications and experience. Rates of pay. Recruitment information.	Performance of a contract.
To ensure you are legally entitled to work in the UK.	Contact details and personal details. Recruitment information.	Necessary to comply with our legal obligations.
To pay you and, if you are an employee, to deduct tax and National Insurance contributions.	Contact details and personal details. National Insurance details. Bank, payroll and tax details.	Necessary to comply with our legal obligations. Performance of a contract.
To provide benefits to you.	Contact details and personal details. Employment records or terms of service.	Performance of a contract.
To enrol you in a pension arrangement in accordance with our statutory automatic enrolment duties.	Contact details. National Insurance details.	Necessary to comply with our legal obligations. Performance of a contract.
To administer the contract into which we have entered with you.	Contact details and personal details. Employment records or terms of service.	Necessary to comply with our legal obligations. Necessary for our legitimate interests to run the Trust/School, provision of our IT services, network security, to prevent fraud, and in the context of a business reorganisation or group restructuring exercise.
For HET/School management and planning, including accounting and auditing.	Contact details and personal details. Employment records or terms of service.	Necessary for our legitimate interests to run the Trust/School and manage our workforce.

	Salary or payment details.	
To conduct performance reviews, managing performance and determining performance requirements.	Contact details and personal details. Employment records or terms of service.	Performance of a contract. Necessary for our legitimate interests to run the Trust/School and manage our workforce.
To gather evidence for possible grievance or disciplinary hearings.	Contact details and personal details. Employment records or terms of service. Performance information. CCTV.	Necessary to comply with our legal obligations. Performance of a contract. Necessary for our legitimate interests of handling disputes.
To deal with legal disputes involving you or other employees, workers and contractors including accidents at work.	Contact details and personal details. Employment records or terms of service. Performance information. CCTV.	Necessary to comply with our legal obligations. Performance of a contract. Necessary for a recognised legitimate interest. Necessary for our legitimate interests of handling disputes.
To make decisions about your continued employment or engagement.	Contact details and personal details. Employment records or terms of service. Performance information.	Necessary for a recognised legitimate interest. Necessary for our legitimate interests to run our business and manage our workforce.
To make arrangements for the termination of our working relationship.	Contact details and personal details. Employment records or terms of service. Performance information.	Performance of a contract. Necessary for a recognised legitimate interest. Necessary for our legitimate interests to run our business and manage our workforce.
For education, training, and development requirements.	Contact details and personal details. Employment records or terms of service. Performance information. Training records.	Necessary to comply with our legal obligations. Performance of a contract.
To monitor your use of our information and communication systems to ensure compliance with our safeguarding and data security policies.	Contact details and personal details. Details of ICT use. CCTV.	Necessary to comply with our legal obligations. Necessary for a recognised legitimate interest. Necessary for our legitimate interests to run the Trust/School, the provision of IT services and ensure network security.
To ensure network and information security, including preventing unauthorised access to our computer and electronic communication systems, and preventing	Contact details and personal details. Details of ICT use. CCTV.	Necessary for our legitimate interests to run the Trust/School, the provision of IT services and ensure network security.

malicious software distribution.		
To conduct data analytics studies to review and better understand employee retention and attrition rates.	Contact details and personal details. Rates of pay. Recruitment information. Employee records.	Necessary for our legitimate interests to better understand our workforce.

10. Why do we collect and process sensitive information?

Purpose/activity	Type of information	Lawful basis for processing information
To administer benefits including statutory maternity pay and statutory sick pay.	Contact details and personal details. National Insurance number. Bank, payroll and tax details. Health and medical information.	Necessary to comply with our legal obligations. Schedule 1, Part 1, (1) Data Protection Act 2018 - Employment Purposes.
To ascertain your fitness to work.	Contact details and personal details. Health and medical information. Occupational health records.	Necessary to comply with our legal obligations. Schedule 1, Part 1, (1) Data Protection Act 2018 - Employment Purposes.
To manage sickness absence.	Contact details and personal details. Health and medical information. Occupational health records.	Necessary to comply with our legal obligations. Schedule 1, Part 1, (1) Data Protection Act 2018 - Employment Purposes.
To comply with health and safety obligations.	Contact details and personal details. Health and medical information. Occupational health records.	Necessary to comply with our legal obligations. Schedule 1, Part 1, (1) Data Protection Act 2018 - Employment Purposes.
To make reasonable adjustments.	Contact details and personal details. Health and medical information. Occupational health records.	Necessary to comply with our legal obligations. Schedule 1, Part 1, (1) Data Protection Act 2018 - Employment Purposes.
To ensure your suitability for work.	Contact details and personal details. Health and medical information. Occupational health records. Criminal offence and conviction data.	Necessary to comply with our legal obligations. Schedule 1, Part 1, (1) Data Protection Act 2018 - Employment Purposes.
To ensure meaningful equal opportunities monitoring and reporting.	Information about your race or national or ethnic origin; religious, philosophical, or moral beliefs; and/or your sexual life or sexual orientation.	Necessary for the performance of a task in the public interest. Schedule 1, Part 2, (8), Data Protection Act 2018 - Equality of opportunity or treatment.

To pay trade union premiums, register the status of a protected employee, and to comply with employment law obligations.	Contact details and personal details. Trade union membership.	Necessary to comply with our legal obligations. Schedule 1, Part 1, (1) Data Protection Act 2018 - Employment Purposes.

11. Storing personal information

We keep workforce information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of personal information are set out in our [data retention policy] and are available upon request. After this period, we will securely destroy or anonymise personal information in accordance with data protection law.

12. Who do we share information with?

We routinely share workforce information with:

- Our local authority.
- The Department for Education.
- Examining bodies.
- Ofsted.
- Law enforcement agencies.
- Courts and tribunals.
- Other schools within HET.
- Our auditors, insurers, and other professional advisers.
- Health and social welfare organisations.
- Occupational health providers.
- Other third parties we may engage the services of for the purposes of providing a public task or the administration of the Trust/School; for example, our safeguarding monitoring software, and/or our management information system provider.
- Other third parties to whom we may choose to transfer or merge parts of the Trust/School or our assets. Alternatively, we may seek to acquire other trusts, schools or academies or merge with them. If a change happens to the Trust/School, then the new management team may use your personal information in the same way as set out in the privacy notice.

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:

- To comply with our legal obligations.
- In connection with legal proceedings (or where we are instructed to do so by court order).

13. International transfers of personal data

Your personal information may be transferred outside the UK and the European Economic Area (EEA), including to the United States. Where information is transferred outside the UK or EEA to a country that is not designated as “adequate” in relation to data protection law, the information is adequately protected by conducting a transfer risk assessment to ensure that security measures and other appropriate safeguards are in place to protect your information. For more information on international transfers please contact us at the details below.

14. Your rights

Data protection law gives you certain rights about how your information is collected and used. To make a request for your personal information, please the Data Compliance Officer (DCO) in the school; see contact details in section 17.

Under data protection law, you also have the following rights:

- The right to be informed about the collection and use of your personal information - this is called “right to be informed”.
- The right to ask us for copies of the personal information we have about you - this is called “right of access”; this is also known as a subject access request (SAR), data subject access request, or right of access request.
- The right to ask us to change any information you think is not accurate or complete - this is called “right to rectification”.
- The right to ask us to delete your personal information - this is called “right to erasure”.
- The right to ask us to stop using your information - this is called “right to restriction of processing”.
- The “right to object to processing” of your information in certain circumstances.
- Rights in relation to automated decision making and profiling.
- The right to withdraw consent at any time (where relevant).
- The right to complain to the Information Commissioner's Office if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it; for example, some rights will not apply:

- Right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- Right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task, or legitimate interests.
- Right to object does not apply when the lawful basis for processing is contract, legal obligation, or vital interests, and if the lawful basis is consent, you don’t have the right to object, but you have the right to withdraw consent.

15. Withdrawal of consent

Where we are processing your personal information with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal information, please let us know by contacting the Data Compliance Officer (DCO) in the school.

16. Complaints

If you have a concern about the way we are collecting or using your personal information, you have the right to make a complaint to us.

Any complaints relating to data protection must be directed to the HET Data Protection Officer (DPO), Gemma Carr, Deputy CEO. See contact details below, section 17.

Data protection complaints will be dealt with in accordance with the procedure set out in our data protection policy.

If you remain dissatisfied with our response, you can make a complaint directly to the Information Commissioner's Office at Make a complaint about how an organisation has used your personal information | ICO.

17. Contact

If you have any questions about this privacy notice or the way in which we use your personal information, please contact the Trust's Data Protection Officer (DPO), Gemma Carr, Deputy CEO.

Email: compliance@hamwic.org

Telephone: 023 8078 6833.

Address: Hamwic Education Trust, Unit E, The Mill Yard, Nursling Street, Southampton, Hampshire SO16 0AJ.

18. Link to HET policies

- HET Data Protection Policy
- HET Records Management and Retention Policy