

Privacy Notice for Staff – How we use your information

2026/27

Who are we?

The Arden Forest C of E Multi Academy Trust is the 'organisation responsible for your information (data controller)'. This means the Trust is responsible for how your personal information is processed and for what purposes.

Arden Forest C of E Multi Academy Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: ZA415063

You can contact the Academy Trust as the Data Controller in writing at AFMdatacontact@welearn365.com

What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our staff.

What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

What personal information do we process about staff?

The Trust collects, holds and processes personal information relating to current, former and prospective employees, agency workers, casual workers, volunteers, governors, trustees and contractors where appropriate.

The categories of personal information we process include:

- **Personal information**, such as your name, address, contact details, date of birth, National Insurance number and emergency contact details.
- **Employment information**, including your contract, job title, working pattern, salary, pension membership and employment history.
- **Recruitment information**, including application forms, references, qualifications, employment history, identity documents and right to work information.
- **Safer recruitment information**, including Disclosure and Barring Service (DBS) checks, prohibition checks, Section 128 checks and other pre-employment checks where required.

- **Payroll, pension and financial information**, including bank account details, tax information and pension contributions.
- **Attendance and employment records**, including sickness absence, leave, flexible working arrangements, appraisal, disciplinary, grievance and capability records.
- **Training and professional development information**, including qualifications, mandatory training and Continuing Professional Development (CPD).
- **Health and wellbeing information**, including occupational health information, reasonable adjustments and workplace risk assessments where appropriate.
- **Equality monitoring information**, where voluntarily provided or required by law.
- **IT, security and access information**, including user accounts, system access logs, CCTV and building access records where appropriate.
- **Governance information**, such as declarations of interests and gifts and hospitality declarations where required.

We may also process special category personal information and criminal offence information where permitted by law and necessary to fulfil our legal obligations or employment responsibilities.

For what purposes do we use personal information?

We use staff information to:

- recruit, appoint and retain employees and other members of the workforce;
- administer contracts of employment and other working arrangements;
- pay salaries, pensions and other employment-related benefits;
- manage payroll, tax and statutory deductions;
- fulfil our legal obligations as an employer;
- undertake safer recruitment and safeguarding checks;
- maintain the Single Central Record and other statutory records;
- support staff attendance, health, wellbeing and occupational health;
- administer leave, flexible working and other employment-related requests;
- support performance management, appraisal, capability, disciplinary and grievance processes;
- provide training, professional development and career progression opportunities;
- communicate with staff and manage the day-to-day operation of the Trust;
- ensure the security of our people, premises, systems and information;
- monitor equality, diversity and inclusion;
- support workforce planning, financial planning and school improvement;
- respond to complaints, legal claims and regulatory investigations where necessary; and
- fulfil statutory reporting requirements, including the School Workforce Census.

Collecting staff information

Most of the personal information we process is provided directly by you during the recruitment process and throughout your employment with the Trust.

We may also receive personal information from third parties where appropriate, including previous employers, referees, recruitment agencies, occupational health providers, the Disclosure and Barring Service (DBS), the Teaching Regulation Agency (TRA), the Department for Education (DfE), HM Revenue & Customs (HMRC), pension providers and other organisations where we are required or permitted to do so by law.

We only collect and process personal information that is necessary for employment, safeguarding, legal, contractual or operational purposes, in accordance with UK data protection legislation.

What are the legal reasons for us to process your personal information?

The Trust processes personal information in accordance with UK data protection legislation. We will only collect, use and share personal information where there is a lawful basis for doing so.

The lawful bases we rely on are explained below. Examples of the types of information we process, the purposes for processing and who we may share information with are set out in the tables that follow.

1. To comply with a legal obligation

In many circumstances, we are required by law to process personal information in order to meet our responsibilities as an employer and as an education provider.

This includes complying with employment, safeguarding, education, health and safety, equality, tax and pension legislation, together with statutory reporting requirements.

Examples of processing carried out under this lawful basis are set out in **Table 1**.

2. To protect vital interests

We may process personal information where it is necessary to protect someone's life or prevent serious harm.

This is most likely to occur in medical emergencies or other situations where immediate action is required to protect the health, safety or welfare of staff or others.

Examples of processing carried out under this lawful basis are set out in **Table 2**.

3. With your consent

In some circumstances, we will ask for your consent before processing your personal information.

Where we rely on consent, we will explain why the information is needed and how it will be used. You may withdraw your consent at any time, although this will not affect any processing carried out before consent was withdrawn.

Examples of processing carried out under this lawful basis are set out in **Table 3**.

4. To perform a public task

As a publicly funded education provider, the Trust carries out functions in the public interest.

We process personal information where it is necessary to deliver education, support staff in carrying out their roles, manage the day-to-day operation of the Trust and fulfil our wider public responsibilities.

Examples of processing carried out under this lawful basis are set out in **Table 4**.

5. To fulfil our contract with you

We process personal information where it is necessary to fulfil our contractual obligations as your employer or to take steps at your request before entering into an employment contract.

Examples of processing carried out under this lawful basis are set out in **Table 5**.

Processing special category personal information

Some of the personal information we process is classed as special category personal information because it is more sensitive and requires additional protection.

The Trust will only process special category personal information where UK data protection legislation permits us to do so. This includes where processing is necessary:

- with your explicit consent;
- to meet our obligations or exercise our rights under employment, social security or social protection law;
- to protect your vital interests or those of another person;
- for reasons of substantial public interest;
- for occupational health or medical purposes;
- to establish, exercise or defend legal claims; or
- where otherwise permitted by law.

The relevant lawful bases for processing special category personal information are identified within the tables below.

Who might we share your information with?

We only share personal information where it is lawful, necessary and proportionate to do so. Depending on the purpose, we may share information with:

- the Department for Education (DfE) and other government departments where required by law;
- local authorities, including Warwickshire County Council and other local authorities where appropriate;
- HM Revenue & Customs (HMRC);
- Teachers' Pension Scheme (TPS), Local Government Pension Scheme (LGPS) and pension administrators;
- the Teaching Regulation Agency (TRA), Disclosure and Barring Service (DBS) and other safeguarding bodies where appropriate;
- payroll providers, finance systems and banking providers;
- occupational health providers, Employee Assistance Programme providers and healthcare professionals where appropriate;
- legal advisers, HR advisers, auditors, insurers and regulators, including Ofsted, the Education and Skills Funding Agency (ESFA) and the Information Commissioner's Office (ICO);
- IT, cloud hosting and technical support providers;
- communication and collaboration platforms, including Microsoft 365;
- training providers, professional bodies and awarding organisations;
- recruitment providers and recruitment platforms;
- Health and Safety advisers and emergency services where necessary;
- contractors and service providers who process personal information on behalf of the Trust under appropriate contractual arrangements.

We do not share information about our staff unless the law or our policies allow us to do so.

Please refer to the tables below for examples of the types of personal information that may be shared for different purposes.

A full list of the Trust's data processors and service providers is available on request from the Trust's Data Protection Officer.

Data collection requirements

The Trust is required to provide information about its workforce to the Department for Education (DfE) as part of statutory data collections, including the School Workforce Census, in accordance with the Education (Supply of Information about the School Workforce) (England) Regulations 2007, as amended.

The information we provide supports the Department for Education in carrying out its statutory functions, including workforce planning, funding, policy development and the monitoring of education provision.

Further information about the School Workforce Census and the data collected is available on the Department for Education website.

What do we do with your information?

All personal information is held securely and processed in accordance with UK data protection legislation.

Personal information is only used for the purposes for which it was collected, unless there is a lawful reason to use it for another compatible purpose.

The Trust will only share personal information with third parties where there is a lawful basis to do so.

How long do we keep your information for?

All personal data is stored in line with the Trust's Data Protection Policy and Record Retention Schedule.

Records are securely destroyed or anonymised once the applicable retention period has expired.

Transferring data internationally

Where personal data is processed by suppliers outside the UK, appropriate safeguards are in place, such as adequacy regulations or approved international data transfer agreements, in accordance with UK data protection legislation.

Where appropriate, we undertake transfer risk assessments before personal information is transferred internationally.

What are your rights in relation to your personal information?

Under UK data protection legislation, you have the right to:

- request access to the personal information we hold about you;
- request that inaccurate or incomplete personal information is corrected;
- request the deletion of your personal information where applicable;
- request that we restrict the processing of your personal information in certain circumstances;
- object to the processing of your personal information where the law allows;
- request the transfer of your personal information to another organisation where applicable;
- withdraw your consent at any time where we rely on consent as the lawful basis for processing;
- and
- complain to the Information Commissioner's Office (ICO).

The Trust does not make decisions about staff based solely on automated processing or profiling.

If you wish to exercise any of your rights or request access to your personal information, please contact:

Data Protection Lead

Arden Forest C of E Multi Academy Trust
AFMdatacontact@welearn365.com
or

School Data Protection Officer

Warwickshire Legal Services
Email: schooldpo@warwickshire.gov.uk
Alternatively, you may write to:
School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

If your request relates to a particular school within the Trust, please tell us which school it concerns.

Data Protection Complaints

We are committed to handling personal information fairly, transparently and in accordance with UK data protection legislation.

If you are dissatisfied with how the Trust has collected, used or shared your personal information, you may make a data protection complaint.

We encourage you to use the Trust's **Data Protection Complaint Form**, available from the Trust and each school, as this will help us investigate your concerns efficiently. Alternatively, you may submit your complaint by email or in writing.

Please send your complaint to:

Data Protection Lead

Arden Forest C of E Multi Academy Trust
Email: **AFMdatacontact@welearn365.com**
or

School Data Protection Officer

Email: **schooldpo@warwickshire.gov.uk**
Please provide as much information as possible about your concern, including the school (where applicable), the circumstances of your complaint and the outcome you are seeking.

What happens next?

Once we receive your complaint:

- we will acknowledge receipt within **30 calendar days**;
- we may contact you if we need further information;
- we will investigate your concerns fairly and objectively;
- we will keep you informed where appropriate; and
- we will provide you with a written response explaining the outcome of our investigation and any actions we have taken.

If you remain dissatisfied

If, after receiving our final response, you remain dissatisfied with how we have handled your complaint, you have the right to complain to the Information Commissioner's Office (ICO).

Information Commissioner's Office

Website: www.ico.org.uk

Telephone: **0303 123 1113**

Review

Next review: July 2027 or sooner if legislation changes.

Data Tables:

The tables below set out the types of processing carried out by the Arden Forest C of E MAT and lawful reasons for doing so. The tables provide examples of the main categories of personal information processed by the Trust. They are not intended to be an exhaustive list, and additional processing may take place where permitted or required by law.

Table 1 – Personal information we are required to process to comply with the law:

Purpose	Information we may use	Lawful basis	Typical recipients
Maintain employment records and comply with statutory employment requirements	Personal details, employment information, qualifications, right to work, DBS and other pre-employment checks	Legal obligation	Department for Education (where required), Disclosure and Barring Service (DBS), Teaching Regulation Agency (TRA), Ofsted, HMRC, Payroll Provider
Complete the School Workforce Census and other statutory returns	Staff identity, role, contract details, qualifications and workforce information	Legal obligation	Department for Education
Statutory equality monitoring and reporting	Equality monitoring information, including ethnicity where collected	Legal obligation	Department for Education
Meet health and safety responsibilities	Accident records, incident reports, health and safety records	Legal obligation	Health and Safety Executive (HSE), insurers, local authority where required
Maintain statutory safeguarding records	Safer recruitment information, Single Central Record, right to work information	Legal obligation	Ofsted, DBS, Teaching Regulation Agency, other safeguarding bodies where appropriate
Respond to statutory complaints or regulatory investigations	Information relevant to the complaint or investigation	Legal obligation	Ofsted, regulators and other statutory bodies where required
Meet employment, equality and health and safety obligations	Occupational health reports, reasonable adjustments and workplace health information	Legal obligation	Occupational health providers where appropriate

Table 2 – Personal information we are required to process as it is necessary to protect someone's vital

interests

Purpose	Information we may use	Lawful basis	Typical recipients
Respond to medical emergencies	Medical information, allergies, medical conditions and emergency treatment information	Vital interests	NHS, Ambulance Service, hospitals and healthcare professionals
Protect the health and safety of staff and others during emergencies	Emergency contact details, medical information and Personal Emergency Evacuation Plans (PEEPs), where required	Vital interests	Emergency services, first aid trained staff and other members of staff who need the information in an emergency
Support staff on educational visits and off-site activities	Medical information, allergies and emergency contact information required to support staff whilst undertaking educational visits or residential activities	Vital interests	Visit leaders, first aid trained staff and emergency services where required

Table 3 - Personal information we are required to process with the consent of the individual to whom that information 'belongs' - Please note, you have the right to withdraw your consent for us to process your data in this way at any time.

Purpose	Information we may use	Lawful basis	Typical recipients
Promote the Trust and its schools	Staff photographs and video recordings used in newsletters, websites, social media, prospectuses and other promotional material	Consent	Parents, the Trust and school community, local media and the general public where appropriate
Publish staff profiles or biographies	Professional profile information published for communication or promotional purposes	Consent	Trust and school websites, newsletters and promotional publications

Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task. You have the right to object or restrict processing that is carried out for the purposes of Public Task – However, please note that this is not an absolute right and would only apply in certain circumstances.

Purpose	Information we may use	Lawful basis	Typical recipients
Manage the day-to-day operation of the Trust	Staff meeting attendance, mandatory training attendance, work contact details and internal communications	Public task	Not routinely shared externally
Support staff performance, development and school improvement	Appraisal records, professional development records, qualifications and training records	Public task	Training providers and professional bodies where appropriate
Monitoring equality, diversity and inclusion within the Trust	Equality monitoring information where collected	Public task	Department for Education and other organisations where required by law

Purpose	Information we may use	Lawful basis	Typical recipients
Communicate with parents and the wider school community	Work contact details, staff names, job titles and professional profiles published as part of a member of staff's role	Public task	Parents, carers, pupils and the Trust community where appropriate
Obtain professional HR advice	Information relevant to the employment matter	Public task	HR advisers
Provide staff with access to Trust systems and protect information security	User accounts, system access information, work email addresses and audit logs	Public task	IT support providers and cloud service providers where appropriate
Promote good governance and manage conflicts of interest	Declarations of interests, gifts and hospitality declarations	Public task	Trust governance, auditors and regulators where appropriate

Table 5 - Personal information we are required to process because of a contract we have with you or because you have asked us to take specific steps before entering into a contract

Purpose	Information we may use	Lawful basis	Typical recipients
Recruit employees and undertake pre-employment checks	Application forms, CVs, interview notes, references, qualifications and identity documents, right to work information and other pre-employment checks	Contract	Recruitment providers, referees and professional bodies where appropriate
Administer your contract of employment	Personal details, contact information, contract details, job title, working pattern and contractual changes	Contract	Not routinely shared externally
Pay salaries and administer employment-related benefits	Payroll information, bank details, tax information, pension contributions and salary information	Contract	Payroll provider, HMRC, Teachers' Pension Scheme (TPS), Local Government Pension Scheme (LGPS)
Administer leave and other contractual entitlements	Attendance records, leave records, flexible working arrangements and family leave information	Contract	Payroll provider where appropriate
Manage contractual changes	Changes to hours, role, salary, location or other contractual terms	Contract	Payroll provider and pension administrators where appropriate