



ENDEAVOUR LEARNING TRUST
STAFF DATA PRIVACY STATEMENT

1 INTRODUCTION

- 1.1 Endeavour Learning Trust (“the Trust”) is committed to protecting the privacy and security of its staff personal information. This Staff Privacy Statement provides you with important information about what, how, where, why and when the Trust collects and processes your personal data.
- 1.2 This statement should be read in conjunction with our Data Protection Policy which contains more generalised information about our data protection procedures.
- 1.3 The Trust is what is known as the ‘Controller’ of the personal data you provide to us or which we collect from third parties about yourself. This means that Trust is responsible for deciding what personal data (information) we gather and how we hold and use it.
- 1.4 The Trust is registered with the Information Commissioner’s Office (ICO).
Registration number ZA462273.
- 1.5 The Trust processes staff personal data in accordance with data protection law. This includes the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- 1.6 This statement applies to the personal information of all staff employed by the Trust including all its schools and extended services (e.g. Endeavour Community and West Lancashire Sports Partnership). By staff this statement refers to both full and part time employees, contractors, trainees, consultants and temporary or agency workers.
- 1.7 This statement also outlines how the Trust will use personal data relating to any prospective employees relating to job applications, including both internal and external applicants.
- 1.8 This notice does not form part of your contract of employment or any other contract to provide services.

2 WHAT IS PERSONAL DATA?

- 2.1 Personal data is any information that ‘relates to’ an identified or identifiable individual. It includes information relating to you, from which we can identify you directly or indirectly (e.g. because it includes your name).
- 2.2 It also includes information relating to you, from which you cannot be directly identified, if you can be identified from that information when it is used in combination with other information we hold about you.
- 2.3 Personal data can include information relating to you that has been ‘pseudonymised’, meaning that any information that directly or indirectly identifies you (e.g. your name) is removed and replaced with one or more artificial identifiers or pseudonyms (e.g. staff or application reference).
- 2.4 However, truly anonymous data, or data that has had any identifying information permanently removed from it, does not count as personal data.
- 2.5 When considering whether information ‘relates to’ you for the purposes of data protection legislation, we consider a range of factors, including the content of the information, the purpose or purposes for which we are processing it, and the likely impact or effect of that processing on you.

3 WHAT IS ‘PROCESSING’?

- 3.1 Any activity that involves the use of your personal data is referred to as processing (or process). It includes:



- 3.1.1 Obtaining, recording or holding personal data (e.g. asking you to complete personnel forms, application forms or performing a DBS criminal record check);
- 3.1.2 Carrying out any operation or set of operations on personal data such as organising, amending, retrieving, using, disclosing, erasing or destroying it (e.g. recording relevant information on your personnel file, or maintaining pay records); and
- 3.1.3 Transmitting or transferring personal data to third parties (e.g. transferring payroll data to HMRC).

4 WHAT TYPES OF PERSONAL DATA DO WE COLLECT & PROCESS?

- 4.1 Any activity that involved the use of personal data is referred to as 'processing'. The Trust processes many different categories of staff information. This may include:
 - 4.1.1 personal identifiers and contacts (such as name, contact details and address);
 - 4.1.2 characteristics (e.g. ethnicity);
 - 4.1.3 contract information (including salary information)
 - 4.1.4 work absence (attendance) information
 - 4.1.5 qualifications (level)
 - 4.1.6 medical information
 - 4.1.7 personal development plans; and
 - 4.1.8 continuous professional development (training)
 - 4.1.9 publicly available sources including online resources (e.g. social media).
 - 4.1.10 Application form and information determining eligibility to work in line with UK Employment Law and Safeguarding.

5 HOW DO WE COLLECT PERSONAL DATA?

- 5.1 Most of the personal data the Trust collects is provided to us directly by you.
- 5.2 Most of the information you provide to us is mandatory, however, some will be requested on a voluntary basis. In order to comply with data protection legislation, 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.

6 HOW DO WE USE PERSONAL DATA?

- 6.1 Most of the personal data relating to its workforce the Trust processes is provided to us directly by you for one of the following reasons;
 - 6.1.1 To enable a comprehensive picture of the workforce and how it is deployed.
 - 6.1.2 to improve the management of the Trust's employees
 - 6.1.3 to inform the development of recruitment and retention policies
 - 6.1.4 to communicate with you in connection with your employment and role
 - 6.1.5 to understand how your physical or mental health may be relevant to your work
 - 6.1.6 to keep appropriate records required by law and/or employment law purposes
 - 6.1.7 to monitor your performance or conduct
 - 6.1.8 to enable you to be paid; and
 - 6.1.9 to enable the monitoring of selected protected characteristics.
 - 6.1.10 To enable financial modelling and planning



- 6.2 The Trust also receives personal information indirectly, with the following sources;
- 6.2.1 His Majesty's Revenue and Customs (HMRC);
 - 6.2.2 The Disclosure and Barring Service (DBS);
 - 6.2.3 Medical professionals; and
 - 6.2.4 Referees during the recruitment process
- 7 **LAWFUL BASIS (INCLUDING CRIMINAL OFFENCE DATA)**
- 7.1 We collect and use your information under the General Data Protection Regulation (UK GDPR) as well as employment law and Safeguarding requirements. The lawful reasons that we can process your data are:
- 7.1.1 Article 6.1a – consent (in limited circumstances);
 - 7.1.2 Article 6.1c – processing is necessary for compliance with a legal obligation to which we are subject; or
 - 7.1.3 Article 6.1e – processing is necessary for the performance of a task carried out in the public interest.
- 7.2 We also process special categories of personal data which includes Criminal Offence Data as part of the recruitment process (e.g. when we conduct a standard or enhanced DBS criminal record check). We also may be notified from time to time of a criminal offence data in the course of employment (e.g. when you have been suspected to have committed a crime, or if you report a criminal conviction to us).
- 7.3 We will use Criminal Offence Data we hold in the following ways:
- 7.3.1 To determine whether your criminal record (i.e. the results of a standard or enhanced DBS check) impacts upon your suitability to be offered employment;
 - 7.3.2 To consider whether any criminal charges, prosecutions or convictions (including cautions you accept) that occur during your employment warrant impact upon your continued suitability for your role, and/or must be reported by us to our insurers, or to regulatory authorities (e.g. the Teaching Regulation Agency)
 - 7.3.3 Where it is relevant, in the context of a disciplinary or grievance process;
- 7.4 We will only collect and process criminal conviction data if it is appropriate given the nature of the role, and where we have a lawful basis to do so. This will usually be where processing is necessary to carry out our obligations. We have in place an appropriate policy document and safeguards that we are required by law to maintain when processing criminal conviction data (please see our Data Protection Policy for further details).
- 7.5 We may process criminal offence data and some special category data in accordance with the conditions set out in Schedule 1 Data Protection Act 2018. The conditions include, but are not limited to:
- 7.5.1 For the purpose of employment, social security and social protection law
 - 7.5.2 Consent
 - 7.5.3 Counselling
 - 7.5.4 Preventing and detecting an unlawful act



- 7.5.5 Safeguarding children
- 7.5.6 Preventing fraud
- 7.5.7 Equality of opportunity or treatment

8 **PROCESSING THE PERSONAL DATA OF THIRD PARTIES**

- 8.1 In some limited circumstances, and for specified purposes, we will also process personal data relating to third parties, such as your next of kin and/or dependants. For example, we may need to process their personal data for the purposes of administering any insurance and pension survivor benefits they may be entitled to or in an emergency situation. Where this occurs, we may contact your next of kin and/or dependants separately to explain why we need to process their personal data.

9 **HOW DO WE STORE YOUR PERSONAL DATA?**

- 9.1 The Trust stores staff data for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please see our data retention policy on the Trust's or School's website.
- 9.2 We have in place appropriate security measure to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, alternated or disclosed.

10 **WHO DO WE SHARE YOUR PERSONAL DATA WITH?**

- 10.1 The Trust does not share personal information with anyone without consent unless the law and (if applicable) our policies allow us to do so.
- 10.2 The Trust will routinely share your information with:
 - 10.2.1 Third parties engaged as our processors such as a cloud-based service or consultants engaged in a particular task (e.g. HR Access System, pension administrators, Occupational Health providers, insurers, legal advisers or auditors)
 - 10.2.2 the local authority;
 - 10.2.3 the police and other statutory bodies such as DBS and TRA (Teacher Regulation Authority);
 - 10.2.4 Government Departments (Education (DfE); Work & Pensions; Ofsted)
 - 10.2.5 The public insofar as it a requirement to make known your role and engagement in the operation of the school or Trust (e.g. SENDCo or Headteacher name); and
 - 10.2.6 within our Multi Academy Trust.
- 10.3 We may also share your personal data with third parties as directed by you.

11 **WHERE IN THE WORLD IS YOUR PERSONAL DATA TRANSFERRED TO?**

- 11.1 If any of our processing activities require your personal data to be transferred outside the UK or European Economic Area, we will only make that transfer if:
 - 11.1.1 the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;
 - 11.1.2 we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient;



- 11.1.3 the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
- 11.1.4 you explicitly consent to the transfer.

12 CHANGES TO YOUR PERSONAL DATA

- 12.1 It is important that the personal data we hold about staff is accurate and current. Please keep us informed if your personal information changes during your time at the Trust by contacting the HR department or your line manager.

13 YOUR DATA PROTECTION RIGHTS

- 13.1 Under data protection law, you have rights, including;
 - 13.1.1 **Right to be informed** – about how and why your data is being used.
 - 13.1.2 **Right of access** – you have the right to ask us for copies of your personal information;
 - 13.1.3 **Right to rectification** – you have the right to ask us to rectify personal information you think is inaccurate or to ask us to complete information;
 - 13.1.4 **Right to erasure** – you have the right to ask us to erase your personal information in certain circumstances;
 - 13.1.5 **Right to restriction of Processing** – you have the right to object to the Processing of your personal information in certain circumstances;
 - 13.1.6 **Right to data portability** – you have the right to ask that we transfer the personal information we hold about you to another organisation.
 - 13.1.7 **Right to not to be subject to a decision based solely on automated processing** – for decisions that have a have a legal or similarly significant effect on individuals.
- 13.2 You are not required to pay any charge for exercising your rights. If you make a request we must respond in one month.
- 13.3 Please contact the school directly or Catherine White, Data Protection Officer, 01772 817904, c.white@endeavourlearning.org, if you wish to make a request on

14 HOW TO COMPLAIN OR WITHDRAW CONSENT

- 14.1 If you have any concerns about our use of your personal information, wish to exercise your rights in relation to your Personal Data, or make a complaint, please let us know by contacting the Data Protection Officer, Catherine White, if you wish to make a request on 01772 817904 / c.white@endeavourlearning.org
- 14.2 You can also complain to the Information Commissioner's Officer (ICO) if you are unhappy with how we have used your data. Tel: 0303 123 1113 (Mon to Fri 9am to 5pm) <https://ico.org.uk/concerns>.

15 CHANGES TO THIS DATA PRIVACY STATEMENT

- 15.1 We keep our practices and policies regarding the collection, Processing and security of Personal Data under continual review and may update them from time to time. We therefore reserve the right to change this Data Privacy Statement at any time. We will notify you of any changes made at the appropriate time and may re-issue a new Data Privacy Statement if appropriate.

Reviewed: Spring 2025