Workforce Privacy Notice

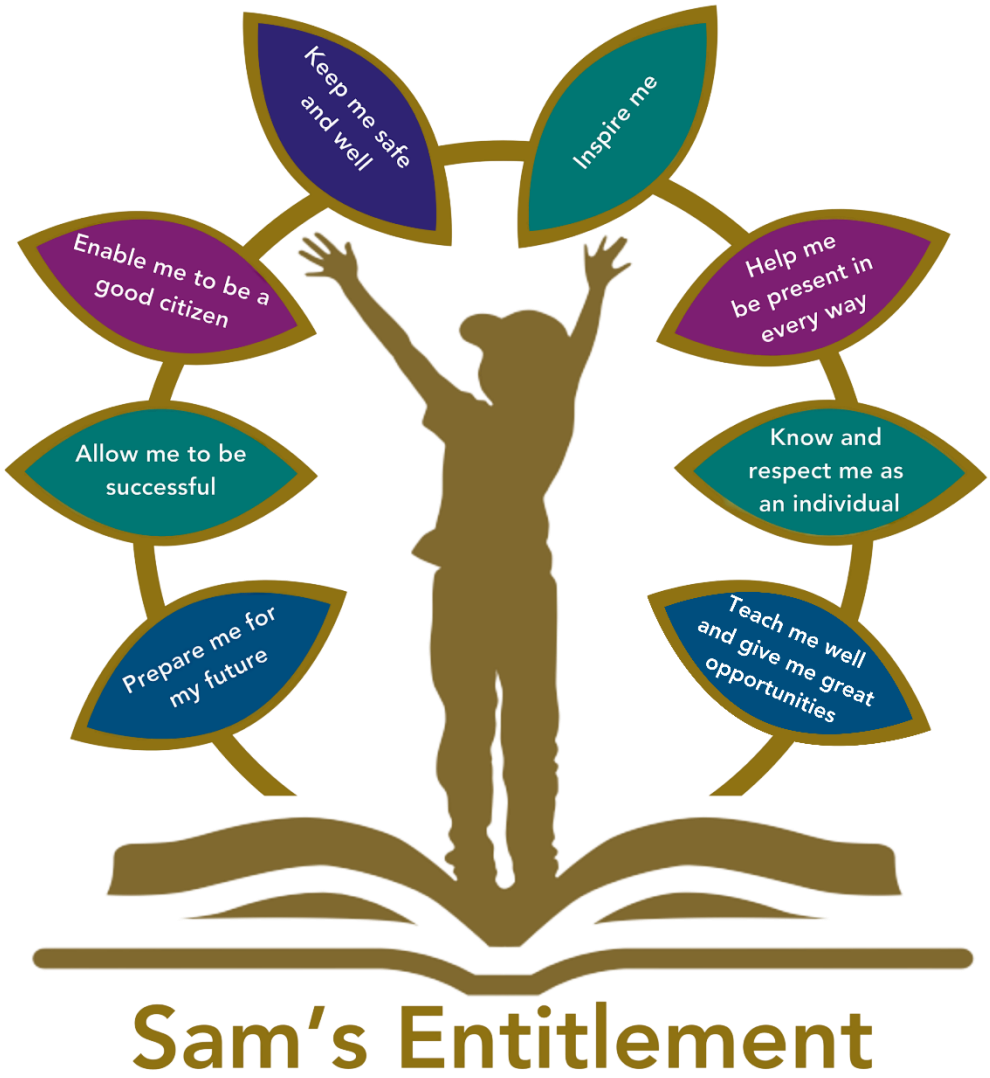
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1. History of Policy Changes

Date	Page	Change	Origin of Change

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3. Introduction

We are the Hamwic Education Trust (HET). Our registered office is Unit E, The Mill Yard, Nursling Street, Southampton, Hampshire SO16 0AJ and our company number is 10749662. 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.

4. Scope

Hamwic Education Trust (HET) is required by law to collect and process personal information about our pupils and staff. 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 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. What data to 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, 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, 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, term of office.
- Compensation history.
- Performance information.
- Disciplinary and grievance information.
- Information about your use of our information and communications systems.
- Photographs.
- CCTV images.
- Details of any other information that is provided to us during the course of our relationship with you.

6. What sensitive data do we collect?

- We may also collect, store and use the following more sensitive types of personal information 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, details of any absences including any statutory leave.
- Information about criminal convictions and offences.

7. How do we collect this information?

HET 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, forms completed by you at the start of or during your employment (such as benefit nomination forms), from correspondence with you, through interviews, meetings or assessments.

HET 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.

8. 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

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
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, we have entered into with you	Contact details and personal details Employment records or terms of service	Performance of a legal obligation Necessary for our legitimate interests to run the Trust provision of our IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise
For HET management and planning, including accounting and auditing	Contact details and personal details Employment records or terms of service Salary or payment details	Necessary for our legitimate interests to run HET and manage our workforce
To conduct performance reviews, managing performance and determining performance requirements	Contact details and personal details Employment records or terms of service	Performance information Necessary for our legitimate interests to run the Trust 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 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 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 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	Contact details and personal details	Necessary to comply with our legal obligations

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
communication systems to ensure compliance with our safeguarding and data security policies	Details of ICT use CCTV	Necessary for our legitimate interests to run the Trust, 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 malicious software distribution	Contact details and personal details Details of ICT use CCTV	Necessary for our legitimate interests to run the Trust, the provision of IT services and ensure network security
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

9. Why do we collect and process sensitive information?

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

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
To administer benefits including statutory maternity pay, 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	Necessary to comply with our legal obligations

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
	Occupational health records	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, 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

10. 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 Records and Retention Schedule and is available upon request. After this period, we will securely destroy or anonymise personal information in accordance with data protection law.

11. Who do we share information with?

- We routinely share workforce information with:
- Our local authority
- The Department for Education and/or EFSA
- Examining bodies
- Ofsted
- Law enforcement agencies
- Courts and tribunals
- Other HET schools
- 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 HET, for example our safeguarding monitoring software, our management information system provider
- Other third parties to whom we may choose to transfer or merge parts of HET or our assets. Alternatively, we may seek to acquire other trusts, schools or academies or merge with

them. If a change happens to HET, 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).

12. 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 contact our Data Protection Officer by emailing compliance@hamwic.org.

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 your 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 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 haven't the right to object, but you have the right to withdraw consent.

If you have a concern about the way we are collecting or using your personal information, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at Make a complaint about how an organisation has used your personal information | ICO.

13. 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.

14. 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.