Privacy Statement – Staff Data - FI12(C)

Three Counties Academy Trust (TCAT)

Effective Date: Academic year 2026-2027
Last Reviewed: October 2nd 2026

1. Introduction

Three Counties Academy Trust, commonly referred to as TCAT, is committed to protecting the privacy and security of personal data. This privacy statement explains how we collect, use, and share staff data across all schools within TCAT in compliance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

TCAT is the **Data Controller** for the personal data held by our schools unless otherwise stated. Each school within TCAT follows this privacy statement to ensure consistency in data protection practices.

2. What Data We Collect

We collect, store, and process the following categories of staff data:

- **Personal Information** – Name, title, date of birth, gender, National Insurance number, and employee ID
- **Contact Information** – Home address, email address, phone numbers
- **Employment Records** – Job title, employment contract, start date, working hours, salary, benefits, pension details, performance appraisals, disciplinary and grievance records
- **Qualifications and Training** – Academic and professional qualifications, training records, CPD participation
- **Right to Work Information** – Passport details, visa documentation, and other legal right to work evidence
- **Financial Information** – Bank details for salary payments, tax, and National Insurance contributions
- **Emergency Contact Details** – Next of kin and emergency contacts provided by the staff member
- **Safeguarding and Welfare Information** – Criminal record checks (DBS), safeguarding referrals, and welfare records where applicable
- **Medical and Health Information** – Occupational health records, disability and accessibility requirements, sickness absence records

- **Photographs and Video** – For identification, security, event participation, and staff directories (with consent where required)
- **CCTV Footage** – If staff are present at TCAT schools where CCTV is in operation

3. Why We Collect and Use Staff Data

We process staff data under the following lawful bases as defined under UK GDPR:

- **Legal Obligation (Article 6(1)(c))** – To comply with employment, tax, and safeguarding laws
- **Public Task (Article 6(1)(e))** – To carry out tasks in the public interest, such as providing education and maintaining a safe learning environment
- **Legitimate Interests (Article 6(1)(f))** – Where processing is necessary for the Trust's operations, balanced against staff rights
- **Contractual Obligation (Article 6(1)(b))** – To fulfil employment contracts, including salary and benefit administration
- **Consent (Article 6(1)(a))** – For certain voluntary activities such as marketing communications or event photography

Additionally, if we process **special category data** (e.g., health, criminal records), we rely on **Article 9(2)(b)** and **(g) UK GDPR**, as processing is necessary for employment, safeguarding, or legal obligations.

4. How We Use Staff Data

We use staff data for the following purposes:

- To administer payroll, pensions, and employment benefits
- To comply with statutory reporting obligations (e.g., HMRC, Teachers' Pension Scheme)
- To maintain accurate employment and training records
- To monitor attendance, performance, and professional development
- To manage safeguarding and child protection responsibilities
- To fulfil contractual employment obligations
- To provide support for staff well-being and occupational health
- To ensure health and safety compliance
- To manage access control, security, and safeguarding measures (e.g., DBS checks, visitor logs, CCTV monitoring)
- To communicate with staff regarding employment matters and Trust initiatives

5. How We Store and Protect Staff Data

We take the security of staff data seriously and use the following measures to protect it:

- **Physical Security** – Secure storage of paper records in locked areas
- **Technical Security** – Encrypted databases, password-protected systems, and secure cloud storage
- **Organisational Measures** – Staff training, clear data policies, and regular audits to ensure compliance

We only retain staff data for as long as necessary in line with our **Records Management Policy**, which follows guidance from the **Information and Records Management Society (IRMS) Schools Toolkit**.

6. Who We Share Staff Data With

We only share staff data when necessary and lawful, including with:

- **Department for Education (DfE)** – To meet statutory reporting requirements
- **Local Authorities** – For safeguarding, education workforce monitoring, and employment-related functions
- **HM Revenue & Customs (HMRC)** – For tax, National Insurance, and pension processing
- **Teachers' Pension Scheme (TPS) / Local Government Pension Scheme (LGPS)** – For pension administration
- **Disclosure and Barring Service (DBS)** – For safeguarding and criminal record checks
- **Health and Occupational Services** – For staff well-being and workplace adjustments
- **Law Enforcement Agencies** – If required for legal compliance or safeguarding concerns
- **School Service Providers** – Such as payroll providers, IT support, and HR systems
- **Educational Research Organisations** – Where approved and compliant with data protection laws

All third parties we share data with must comply with strict data protection agreements.

7. International Data Transfers

We do not routinely transfer staff data outside the UK. If we do, we ensure adequate safeguards are in place, such as **UK adequacy decisions** or **Standard Contractual Clauses (SCCs).**

8. Staff Rights

Under UK GDPR, staff members have the following rights regarding their personal data:

- **Right to Be Informed** – About how we use their data
- **Right of Access** – To request a copy of their personal data
- **Right to Rectification** – To correct inaccurate or incomplete data
- **Right to Erasure ("Right to Be Forgotten")** – In certain circumstances, to request data deletion
- **Right to Restrict Processing** – To limit how data is used
- **Right to Data Portability** – To request data in a transferable format (where applicable)
- **Right to Object** – To processing based on legitimate interests
- **Rights Related to Automated Decision-Making** – We do not use staff data for automated decisions

To exercise any of these rights, please contact the **Data Protection Officer (DPO)** (details below).

9. Contact Details

For any questions about this privacy statement or to exercise your rights, please contact:

N Cook Data Protection Officer
on behalf of Three Counties Academy Trust
Schools DPO, c/o PSB jubilee House, Townsend Lane, London, NW9 8TZ
Email: nicola@schoolsdpo.com
Tel: 01296 658502

If you have concerns about how your data is handled, you can also contact the **Information Commissioner's Office (ICO):**

ICO Website: www.ico.org.uk
ICO Helpline: 0303 123 1113

10. Changes to This Privacy Statement

We may update this privacy statement from time to time. Any significant changes will be communicated via our website and school communications