David Ross Education Trust

Broadening Horizons

Privacy Notice – Staff

Document Management Information

Applicable to:	All staff in all Academies and Central Support Services including individuals employed by the Trust, contractors and agency staff. All Members and Trustees.
Dissemination:	The Privacy Notice will be available to staff via the Trust's Policy Centre.
Implementation:	Applicable to all DRET academies
Training:	On request
Review Frequency:	The Privacy Notice will be reviewed every three years and earlier if required due to changes in legislation, statutory guidance, regulatory guidance or Trust practice.
Policy Author:	George Selby, Head of Data Protection and Compliance
Executive Policy Owner:	Maria Maltby, Director of Governance
Approval by:	Level 3 - Executive
Approval Date:	19 October 2026
Next Review Due:	October 2029

Revision History

Document version	Description of Revision	Date Approved
V0.1	Version for review by Executive Directors	May 2020
V1.0	Approved version	22 June 2020
V1.1	Amended to reflect Brexit and change from GDPR to UKGDPR	21 Jan 2021
V1.2	Updated to include National Insurance information	6 June 2023
V1.3	Review	19 October 2026

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1. Introduction

1.1 Under data protection law, individuals have a right to be informed about how the Trust and its Academies use any personal data that is held about them. We, the David Ross Education Trust, comply with this right by providing Privacy Notices to individuals where we are processing their personal data.

1.2 This Privacy Notice applies to staff, workers, contractors, agency staff, Members and Trustees where the Trust processes personal data about them. It explains what information we hold, why we use it, who we may share it with, how long we keep it and the rights individuals have under data protection law.

2. Document Purpose

2.1 The purpose of this Privacy Notice is to explain, in clear terms, how the Trust collects, uses, stores, shares and protects personal data about individuals we employ or engage to work at our Academies and within Central Support Services.

3. Definitions

3.1 **Trust** means all Academies within the David Ross Education Trust, as well as Head Office and central services operations.

3.2 **Executive Leadership Team** means the Chief Executive Officer ("CEO") and the direct line management reports of the CEO (the "Directors").

4. Privacy Notice - Staff

4.1 Data Controller and Processors

4.2 DRET is the Data Controller for the purposes of data protection law and determines the purposes and means of processing personal data. Academies and Central Support Services process personal data as part of the Trust. Where the Trust uses third-party suppliers to process personal data on its behalf, those suppliers act as Data Processors and must only process personal data in accordance with the Trust's instructions and appropriate contractual safeguards.

4.2.1 The postal address of the Trust is:

David Ross Education Trust
Charnwood College
Thorpe Hill
Loughborough
Leicestershire
LE11 4SQ

4.2.2 The Trust's Data Protection Officer is George Selby.

4.2.3 The Trust will ensure that your personal data is processed fairly and lawfully, is accurate, is kept secure and is retained for no longer than is necessary.

4.3 The Categories of Personal Data DRET Holds

4.3.1 We process data relating to those we employ or engage to work at our Academies and within Central Support Services. Personal data that we may collect, use, store and share, where appropriate, includes but is not limited to:

- Personal information, including name, employee or teacher number, contact details, date of birth, marital status, next of kin and emergency contact numbers.
- Contract information, such as start dates, hours worked, post, roles, salary information, annual leave, and pension and benefits information.
- Financial information, such as bank account details, payroll records, National Insurance number and tax status information.
- 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.
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships.
- Performance information, such as capability and outcomes of any disciplinary and/or grievance matters.
- Work absence data, such as number of absences and reasons.
- IT access information, including data about your use of the school's information and communications system.
- Census information relevant to the School Work Force Census.

- Other records, including copies of driving licences, photographs and CCTV footage.

4.3.2 We may also collect, store and use information about you that falls into special category data under UK GDPR. Special category data is more sensitive and receives additional protection. This may include information about:

- Race, ethnicity, religious beliefs.
- Sexual orientation and political opinions.
- Trade union membership.
- Health, including any medical conditions, and sickness records.
- Genetic or biometric data.
- Criminal offence information, including DBS checks, barred list checks, safeguarding concerns and information relating to alleged offences, where this is necessary for safer recruitment, safeguarding, employment or legal purposes.

4.4 Why DRET uses this Data

4.4.1 The purpose of processing this data is to help the Trust and its Academies deliver outstanding education, including to:

- Enable individuals to be paid.
- Facilitate safe recruitment, as part of our safeguarding obligations towards students.
- Support effective performance management.
- Inform our recruitment and retention policies.

- Allow better financial modelling and planning.
- Enable ethnicity and disability monitoring.
- Improve the management of workforce data across the sector.
- Support the work of the School Teachers' Review Body.

4.5 Our Lawful Basis for Using this Data

4.5.1 We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you.
- Comply with a legal obligation in the field of employment, social security and social protection law.
- Carry out a task in the public interest, such as the delivery of education or in the area of public health.
- Process special category data where this is necessary for employment, social security and social protection law, reasons of substantial public interest, safeguarding, health and safety, occupational health, equalities monitoring, or the establishment, exercise or defence of legal claims.
- Process criminal offence data where this is authorised by law and necessary for safer recruitment, safeguarding, employment checks, regulatory compliance or legal claims.

4.5.2 Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way - for example to use your biometric data for the provision of catering services.
- We need to protect your vital interests (or someone else's interests).
- We have legitimate interests in processing the data - for example, where we might use personal information in relation to hiring out a sports facility in order to raise funds for the school.
- It is required for the establishment, exercise or defence of legal claims, or whenever courts are acting in their judicial capacity.

4.5.2.1 Where we rely on consent, we will explain what we are asking consent for and how consent can be withdrawn. More detail is contained in the Trust's Data Protection Policy.

4.5.3 Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the Trust's use of your data.

4.6 Collecting Information

4.6.1 Whilst the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us. Whenever we seek to collect information from you, we will make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

4.7 How DRET Stores the Data

4.7.1 The Trust creates and maintains an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

4.7.2 Personal data will not be retained by the Trust for longer than is necessary for the purpose for which it was collected. Retention periods vary depending on the type of record and any legal, regulatory, safeguarding, employment or operational requirements. Once your employment or engagement with us has ended, we will retain and delete information in accordance with our Records Retention Policy, which can be found at https://sites.google.com/dret.co.uk/gdpr/home.

4.8 Data Sharing

4.8.1 We do not share personal information about you with any third party without your consent unless the law and our policies allow us to do so.

4.8.2 Where it is legally required, or necessary and proportionate for the purposes described in this Privacy Notice, we may share personal information about you with the following categories of recipients:

- The Local Authority - to meet our legal obligations to share certain information about our workforce members, such as safeguarding concerns.
- The Department for Education - to meet our legal obligations. This data sharing underpins workforce policy monitoring, evaluation, links to Academy funding / expenditure and the assessment of education attainment.
- Your family or representatives - in case of emergencies such as a health matter.
- Other schools, academies, education providers or relevant education bodies where this is necessary for employment, education, safeguarding or operational purposes.
- Our regulator, Ofsted - to enable it to evaluate the education we provide in the public interest.
- Suppliers and service providers to enable them to provide the service we have contracted them for, such as our payroll provider.
- Disclosure and Barring Service - for the purpose of carrying out checks on your suitability for work with children.
- HMRC, to provide identity, pay, tax and National Insurance information in relation to legal obligations affecting the Trust and staff.
- Pension providers, including the Teachers' Pension Scheme (TPS) and Local Government Pension Scheme (LGPS), to ensure contributions, pension records and entitlements are administered correctly.
- Benefits, salary sacrifice or wellbeing providers, where you have chosen to participate in a relevant scheme and sharing your details is necessary to administer it.
- Our auditors - we share financial data, which includes salary information with auditors as part of a legal obligation to have our accounts audited.

- Health and social welfare organisations - to enable us to comply with our duty of care and statutory safeguarding duties.
- Police forces, courts, tribunals - in order to uphold law and order.

4.9 Transferring Data Internationally

4.9.1 Where we transfer personal data to a country or territory outside the UK, we will do so in accordance with UK data protection law. This may include relying on UK adequacy regulations, appropriate safeguards such as the International Data Transfer Agreement or UK Addendum, or another permitted legal mechanism.

4.10 CCTV

4.10.1 At Trust Head Office and at our Academies CCTV is operated on site. This is considered necessary to protect staff and students' safety and/or Trust property.

4.11 Biometric Data

4.11.1 At some Academies, a biometric recognition system may be used, for example for the purchase of food in the canteen. Biometric data used to uniquely identify an individual is special category data and will be processed in accordance with UK GDPR, the Data Protection Act 2018 and, where relevant, the Protection of Freedoms Act 2012.

4.11.2 Explicit written consent will be obtained before biometric data is taken and used where consent is relied upon. Individuals will be told how the system works, what alternatives are available, and how consent can be withdrawn.

4.11.3 More information about biometric data and biometric recognition is available from the Information Commissioner's Office.

4.12 Staff Rights

4.12.1 Under data protection law, individuals have rights in relation to their personal data. These rights may include the right to:

- Ask for access to your personal information.
- Ask for rectification of the information we hold about you.
- Ask for the erasure of information about you.
- Data portability i.e. have your personal information transmitted electronically to another organisation in certain circumstances.
- Object to us processing your information.
- Object to direct marketing, where applicable, and object to decisions being taken solely by automated means in certain circumstances.

4.13 How to Access Personal Information we Hold About you

4.13.1 Individuals have a right to make a Subject Access Request to gain access to personal information that the Trust or Academy holds about them. If you want to make a request, please contact your Academy Data Champion in the first instance or ask your Principal.

4.13.2 If you make a Subject Access Request and we do hold the requested information about you, we will:

- Give you a description of it.
- Tell you why we are holding and processing it, and how long we will keep it for.
- Explain where we got it from, if not from you.
- Tell you who it has been, or will be, shared with.
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this.
- Give you a copy of the information in an intelligible form.
- Respond without delay and within one month of receipt of the request.

4.13.3 More information regarding Subject Access Requests is detailed in the Trust Data Protection Policy.

4.13.4 **Exercising Your Rights**

4.13.5 To exercise any of these rights, please contact your Academy Data Champion in the first instance or the Trust's Data Protection Officer. We will consider requests in accordance with data protection law and explain the outcome.

4.14 Complaints

4.14.1 We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or you have any other concern about our data processing, please raise this with the DPO in the first instance.

4.14.2 Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at https://ico.org.uk/concerns
- Call 0303 123 1113.
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

4.15 Contact Details

4.15.1 If you have any questions, concerns or would like more information about anything mentioned in this Privacy Notice please contact our DPO, details below:

- Data Protection Officer, David Ross Education Trust, Dataprotection@dret.co.uk