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| **Author(s):** | Mel Jacob |
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We process personal data relating to those we employ to work at, or otherwise engage to work at our school. This is for employment purposes to assist in the running of the school and / or to enable individuals to be paid. We are also required to hold information on staff to fulfil our legal obligations to the Department for Education and the Local Authority in the submission of an annual School Census. In addition, we hold information in order to support staff as part of the process of continuous professional development and to enable us to contact staff or their next of kin in the event of an emergency.

## Who is responsible for this information?

EQUA Mead Learning Trust is the Data Controller for the use of personal data in this privacy notice.

The categories of workforce information that we process include:

- Personal information (such as name, employee or teacher number, national insurance number)
- Characteristics information (such as gender, age, ethnic group)
- Contract information (such as start dates, hours worked, post, roles and salary/payroll information)

- Work absence information (such as number of absences and reasons)
- Qualifications (and, where relevant, subjects taught)
- Personnel Information (such as Recruitment, Induction, Appraisal, HR documentation, Risk Assessments)
- Medical Information (pre-employment checks, such as allergies, medical conditions, Occupational Health reports)
- Safeguarding information (such as Allegation of a CP nature, including where the allegation is unfounded)

This list is not exhaustive. A data asset register is maintained, and this can be accessed upon request.

## Purpose - why we collect and use this information

We use school workforce data to:

- Enable the development of a comprehensive picture of the workforce and how it is deployed (Legal Basis: Legitimate Interest)
- Inform the development of recruitment and retention policies (Legal Basis: Legitimate Interest)
- Enable individuals to be paid (Legal Basis: Contract)
- As part of our safeguarding duties (Legal Basis: Legal Obligation)
- As part of our obligation to complete an annual school census return to the DfE. (Legal Basis: Public Interest)

## The lawful basis on which we use this information

Under the General Data Protection Regulation (GDPR), the lawful basis we can rely on for processing workforce information are:

- Consent: the individual has given clear consent to process their personal data for a specific purpose
- Contract: the processing is necessary for a contract we have with an individual, or because we have been asked to take specific steps before entering into a contract
- Legal Obligation: the processing is necessary in order to comply with the law (not including contractual obligations)
- Vital Interests: the processing is necessary to protect someone's life
- Public Task: the processing is necessary in order to perform a task in the public interest and official functions, and the task or function has a clear basis in law
- Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests

We collect and use 'special categories of personal data' under the following 'lawful basis' as defined within the GDPRs:

- Article 9(2)(a): where you have understood the reason for us requesting the data and have given your consent to us doing so for the purpose specified
- Article 9(2)(b): where processing is necessary for the purposes of carrying out the obligations in the area of social protection law
- Article 9(2)(c): that processing is necessary to protect the vital interests of you or of another person where you are physically or legally unable to give consent
- Article 9(2)(d): that processing is carried out in the course of our legitimate activities, with appropriate safeguards
- Article 9(2)(h): processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of an employee, medical

diagnosis, the provision of health or social care, or treatment or the management of health or social care systems and services

Under the General Data Protection Regulations (GDPR), the lawful basis we rely on for processing workforce information are:

For the purposes of a) and b) as identified above, in accordance with the legal basis of Legitimate Interest: collecting the data is necessary to perform tasks that schools are required to perform, as part of their statutory function.

For the purposes of c) as identified above, in accordance with the legal basis of Contract: the processing is necessary for an employment contract we have with an individual, or because we have been asked to take specific steps before entering into a contract.

For the purposes of d) as identified above, in accordance with the legal basis of Legal Obligation: the processing is necessary in order to comply with the law.

For the purpose of e) as identified above, in accordance with the legal basis of Public Interest: to fulfil our duties as a public authority to report to the LA and the DfE.

## Collecting workforce information

We collect personal information via, for example, application / recruitment forms, data collection sheets, and staff contract forms.

Workforce data is essential for the school's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with GDPR, 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 and we will tell you what you need to do if you do not want to share this information with us.

## Storing workforce data

We hold data securely for the set amount of time shown in our data retention schedule. Information regarding our data retention schedule and how we keep your data safe can be supplied upon request. We hold and retain school workforce data in line with our legal obligations under:

- The Education Act 1996
- Section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments
- Keeping Children Safe in Education
- The requirements of the Disclosure and Barring Service and the Home Office
- The requirements of HMRC
- The Act of Limitation (1980)
- With reference to the Information Record Management Society which specifies time periods for retention

## Sharing workforce information

We routinely share workforce information with:

- Relevant Local Authorities
- The Department of Education
- Within the Trust
- Pension Authorities (for example Teachers Pension Scheme, and Local Government Pension Scheme)

- The Trust's Payroll provider
- The Trust's Occupational Health provider
- The Trust's insurance provider
- The Trust's external auditors / accountants

## Why we share workforce information

We do not share information about our workforce members with anyone without consent unless the law and our policies allow us to do so. We share information as follows:

### Within the Trust

We share personal data with schools within the Trust for workforce planning purposes.

### Pension authorities

We share personal data / information with our Pension Authorities, for employee pension purposes.

### Payroll provider

We share personal data / information with our payroll provider, for employee salary / payroll purposes.

### Occupational Health provider

We share personal data / information with our Occupational Health provider for employee recruitment and wellbeing systems.

### Insurance provider

We share personal data / information with our insurance providers, for the Trust to support the provision of staffing cover.

### External auditors and accountants

We share personal data / information with our External Auditors and Accountants in order to comply with the DfE's statutory requirements.

### Local Authorities

We are required to share information about our workforce members with our Local Authority (LA) under Section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

### Department for Education

The Department for Education collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our workforce with the (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

## Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information please contact the School Business Manager / Data Protection Officer.

Depending on the lawful basis above, you may also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress

- Prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed
- Seek redress, either through the ICO, or through the courts

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance.

Alternatively, you can contact the Information Commissioner's Office at https://ico.org.uk/concerns/.

## Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data 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 data, please let us know by contacting the School Business Manager.

## Last updated

We may need to update this Privacy Notice periodically so we recommend that you revisit this information from time to time. This version was last updated in April 2026.

## Contact

If you would like to discuss anything in this privacy notice, please contact the School Business Manager at your school.