

Four Hills Education Trust

Registration Reference: ZB928089

Privacy Notice: For School Workforce

This privacy notice explains how Four Hills Education Trust collects, stores, and uses personal data about individuals we employ, or who otherwise engage to work at our schools. 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 as soon as reasonably practical.

1. Who We Are and Our Responsibilities

Our trust, Four Hills Education Trust, is the 'data controller' for the purposes of UK data protection law¹. This means we are responsible for deciding how we hold and use your personal information².

We comply with data protection law and principles, which means your data will be:

- Used lawfully, fairly, and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

2. The Personal Data We Hold About You

We may collect, use, store, and share (when appropriate) various types of personal data about you. This includes, but is not restricted to:

- **Personal Identifiers:** Name, contact details, date of birth, marital status, and gender.
- **Emergency Contacts:** Next of kin and emergency contact numbers.
- **Financial & Employment Data:** Salary, annual leave, pension and benefits information, bank account details, payroll records, National Insurance number, and tax status information.
- **Recruitment & Qualifications:** Copies of right to work documentation, references, application forms, qualifications, employment history, job titles, working hours, training records, and professional memberships.
- **Performance & Conduct:** Performance information and outcomes of any disciplinary and/or grievance procedures.
- **Absence Data:** Sickness and other absence records.
- **Identification & System Usage:** Copies of identity and address evidence, and information about your use of our information and communications systems, equipment, and facilities (e.g., school computers/laptops).

We may also collect, use, store, and share (when appropriate) 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- **Health Information:** Information about any health conditions you have that we need to be aware of.

- **Visual Data:** Photographs and CCTV images captured in school.
- **Trade Union Membership:** Information about trade union membership.

Additionally, we may collect, use, store, and share information about criminal convictions and offences. We may also hold data about you that we have received from other organisations, including other schools, local authorities, and the Disclosure and Barring Service.

3. Why We Use This Data

We collect and use your data for the following purposes:

- To enable you to be paid.
- To check your entitlement to work in the UK.
- To determine the terms on which you work for us.
- To facilitate safe recruitment, as part of our safeguarding obligations towards pupils.
- To support effective performance management.
- To inform our recruitment and retention policies.
- To allow better financial modelling and planning.
- To enable equalities monitoring.
- To improve the management of workforce data across the sector.
- To support the work of the School Teachers' Review Body.
- To ensure our information and communications systems, equipment, and facilities (e.g., school computers) are used appropriately, legally, and safely.
- To ascertain your fitness to work and manage sickness absence.

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, where this is required or permitted by law.

3.1. Use of Your Personal Data for Marketing Purposes

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes, or services that may be of interest to you. You can withdraw consent or 'opt out' of receiving these communications at any time by selecting the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

3.2. Use of Your Personal Data in Automated Decision-Making and Profiling

We do not currently process any staff members' personal data through automated decision-making or profiling (i.e., making decisions solely by automated means without any human involvement or evaluating certain things about an individual through those means). If this changes in the future, we will amend any relevant privacy notices to explain the processing to you, including your right to object to it.

3.3. Use of Your Personal Data for Filtering and Monitoring Purposes

While you are in our school, we may monitor your use of our information and communication systems, equipment, and facilities (e.g., school computers). We do this to:

- Comply with health and safety and other legal obligations.

- Comply with our policies (e.g., child protection policy, IT acceptable use policy) and our legal obligations.
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s).
- Protect your welfare.

4. Our Lawful Basis for Using This Data

Under UK data protection law, we must have a lawful basis for processing personal data. Our lawful bases for processing your personal data for the purposes listed in section 3 above are as follows:

- **Public Task:** Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the school, such as fulfilling our statutory function as a school.
 - *Example Legislation/Guidance:* [List any relevant legislation or guidance that applies, e.g., Education Act 1996, School Teachers' Pay and Conditions Document].
- **Legal Obligation:** Processing is necessary for us to comply with a legal obligation to which the school is subject.
 - *Example Legislation/Guidance:* Health and Safety at Work etc. Act 1974, Safeguarding guidance.
- **Contract:** Processing is necessary for the performance of a contract with you or to take steps at your request before entering into a contract.
- **Consent:** Where you have provided us with consent to use your personal data for a specific purpose. You may withdraw this consent at any time, and we will explain how to do so when requesting your consent.
- **Vital Interests:** Processing is necessary to protect your or another individual's vital interests (e.g., in a life-or-death situation).
- **Legitimate Interests:** Where there is a minimal privacy impact and we have a compelling reason to process your data, such as:
 - Maintaining efficient HR records, ensuring IT security for network integrity.

4.1. Our Basis for Using Special Category Data and Criminal Offence Data

For 'special category' data (e.g., health information, trade union membership), we only collect and use it when we have both a lawful basis (as set out above) and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way.
- We need to perform or exercise an obligation or right in relation to employment, social security, or social protection law.
- We need to protect your vital interests (i.e., protect your life or someone else's life), in situations where you are physically or legally incapable of giving consent.
- The data concerned has already been made manifestly public by you.
- We need to process it for the establishment, exercise, or defence of legal claims.
- We need to process it for reasons of substantial public interest as defined in legislation.
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law.

- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law.
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest.

For criminal offence data, we will only collect and use it when we have both a lawful basis (as set out above) and a condition for processing as set out in UK data protection law⁶⁷. Conditions include:

- We have obtained your consent to use it in a specific way.
- We need to protect your vital interests, in situations where you are physically or legally incapable of giving consent.
- The data concerned has already been made manifestly public by you.
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise, or defence of legal rights.
- We need to process it for reasons of substantial public interest as defined in legislation.

5. Collecting This Data

We will only collect and use your data when the law allows us to. While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily. 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.

Most of the data we hold about you will come directly from you, but we may also hold data about you from:

- Local authorities.
- Government departments or agencies.
- Police forces, courts, or tribunals.

6. How We Store This Data

We keep personal information about you while you work at our school. We may also keep it beyond your employment at our school if this is necessary to comply with our legal requirements or to meet our regulatory requirements.

Our record retention schedule / records management policy sets out how long we keep information about staff. You can request a copy of this document by contacting us.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. We will dispose of your personal data securely when we no longer have a legal requirement to retain it.

7. Who We Share Data With

We do not share information about you with any third party without consent unless the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with UK data protection law), we may share personal information about you with⁸⁶:

- **Our Local Authority**, Telford & Wrekin Council. To meet our legal obligations to share certain information with it, such as safeguarding concerns.
- **Government Departments or Agencies**: Including the Department for Education (DfE).
- **Our Regulator**: E.g., Ofsted.

- **Suppliers and Service Providers:** This includes specific types of providers such as payroll, HR, IT support, and filtering and monitoring services.
- **Financial Organisations:** Including pension providers.
- **Our Auditors.**
- **Survey and Research Organisations.**
- **Health Authorities.**
- **Security Organisations.**
- **Health and Social Welfare Organisations.**
- **Professional Advisers and Consultants.**
- **Charities and Voluntary Organisations.**
- **Police Forces, Courts, or Tribunals.**

7.1. Transferring Data Internationally

We will not share personal information about you with international third parties where different data protection legislation applies.

8. Your Rights

8.1. How to Access Personal Information That We Hold About You (Subject Access Request)

You have a right to make a 'subject access request' to gain access to personal information that we hold about you. If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- Give you a description of it.
- Tell you why we are holding it, how we are 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.

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances. If you would like to make a request, please contact us (see 'Contact us' below).

8.2. Your Other Rights Regarding Your Data

Under UK data protection law, you have certain other rights regarding how your personal data is used and kept safe:

- **Right to Object:** To object to our use of your personal data where it is likely to cause, or is causing, damage or distress.
- **Right to Prevent Direct Marketing:** To prevent your data being used to send direct marketing.
- **Rights Related to Automated Decision-Making:** To object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person).
- **Right to Rectification:** In certain circumstances, to have inaccurate personal data corrected.
- **Right to Erasure or Restriction:** In certain circumstances, to have the personal data we hold about you deleted or destroyed, or restrict its processing.
- **Right to Withdraw Consent:** Where you previously provided it for the collection, processing, and transfer of your personal data for a specific purpose¹¹⁸.

- **Right to Data Breach Notification:** In certain circumstances, to be notified of a data breach.
- **Right to Complain to ICO:** To make a complaint to the Information Commissioner's Office if you feel we have not used your information in the right way.
- **Right to Compensation:** To claim compensation for damages caused by a breach of the data protection regulations.

Please note that we may refuse your information rights request for legitimate reasons, which depend on why we are processing it. Some rights may not apply in certain circumstances. For example:

- Your right to have all personal data deleted or destroyed does not apply when the lawful basis for processing is legal obligation or public task.
- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task, or legitimate interests.
- Your right to object to the use of your private data does not apply when the lawful basis for processing is contract, legal obligation, or vital interests. If the lawful basis is consent, you do not have the right to object, but you have the right to withdraw consent.

To exercise any of these rights, please contact us (see 'Contact us' below).

9. Complaints

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 have any other concerns about our data processing, please raise this with us in the first instance.

You can make a complaint to us at any time by contacting:

- **Kirsty Osman – CEO 01952 387640 or email**
[Kirsty.osman@fourhillseducationtrust.org.uk](mailto:kirsty.osman@fourhillseducationtrust.org.uk)

Alternatively, you can make a complaint at any time to the Information Commissioner's Office (ICO):

- **Report a concern online:** Visit the [ICO website](https://ico.org.uk)
- **Call:** 0303 123 1113
- **Write to:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

10. Contact Us

- If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer:
- **Rob Montgomery - 01952 383103**
robert.montgomery@telford.gov.uk