

# PRIVACY NOTICE (TIER 4)

## WORKFORCE

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### 1. Scope

This privacy notice covers all data subjects, including applicants for employment and employees whose personal data is collected in their potential/employment at Vision Academy Learning Trust schools, in line with the requirements of the General Data Protection Regulation (GDPR).

### 2. Responsibilities

**2.1** The Data Protection Officer / Trust Compliance Manager is responsible for ensuring that this notice is made available to data subjects prior to Vision Academy Learning Trust collecting/processing their personal data.

**2.2** All Employees/Staff of Vision Academy Learning Trust who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

### 3. Privacy notice

The Vision Academy Learning Trust is a group of secondary and primary schools with a common aim to inspire the imaginations of our students and to support them to develop in ways which stand them in good stead for their future lives and responsibilities as individuals, employees and citizens.

- Vision Academy Learning Trust is a company limited by guarantee registered in England.
- Company Number: 10249712
- Registered Office: Egglecliffe School, Urray Nook Road, Egglecliffe, Stockton-on-Tees, TS16 0LA
- ICO Registration Number ZA194005

Our Data Protection Officer can be contacted directly here:

- [dpo@valt.org.uk](mailto:dpo@valt.org.uk)
- 01642 051020

## PRIVACY NOTICE (TIER 4) WORKFORCE

### The personal data we would like to collect from/process about our Workforce is:

<b>Data Ref</b>	<b>Personal data type:</b>	<b>Source</b> (where Vision Academy Learning Trust obtained the personal data from if it has not been collected directly from you, the data subject.):
1	Personal information – Name, Address, Date of Birth, Home Address.	
2	Personal contact details - Personal email address, Personal telephone numbers	
2a	Social Media Handles & Online searches	To comply with recommended online checks
3	Application form, Teacher Reference Number (TRN) Qualifications, Training, CV	
4	References	References are provided by the Referees identified by data subject
5	Gender, age, ethnicity, nationality, country of birth, marital status, sexuality, trade union membership, disability (equal opportunities monitoring)	
6	Health records – health declaration, occupational health reports and associated documents	Initial health declaration by data subject
7	Work permit	
8	DBS clearance number	Disclosure Barring Service
9	Proof of identity documents (passport, marriage/birth certificate, driving license, utility bills etc.)	
10	Emergency Contact Details/Next of kin names, contact telephone numbers, email addresses, addresses	
11	Bank account details Tax/NI Reference	Vision Payroll provider
12	Photograph (taken by third party or employee, for ID Badge and staff record)	Third party photographer/Vision Employee
13	Payroll information: employment start date, employment term, salary, Payroll Number, Pension number, Trade Union Membership	
14	Attendance information – number of absences, absence reasons, leave requests and associated documents	
15	Timesheets, mileage	
16	Performance Management information – appraisal, disciplinary and associated documents	Line Manager
17	CPD information – in work training	
18	Biometric (fingerprint) data	
19	CCTV video surveillance	
20	Audio – Recordings of telephone calls	

## PRIVACY NOTICE (TIER 4) WORKFORCE

### The personal data we collect will be used for the following purposes:

Data Ref	Personal data type:	Purpose of processing:
1	Personal information – Name, Address, Date of Birth, Home Address.	Recruitment to a post Contract of Employment To maintain school information required by law
2	Personal contact details - Personal email address, Personal telephone numbers	Recruitment to a post Appointment to post
2a	Social Media Handles	Recruitment to a post Appointment to post
3	Application form, Teacher Reference Number (TRN) Qualifications, Training, CV	Recruitment to a post To maintain school information required by law
4	References	Recruitment to a post
5	Gender, age, ethnicity, nationality, country of birth, marital status, sexuality, trade union membership, disability (equal opportunities monitoring)	Recruitment to a post
6	Health records – health declaration, occupational health reports and associated documents	Pre-employment checks To maintain school information required by law
7	Work permit	Pre-employment checks To maintain school information required by law
8	DBS clearance number	Pre-employment checks To maintain school information required by law
9	Proof of identity documents (passport, marriage/birth certificate, driving license, utility bills etc.)	Pre-employment checks To maintain school information required by law
10	Emergency Contact Details/Next of kin names, contact telephone numbers, email addresses, addresses	Appointment to post
11	Bank account details Tax/NI Reference	Appointment to post
12	Photograph (taken by third party or employee, for ID Badge and staff record)	Appointment to post
13	Payroll information: employment start date, employment term, salary, Payroll Number, Pension number, Trade Union Membership	Payment of salary and deductions To maintain school information required by law
14	Attendance information – number of absences, absence reasons, leave requests and associated documents	Payment of salary and deductions Staff management To maintain school information required by law
15	Timesheets, mileage	Payment of salary and deductions
16	Performance Management information – appraisal, disciplinary and associated documents	Staff management
17	CPD information – in work training	Staff management
18	Biometric (fingerprint) data	To provide meal service for staff
19	CCTV video surveillance	To safeguard the individuals on our premises
20	Audio – Recordings of telephone calls	To safeguard the individuals on our premises

# PRIVACY NOTICE (TIER 4)

## WORKFORCE

**Our legal basis for processing for the personal data is as follows:**

Note: “Article” refers to the section of the General Data Protection Regulation under which lawful processing is permitted.

Data Ref	Personal data type:	Legal Basis
1	Personal information – Name, Address, Date of Birth, Home Address	<ul style="list-style-type: none"> <li><b>Article 6(1)(c) - legal obligation</b> Keeping children safe in education. July 2015 (Statutory Guidance from Dept. of Education) Sections 86 – 144)</li> </ul>
2	Personal contact details - Personal email address, Personal telephone numbers	
3	Application form, Teacher Reference Number (TRN) Qualifications, Training, CV	
4	References	
6	Health records – health declaration, occupational health reports and associated documents	
7	Work permit	
8	DBS clearance number	
9	Proof of identity documents (passport, marriage/birth certificate, driving license, utility bills etc)	
12	Photograph (taken by third party or employee, for ID Badge and staff record)	
1	Personal information – Name, Address, Date of Birth, Home Address	<ul style="list-style-type: none"> <li><b>Article 6(1)(b) – contract</b> to fulfil a contract of employment</li> </ul>
13	Payroll information: employment start date, employment term, salary	
11	Bank account details Tax/NI Reference	
14	Attendance information – number of absences, absence reasons, leave requests and associated documents	
15	Timesheets, mileage	
10	Emergency Contact Details/Next of kin names, contact telephone numbers, email addresses, addresses	<ul style="list-style-type: none"> <li><b>Article 6(1)(d) – to protect the vital interests of the data subject</b></li> </ul>
5	Gender, age, ethnicity, nationality, country of birth, marital status, sexuality, trade union membership, disability (equal opportunities monitoring)	<ul style="list-style-type: none"> <li><b>Article 6(1)(c) - legal obligation</b></li> <li>The Equality Act 2010 Part 5</li> </ul>
18	Biometric (fingerprint) data	<ul style="list-style-type: none"> <li><b>Article 6(1)(b) – contract</b> to fulfil a contract between employee and caterer</li> </ul>
19	CCTV video surveillance	<ul style="list-style-type: none"> <li><b>Article 6(1)(e) – official authority</b></li> <li>Section 547 of the Education Act 1996</li> </ul>
20	Telephone call recordings	<ul style="list-style-type: none"> <li><b>Article 6(1)(d) – to protect the vital interests of the data subject</b></li> </ul>

# PRIVACY NOTICE (TIER 4)

## WORKFORCE

**The legitimate interests pursued by us are as follows:**

Note: “Article” refers to the section of the General Data Protection Regulation under which lawful processing is permitted.

Data Ref	Personal data type:	Legitimate interests
16	Performance Management information – appraisal, disciplinary	Article 6(1)(f) – legitimate interest To monitor the progress, develop, evaluate and support employees
17	CPD information – in work training	

**The special categories of personal data concerned are:**

Note: “Article” refers to the section of the General Data Protection Regulation under which lawful processing of special category data is permitted.

Data Ref	Special categories of personal data:	Lawful basis for processing
5	Ethnicity, nationality, country of birth, marital status, sexuality, trade union membership, disability (equal opportunities monitoring)	Article 9(2)(b) – obligation of the controller authorised by law (The Equality Act 2010 Part 5) <b>This information is collected anonymously. The data subject may withhold this information at the time of collection if they choose.</b>
6	Health records – health declaration, occupational health reports and associated documents	Article 9(2)(b) – obligation of the controller authorised by law (The Education (Health Standards) (England) Regulations 2003)
9	Proof of identity documents (passport, marriage/birth certificate)	Article 9(2)(b) – obligation of the controller authorised by law Keeping children safe in education. July 2015 (Statutory Guidance from Dept. of Education) Sections 86 – 144)
14	Attendance information – number of absences, absence reasons, leave requests and associated documents	Article 9(2)(b) – obligation of the controller in the field of employment in calculating occupational pay rights (ie statutory sick pay, maternity pay)
13	Payroll information: Trade Union Membership	Article 9(2)(b) – obligation of the controller field of employment, in the payment of Trade Union fees deducted from salary only. <b>Data subjects may wish to arrange their own Trade Union membership and payment away from Payroll.</b>
18	Biometric (fingerprint) data	Article 9(2)(a) – explicit consent <b>We require your explicit consent for processing this data; see section 3.1</b>

### 3.1 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Vision Academy Learning Trust to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

## PRIVACY NOTICE (TIER 4) WORKFORCE

The personal data that requires your explicit consent for processing is as follows:

Data Ref	Personal data type:	Purpose of processing where Article 6(1)(a) – consent is explicitly required
2a	Social Media Handles	Social media handles provided by short listed candidates will enable reasonable online checks to be carried out prior to interview to enable discussions around any safeguarding or reputational concerns highlighted that are publicly available.
5	Ethnicity, nationality, country of birth, marital status, sexuality, trade union membership, disability (equal opportunities monitoring)	The monitoring of applications for the purpose of equal opportunities is a practice recommended by the Equality and Human Rights Commission. Vision as an employer is obliged by the Public Sector Equalities Duty to uphold the Equalities Act 2010. <b>This information is collected at the point of a job application and is submitted anonymously. An applicant may choose to withhold this information if they wish.</b>
18	Biometric (fingerprint) data	Vision schools use biometric data to operate our cashless catering system. Staff are identified by a biometric system which reads their fingerprint. Our system uses an image of the fingerprint to create a mathematical algorithm and then discards the fingerprint; only the numbers remain and these cannot be re-interpreted back into a fingerprint image

Consent for the above personal data is given at the time of collecting the information on the application for employment form and at the time of setting up cashless catering.

You may withdraw this consent at any time by completing a **Withdrawal of Consent Form GDPR DOC 2.7C**.

# PRIVACY NOTICE (TIER 4)

## WORKFORCE

### 3.2 Disclosure

Vision Academy Learning Trust has a legal obligation to routinely pass on your personal data to the third parties listed below:

Data Ref	Personal Data Type	Name of Third Party and Purpose of processing
1	Personal information – Name, Address, Date of Birth, Home Address	<ul style="list-style-type: none"> <li>Department for Education</li> <li><b>Article 6(1)(c) - legal obligation</b> The Education (Supply of Information about the School Workforce) (No.2) (England) Regulations 2007, made under Sections 113 and 114 of the Education Act 2005</li> </ul> <p>The School Workforce Census collects information about individual teachers, teaching assistants and other school staff and some information about the schools themselves, such as the number of teaching vacancies. The individual information collected includes characteristics of staff, gender and ethnicity etc., types of contract and how they are deployed on full or part time, permanent, roles and responsibilities, salary details, sickness absence details, qualifications held and for a sample of secondary schools the curriculum taught. The School Workforce Census is collected on an annual basis in November.</p>
2	Personal contact details - Personal email address, Personal telephone numbers	
3	Qualifications, Training	
6	Health records – disability	
7	Work permit	
8	DBS clearance number	
9	Proof of identity documents (passport, marriage/birth certificate, driving license, utility bills etc.)	
14	Attendance information – number of absences	
13	Payroll information: employment start date, employment term, salary, Payroll Number	
1	Personal information – Name, Date of Birth	
3	TRN, Qualifications, Training	
11	NI Reference	

## PRIVACY NOTICE (TIER 4) WORKFORCE

**The following third parties will receive your personal data for the following purpose(s) as part of our routine processing activities:**

Data Ref	Personal Data Type	Name of Third Party Purpose of processing
12	Personal Information types 1, 2, 3, 6, 7, 8, 9, 14 and 13 as listed in section 3.2 Disclosure School Workforce Census Photograph (taken by third party or employee, for ID Badge and staff record)	Arbor is replacing Capita SIMS as our electronic management information systems. They contain the staff records that are required by law in the School Workforce Census.  Staff have permissions-controlled access to this.

1	Personal information – Name, Address, Date of Birth, Home Address	Azets Audit Services Ltd Clive Owen – Internal Audit In accordance with company law and the Academies Financial Handbook, our auditors check a sample of employee records during internal and external financial regularity audits. Our auditors also access all teachers' payroll data to undertake a teacher pension audit.
13	Payroll information: employment start date, employment term, salary, Payroll Number	
14	Attendance information – number of absences, absence reasons, leave requests and associated documents	
15	Timesheets, mileage	

1	Personal information – Name, Date of Birth	IMP IMP is the Trusts Budget and Forecasting tool to enable us to plan our finances. Staff have permissions-controlled access to this
13	Payroll information: employment start date, employment term, salary, Payroll Number	

1	Personal information – Name, Address, Date of Birth, Home Address	Heales Medical  We share this information with Heales Medical Ltd as the appointed occupational health providers to the Trust.
2	Personal contact details - Personal email address, Personal telephone numbers	
6	Health records – health declaration, occupational health reports and associated documents	

1	Personal information – Names, Date of Birth	Nationwide Retail Systems Ltd (NRSLtd) Vision schools operate a cashless catering system. We share the data identified with NRSLtd to create numerical IDs from fingerprints to manage our cashless catering system.  <b>We require your explicit consent for processing this data; see section 3.1</b>
18	Biometric (fingerprint) data	



# PRIVACY NOTICE (TIER 4)

## WORKFORCE

1	Personal information – Name, Address, Date of Birth, Home Address	<p>NEREO</p> <p>We share this information with the North East Regional Employers' Organisation (NEREO) who process Disclosure &amp; Barring Service (DBS) checks on our behalf.</p> <p>NEREO is an approved Registered Body with the Disclosure and Barring Service</p>
2	Personal contact details - Personal email address, Personal telephone numbers	
8	DBS clearance number	
9	Proof of identity documents (passport, marriage/birth certificate, driving license, utility bills etc)	
	All personal information within this privacy notice	<p>OneITSS Ltd</p> <p>OneIT are the providers of hardware, software and network administration, installation, maintenance and IT support desk services to Vision schools.</p> <p>One IT Staff have permissions-controlled access to this.</p>
1	Personal information – Names, Date of Birth	<p>ParentMail</p> <p>Vision schools use ParentMail as a platform to communicate with staff, parents and facilitate payment of trips and activities on our behalf. We share the personal information identified to set users up on the system.</p> <p><b>Retrieve a copy of the Privacy Notice in place here</b></p> <p><a href="https://www.parentmail.co.uk/privacy-policy">https://www.parentmail.co.uk/privacy-policy</a></p>
4	Personal Telephone number	
1	Personal information – Name, Address, Date of Birth, Home Address	<p>Xentrall HR (Payroll and Pensions)</p> <p>We share this information with Xentrall as the appointed payroll and pension services providers to the Trust.</p> <p>XPS Administration - Teesside Pension Fund and Teacher Pensions- Teachers Pension Scheme are provided with the information necessary to fulfil their tasks.</p> <p>Sovereign Risk Management – Schools Advisory Service</p>
6	Health records – health declaration, occupational health reports and associated documents	
11	Bank account details Tax/NI Reference	
13	Payroll information: employment start date, employment term, salary, Payroll Number, Pension number, Trade Union Membership	
14	Attendance information – number of absences, absence reasons, leave requests and associated documents	
15	Timesheets, mileage	
16	Performance Management information – associated documents	

# PRIVACY NOTICE (TIER 4)

## WORKFORCE

### 3.3 Retention period

Vision Academy Learning Trust will process personal data for the duration that data subjects apply for employed or are employed by Vision. We hold workforce data in the form of secure paper and electronic records and store the personal data according to the Information and Records Management Society Information Management Toolkit for Schools.

Data Ref	Personal data type:	Retention Period
1	Personal information – Name, Address, Date of Birth, Home Address	Candidates Date of appointment of successful candidate + 6 months
2	Personal contact details - Personal email address, Personal telephone numbers	
2a	Social Media Handles and findings	Employees Termination of Employment + 6 years
3	Application form, Teacher Reference Number (TRN) Qualifications, Training, CV	
4	References	
5	Ethnicity, nationality, country of birth, marital status, sexuality, trade union membership, disability (equal opportunities monitoring)	
6	Health records – health declaration, occupational health reports and associated documents	Employees Termination of Employment + 6 years
7	Work permit	
8	DBS clearance number	
9	Proof of identity documents (passport, marriage/birth certificate, driving license, utility bills etc)	
10	Emergency Contact Details/Next of kin names, contact telephone numbers, email addresses, addresses	Termination of Employment + 6 months
11	Bank account details Tax/NI Reference	Termination of Employment + 6 years
12	Photograph (taken by third party or employee, for ID Badge and staff record)	Termination of Employment + 6 months
13	Payroll information: employment start date, employment term, salary, Payroll Number, Pension number, Trade Union Membership	Termination of Employment + 6 years
14	Attendance information – number of absences, absence reasons, leave requests and associated documents	
15	Timesheets, mileage	
16	Performance Management information – appraisal, disciplinary and associated documents	
17	CPD information – in work training	Not retained
18	Biometric (fingerprint) data	
19	CCTV video surveillance	
20	Audio – Recordings of telephone calls	

### 3.4 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

## **PRIVACY NOTICE (TIER 4)**

### **WORKFORCE**

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- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Vision Academy Learning Trust refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.5 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.2 above) in the processing of your personal data.

To make a subject access request access, use the form **GDPR\_REC\_4.2**.

# PRIVACY NOTICE (TIER 4)

## WORKFORCE

### 3.5 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Vision Academy Learning Trust (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Vision Academy Learning Trust’s Data Protection Officer.

The details for each of these contacts are:

	<b>Supervisory authority contact details</b>	<b>Data Protection Officer (DPO) contact details</b>
Name:	Information Commissioners Office	Mrs A Sotheby
Address line 1:	Information Commissioner's Office Wycliffe House, Water Lane Wilmslow, Cheshire, SK9 5AF	Egglescliffe School, Urlay Nook Road, Egglescliffe, Stockton-on-Tees, TS16 0LA
Email:	<a href="https://ico.org.uk/global/contact-us/email/">https://ico.org.uk/global/contact-us/email/</a>	dpo@valt.org.uk
Telephone:	0303 123 1113	01642 051020

### Document Owner and Approval

The Data Protection Officer / Trust Compliance Manager is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the Vision Staff documents page and is published on [www.valt.org.uk/privacy](http://www.valt.org.uk/privacy).

Signature: A. Sotheby

Date: 01/06/2023

# PRIVACY NOTICE (TIER 4)

## WORKFORCE

### Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Jill Turner	21/5/18
2	Change of DPO to A Sotheby	A. Sotheby	18/11/19
3	Reviewed and revised	A. Sotheby	27/02/2020
4	Review/ Reformat	A. Sotheby	30/04/2020
5	Review – change of internal auditors	A. Sotheby	18.09.2020
6	Change of Budget tool from HCSS to IMP	A. Sotheby	01.03.2021
7	Addition of Social Media handles to enable online checks	A. Sotheby	03/03/2023
8	Addition of Arbor MIS which will replace SIMS.	A. Sotheby	01/06/2023