



# Staff Privacy Notice

*(Including Trustees, Governors and Members)*

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Alliance website		School website	
1	Statutory publication	A	Statutory publication
2	Good practice	B	Good practice
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**Policy level			
1	Trust wide	Single policy relevant to everyone and consistently applied across all schools and departments, with no variation. e.g. Complaints procedure	Statutory policies approved by the Alliance Board of Trustees (or designated Trustee Committee). Non-statutory policies approved by the CEO with exception of Executive Pay.
2	Trust core values	This policy defines the Trust core values in the form of a Trust statement to be incorporated fully into all other policies on this subject, that in addition contain relevant information, procedures and or processes contextualised to that school. e.g. Safeguarding, Behaviour	Statements in statutory policies approved by the Alliance Board of Trustees (or designated Trustee Committee). Statements in non-statutory policies approved by the CEO.  Policy approved by Local School Board.
3	School/department	These policies/procedures are defined independently by schools as appropriate. E.g. Anti-bullying	Approved by Local School Board.

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## **1. Introduction**

**1.1** The Alliance Schools Trust (“the Trust”) is the data controller for the personal information processed by the Trust and its academies.

**1.2** The Trust collects and uses personal information relating to employees, workers, agency staff, contractors, volunteers, trustees, governors and members (“staff” or “you”) in order to carry out its functions as an education provider and employer.

**1.3** The Trust is committed to protecting the privacy and security of your personal information and handling it in accordance with:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- Relevant employment law
- Guidance issued by the Information Commissioner’s Office (ICO)
- Relevant ACAS guidance

**1.4** This privacy notice explains:

- What personal information we collect
- Why we collect and use this information
- The lawful bases we rely on
- How long we keep information
- Who we share information with
- Your rights regarding your personal information

## **2. What Information Do We Collect?**

**2.1** The Trust collects and processes a range of personal information relating to staff, including where appropriate:

- Personal details including name, title, date of birth and National Insurance number
- Contact details including address, telephone numbers and email addresses
- Emergency contact information
- Recruitment and employment records
- Qualifications and professional memberships
- References and employment history
- Identity verification and right to work documentation
- Disclosure and Barring Service (DBS) information where required
- Payroll, banking, pension and taxation information
- Attendance, absence and annual leave records
- Performance management and appraisal records
- Training and professional development records
- Disciplinary, grievance and capability records
- Health and safety records
- Records of work-related incidents or accidents

- Photographs, CCTV images and identification badge information
- Records relating to the use of Trust IT systems, devices and networks
- Communications records including emails and telephone records where applicable
- Information required to support safeguarding obligations
- Information required for equality monitoring

## **2.2 Special Category Data**

The Trust may also process special category personal data where permitted by law, including:

- Information relating to physical or mental health
- Disability and workplace adjustments information
- Ethnic origin and equality monitoring information
- Trade union membership information where applicable
- Biometric data where used and separately consented to

## **3. Why We Collect and Use This Information**

**3.1** The Trust uses staff information to:

- Enable individuals to work for the Trust
- Fulfil contractual and employment obligations
- Safeguard pupils, staff and visitors
- Maintain safe and secure school environments
- Support teaching, learning and operational functions
- Administer payroll, pensions and employee benefits
- Manage recruitment and safer recruitment processes
- Support employee wellbeing and occupational health
- Monitor equality and diversity
- Manage performance, training and professional development
- Investigate complaints, grievances and disciplinary matters
- Maintain security of Trust premises, systems and information
- Comply with legal and regulatory obligations
- Communicate important Trust information
- Support emergency planning and incident management

## **3.2 Safeguarding**

The Trust may process and share information where necessary to safeguard children and vulnerable individuals in accordance with statutory safeguarding duties, including Keeping Children Safe in Education (KCSIE).

## **4. The Legal Basis for Using Personal Information**

**4.1** Under UK GDPR, the lawful bases we rely on for processing personal information include:

### **4.1.1 Contractual Necessity – Article 6(1)(b)**

Processing is necessary for the performance of an employment contract or to take steps before entering into a contract.

Examples include:

- Paying salaries
- Managing annual leave
- Administering pensions and benefits

#### **4.1.2 Legal Obligation – Article 6(1)(c)**

Processing is necessary to comply with legal obligations.

Examples include:

- Providing information to HMRC
- Maintaining safeguarding records
- Carrying out safer recruitment checks
- Health and safety obligations

#### **4.1.3 Public Task – Article 6(1)(e)**

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 Trust as an education provider.

Examples include:

- Maintaining educational and safeguarding records
- Supporting pupil welfare
- Managing school operations

#### **4.1.4 Legitimate Interests – Article 6(1)(f)**

Processing is necessary for the Trust's legitimate interests where these are not overridden by individuals' rights and freedoms.

Examples include:

- Ensuring network and information security
- Investigating misconduct
- Managing internal administration and governance

#### **4.1.5 Vital Interests – Article 6(1)(d)**

Processing is necessary to protect someone's life.

Examples include:

- Sharing emergency medical information where required

#### **4.1.6 Consent – Article 6(1)(a)**

Where consent is relied upon, it will be freely given, specific and capable of being withdrawn.

Examples may include:

- Optional use of photographs in marketing materials
- Biometric systems where applicable

### **5. Special Category Data**

**5.1** Where the Trust processes special category personal data, it does so under one or more of the following conditions under Article 9 UK GDPR:

- Employment, social security and social protection law obligations – Article 9(2)(b)
- Vital interests – Article 9(2)(c)
- Substantial public interest – Article 9(2)(g)
- Explicit consent – Article 9(2)(a)
- Occupational health purposes – Article 9(2)(h)

### **6. Monitoring, CCTV and Telephone Recording**

#### **6.1 CCTV**

The Trust uses CCTV systems on school sites for safeguarding, security, crime prevention, health and safety, investigation of incidents and protection of Trust property.

Access to CCTV footage is restricted to authorised personnel and recordings are retained only for as long as necessary in accordance with the Trust's retention schedule.

#### **6.2 IT Monitoring**

The Trust may monitor the use of its IT systems, devices, email, internet access and networks where necessary to:

- Maintain system security
- Prevent unauthorised access or misuse
- Support safeguarding obligations
- Investigate suspected misconduct
- Ensure compliance with Trust policies

Any monitoring will be proportionate, lawful and carried out in accordance with UK data protection law and relevant employment guidance.

### **6.3 Telephone Recording**

Where telephone calls are recorded, this will be for legitimate business purposes such as safeguarding, training, quality assurance, complaint investigation and health and safety. Individuals will be informed where calls are recorded.

### **7. Biometric Systems**

**7.1** Where the Trust uses biometric systems for staff identification, explicit written consent will be obtained before any biometric data is processed.

**7.2** Alternative arrangements will always be available for individuals who choose not to provide biometric data or who later withdraw consent.

### **8. Sharing Personal Information**

**8.1** The Trust may share personal information where necessary, lawful and proportionate.

**8.2** This may include sharing information with:

- The Department for Education (DfE)
- Local authorities
- HMRC
- Pension providers
- Occupational health providers
- Payroll providers
- Regulatory bodies including Ofsted
- Police, courts and law enforcement agencies
- Social care and safeguarding agencies
- Professional advisers and insurers
- Trust service providers and contractors

**8.3** Where personal information is shared with suppliers or service providers, the Trust ensures appropriate contractual and security measures are in place.

### **9. International Transfers**

**9.1** Where personal information is transferred outside the United Kingdom, the Trust will ensure appropriate safeguards are in place in accordance with UK data protection law.

### **10. How Long We Keep Personal Information**

**10.1** The Trust retains personal information only for as long as necessary for legal, operational and regulatory purposes.

**10.2** Retention periods are determined in accordance with:

- Statutory requirements
- ICO guidance
- The Information and Records Management Society (IRMS) Schools Toolkit
- The Trust's Data Retention Schedule

**10.3** Examples of retention periods include:

- Personnel files: generally, 6 years after employment ends
- Payroll records: generally, 6 years
- Accident records: retained in accordance with health and safety requirements

**10.4** Further information is available in the Trust's Data Retention Policy.

## **11. Automated Decision-Making**

**11.1** The Trust does not routinely make decisions about staff based solely on automated processing.

## **12. Your Rights**

**12.1** Under UK GDPR, individuals have rights including:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure in certain circumstances
- The right to restrict processing
- The right to object
- The right to data portability where applicable
- Rights relating to automated decision-making

**12.2** Where processing is based on consent, consent may be withdrawn at any time.

**12.3** Requests relating to personal information should be made to the Data Protection Officer.

## **13. Complaints**

**13.1** If you have concerns about how the Trust handles personal information, please contact the Trust in the first instance.

**13.2** You also have the right to complain to the Information Commissioner's Office (ICO):

[Information Commissioner's Office](#)

Telephone: 0303 123 1113

## **14. Contact Details**

#### **14.1 Data Controller**

The Alliance Schools Trust  
Beaufort Drive  
Willen  
Milton Keynes  
MK15 9HN

#### **14.2 Data Protection Officer**

Name: Sarah Horrigan  
Email: [horrigans@tastrust.org.uk](mailto:horrigans@tastrust.org.uk)

## **Appendix 1 – Trustees, Governors and Members Privacy Information**

### **A1. Introduction**

This appendix applies to trustees, governors, academy committee members and Trust members acting in governance or voluntary office-holder roles within the Trust.

### **A2. Information We Collect**

The Trust may collect and process:

- Names, titles and contact details
- Governance appointment information
- Terms of office and attendance records
- Committee memberships and governance responsibilities
- Training and development records
- Disclosure and Barring Service (DBS) status and checks where required
- Declarations of interests and eligibility forms
- Signed governance documentation including Codes of Conduct
- Recruitment and appointment records
- CCTV images captured whilst on Trust premises
- Accessibility or disability information where relevant

### **A3. Why We Use This Information**

The Trust uses governance information to:

- Establish and maintain effective governance arrangements
- Comply with legal and regulatory obligations
- Maintain statutory governance records
- Publish governance information where legally required
- Support governance training and development
- Respond to regulatory investigations, complaints or audits
- Meet requirements of the Department for Education, Companies House and the Academy Trust Handbook

Certain governance information may be published on the Trust website or shared with the Department for Education where required by law.

### **A4. Legal Basis**

The Trust processes governance information primarily under:

- Article 6(1)(c) – Legal obligation
- Article 6(1)(e) – Public task
- Article 6(1)(f) – Legitimate interests

Where special category data is processed, the Trust relies on relevant Article 9 conditions under UK GDPR.

#### **A5. Sharing Information**

The Trust may share governance information where lawful and necessary with:

- The Department for Education
- Local authorities
- Ofsted
- Auditors and regulators
- Governance support providers
- Professional advisers
- Other academies within the Trust where appropriate

#### **A6. Retention**

Governance records are retained in accordance with the Trust's Data Retention Schedule and relevant statutory requirements.