Five Rivers Multi Academy Trust

# Privacy notice for the trust workforce

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# 1. Introduction

Under UK data protection law, individuals have a right to be informed about how our trust uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **individuals we employ, or otherwise engage to work in our trust** in roles such as volunteers, governors/trustees. 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.

Five Rivers Multi Academy Trust is the 'data controller' for the purposes of UK data protection law. This means that we are responsible for deciding how we hold and use personal information about you.

We will comply with the data protection law and principles, which means that 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

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Your name
- Contact details
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information [paid roles only]
- 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
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence or other evidence of identity
- Photographs and CCTV images captured in school/on site
- Information about your use of our information and communication systems, equipment and facilities (e.g. school computers)

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

- Information about any health conditions you have that we need to be aware of including information about disability and access requirements
- Absence & Sickness records, occupational health referrals and reports or statements of fitness for work from your GP or hospital
- Ethnicity
- Information about trade union membership
- We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and local authorities, and the Disclosure and Barring Service in respect of criminal offence data.

## 3. Why we use this data

We collect and use the data listed above to:

a) Enable you to be paid [where applicable]

b) Check you are legally entitled to work in the UK

c) Determine the terms on which you work for us

d) Facilitate safe recruitment, as part of our safeguarding obligations towards pupils

e) Support effective performance management

f) Inform our recruitment and retention policies

g) Allow better financial modelling and planning

h) Enable equalities monitoring

i) Improve the management of workforce data across the sector

j) Ensure that appropriate access arrangements can be provided for people that require them

k) Establish and maintain effective governance

l) Meet statutory obligations for publishing and sharing details about employees, trustees and governors

m) Support the work of the School Teachers' Review Body

n) Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely

o) To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.

p) Ascertaining your fitness to work

q) Managing 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, in compliance with the above rules, 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 emails and/or texts 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. If this changes in the future, we will amend any relevant privacy notices in order 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're in any of our trust's schools, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- 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

Our lawful bases for processing your personal data for the purposes listed in section 3 above are as follows:

- **Contract**: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
  For example: Employed staff have a contract with the school/trust
- **Legal obligation**: the processing is necessary for you to comply with the law (not including contractual obligations). We need to process data to meet our responsibilities under law as set out here: https://www.gov.uk/government/collections/statutory-guidance-schools
  An example of this is 'safeguarding children and young people'
- **Public task**: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law. Managing a school is considered a '**task in the public interest**' and public task is the lawful basis for most education-related processing. Further details are available here: https://www.gov.uk/government/collections/statutory-guidance-schools
- Ask for your **Consent**: the individual has given clear consent for you to process their personal data for a specific purpose. An example of this may be certain uses of photos of you.
- The data needs to be shared with another data controller under a '**recognised legitimate interest**' either to allow them to fulfil their '**public task**' obligations or using a 'condition' such as '**safeguarding a vulnerable individual**', '**crime**', '**emergency**', or '**national security**'.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

### 4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 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 an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're 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 law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're 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 (as detailed above in section 4 of this notice).

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 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 from you, but we may also hold data about you from:

- Local authorities
- Health Authorities, GPs or Occupational Health
- The Department for Education
- Police forces, courts or tribunals
- Previous employer or Personal Referee
- Your use of the school network and equipment via our appropriate filtering and monitoring systems in line with DfE guidance
- Online searches carried out by the trust or on behalf of the trust in-line with the DfE KCSIE 2025 guidance Section 225 (Section 292 in the 2026 version). "...as part of the shortlisting process schools and colleges should consider carrying out an online search as part of their due diligence on the shortlisted candidates."

## 6. How we store this data

We keep personal information about you and your child while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary to comply with our legal obligations or to meet our regulatory requirements. Our record retention policy sets out how long we keep information about pupils.

We will dispose of you and your child's personal data securely when we no longer have a legal requirement to retain it. If you wish to see a copy of the school's retention policy please contact the school office.

We have put in place appropriate security measures to keep you and your child's personal information secure, as required by Article 32 of UK GDPR and relevant ICO guidance.

## 7. Who we share data with

We routinely share information with:

- Our local authority, Sheffield City Council – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Learn Sheffield Governance Service
- The Department of Education - e.g. workforce census

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 with:

- Your family and representatives - next of kin in an emergency
- Ofsted, our regulator
- Suppliers and service providers:
    - List the specific types of providers (e.g. catering, HR)
    - Employment checking services e.g. DBS
- Financial organisations such as South Yorkshire Pension Authority – LGPS
- Future employers for references
- Our auditors
- Survey and research organisations  e.g. School Teachers' Review Body
- NHS teams and professionals
- Health and social welfare organisations
- Police forces, courts or tribunals - only when required by law
- Professional advisers and consultants
- Charities and voluntary organisations
- Employment and recruitment agencies - e.g. references

### 7.1 Transferring data internationally

We may share personal information about you with the following international third parties, where different data protection legislation applies:

- Microsoft, (including Microsoft 365)
- Smoothwall

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

# 8. Your rights

## 8.1 How to access personal information that we hold about you

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 data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data where it is likely to cause, or is causing damage or distress
- Prevent your data being used to send direct marketing
- 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)
- In certain circumstances, have inaccurate personal data corrected or blocked
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office if you feel we have not used your information in the right way
- Claim compensation for damages caused by a breach of the data protection regulations

We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

- Your right to have all personal data deleted or destroyed doesn't 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
- Right to object to use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent

See information on types of lawful basis in section 4 of this privacy notice.

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 data protection complaint to us at any time by contacting Emma Farmer, FRMAT data protection lead.

From June 2026, when a data protection complaint is lodged with us we will:

- Acknowledge the complaint within 30 days
- Take appropriate steps to investigate the complaint
- Inform the complainant of the outcome of the complaint without undue delay

If you have complaints about the way that your personal data is processed, you must complain to the trust in the first instance. If you are not satisfied with the school's response, you can complain to the Information Commissioner;

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

## 10. Contact us

Our data protection officer is:

- **Andy Wynne, of Learn Sheffield –** email andy.wynne@learnsheffield.co.uk, Tel 0114 250 7417

However, each school has a **data protection lead** who has day-to-day responsibility for data protection issues in their school.

If you're based primarily in one school and have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact them:

- Emma Farmer, FRMAT data protection lead enquiries@fiveriversmat.uk
- Tinsley Meadows: Tania Macpherson (Principal) tmacpherson@tinsleymeadows.sheffield.sch.uk
- Abbeyfield: Kate Abell (Principal) kabell@abbeyfield.sheffield.sch.uk