

Employee Privacy Notice / Fair Processing Notice (compliant with the UK GDPR)

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy 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 at our school.

We, Venn Academy Trust, are the 'data controller' for the purposes of data protection law. Our data protection officer is **Amraz Ali, Deputy CEO** – dpo@vennacademy.org

Venn collects and processes personal data relating to its employees to manage the employment relationship. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

What information does Venn Academy Trust collect?

Venn Academy Trust collects and processes a range of information about you. This includes:

- Your name, address and contact details, including email address and telephone number, date of birth and gender;
- The terms and conditions of your employment;
- Details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with Venn Academy Trust;
- Information about your remuneration, including entitlement to benefits such as pensions;
- Details of your bank account and national insurance number;
- Tax and pension details;
- Information for staff expenses forms;
- Information about your title, next of kin, dependants and emergency contacts;
- Information about your nationality and entitlement to work in the UK;
- Information about your criminal record;
- Details of your schedule (days of work and working hours) and attendance at work;
- Details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave;
- Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- Details of any low-level concerns reported that involve you.
- Information related to Childcare Disqualification Requirements (where applicable);
- Detail related to Section 128 check (where applicable);
- Assessments of your performance, including appraisals, performance reviews and ratings, performance improvement plans and related correspondence;
- For teachers: registration related information;
- Information about medical or health conditions, including whether or not you have a disability for which Venn Academy Trust needs to make reasonable adjustments; and
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

Venn Academy Trust will collect this information in a variety of ways. For example, data might be collected through application forms and references; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment (such as benefit nomination forms); from correspondence with you; or through interviews, meetings or other assessments.

Venn Academy Trust will collect personal data about you from third parties, such as references supplied by former employers and information from criminal records checks permitted by law.

Data will be stored in a range of different places, including in your personnel file, in Venn Academy Trust's HR management systems and in other IT systems (including Venn Academy Trust's email system).

Why does Venn Academy Trust process personal data?

Venn Academy Trust needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract. For example, it needs to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer pensions.

In some cases, Venn Academy Trust needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled.

In other cases, Venn Academy Trust has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows Venn Academy Trust to:

- Run recruitment and promotion processes;
- Maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- Operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- Operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- Operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- Obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- Operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that Venn Academy Trust complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- Ensure effective general HR and business administration;
- Provide references on request for current or former employees;
- Respond to and defend against legal claims; and
- Maintain and promote equality in the workplace.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities).

Where Venn Academy Trust processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring and Workforce Census.

Who has access to data?

Your information may be shared internally, including with members of the HR team, your line manager, Senior Leaders within Venn and IT staff if access to the data is necessary for performance of their roles.

Venn Academy Trust shares your data with third parties in order to obtain pre-employment references from other employers, obtain employment background checks from third-party providers and obtain necessary criminal records checks from the Disclosure and Barring Service. Venn Academy Trust may also share your data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements.

Venn Academy Trust also shares your data with third parties that process data on its behalf, in connection with pensions, payroll, the provision of benefits and the provision of occupational health services. Further information and a list of these can be obtained from your school office.

How does Venn Academy Trust protect data?

Venn Academy Trust takes the security of your data seriously. Venn Academy Trust has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where Venn Academy Trust engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For how long does Venn Academy Trust keep data?

Venn Academy Trust retains your personal file from termination of employment plus six years. There are separate retention periods around retaining the detail of child protection allegations and Health and Safety, for example. A full list of retention periods can be found within our Data Retention Schedule – a copy of which can be obtained from your School Business Manager or on the website.

Your rights

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request;
- Require Venn Academy Trust to change incorrect or incomplete data;
- Require Venn Academy Trust to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- Object to the processing of your data where Venn Academy Trust is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact our DPO.

If you believe that Venn Academy Trust has not complied with your data protection rights, you can complain to the Information Commissioner, but we would ask you to raise it with us in the first instance.

What if you do not provide personal data?

You have some obligations under your employment contract to provide Venn Academy Trust with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide Venn Academy Trust with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable Venn Academy Trust to enter a contract of employment with you. If you do not provide other information, this will hinder Venn Academy Trust's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

Further queries?

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact your School Business Manager in the first instance, or the Data Protection Officer.

Data Protection Officer – Amraz Ali, 01482 505030, dpo@vennacademy.org