



GDPR Data Protection Privacy Notice for Staff

This data protection compliance statement (privacy notice) applies to current and former employees, workers and contractors.

Introduction

This privacy notice applies to current and former employees, workers, contractors, agency staff, placements and volunteers (referred to in this notice as “staff”).

It explains how Isle Education Trust (“IET”, “we”, “us”) collects, uses, stores and protects your personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Scope

For the purposes of this notice, “staff” includes all paid and unpaid workers, including employees, secondees, agency staff, contractors, volunteers and individuals on placements.

Controller’s contact details

Isle Education Trust (IET) is the data controller, and they are responsible for any personal data that is provided. This means that they determine the purposes for, and the manner in which, any personal data relating to you is to be processed.

There are many ways you can contact us, including by phone, email and post. Our websites provide further details.

Data Protection Officer

The Data Protection Officer (DPO) for the Trust is the Chief Finance & Operating Officer and can be contacted at GDPR@isleeducationtrust-iet.co.uk

Details of Information we hold about you

Personal data” means any information relating to an identified or identifiable individual, as defined by UK GDPR.

“Special category data” is personal data that requires additional protection, such as data relating to health, ethnicity or trade union membership.

Categories of personal data

We may collect, store and use the following categories of personal data:

Identity and contact data

- Name, title, previous names
- Date of birth

- Gender
- Addresses, telephone numbers and personal email addresses
- Employee number / teacher reference number

Employment and contractual data

- Job title, role, start date, work location
- Contract details, hours, work patterns
- Pay, pension and benefits information
- Bank account details, tax codes and National Insurance number
- Leave and absence records

Recruitment data

- Application forms, CVs and references
- Right to work documentation
- Qualifications, training and employment history

Performance and conduct data

- Appraisals, capability and performance information
- Disciplinary and grievance records
- Training records and professional memberships

Monitoring and security

- CCTV footage
- IT usage logs and access controls
- Building entry records

Special category data

We may process the following special category data where lawful and necessary:

- Health and medical information (including disabilities)
- Equality and diversity information
- Trade union membership
- Biometric data (where applicable)

Criminal convictions data may be processed where required by law, including DBS checks.

Why we collect and use staff information

We process staff personal data to:

- Recruit and appoint staff
- Manage employment relationships
- Pay staff and provide benefits
- Comply with employment, safeguarding and education law
- Manage performance, conduct and capability
- Ensure health, safety and wellbeing

- Provide training and professional development
- Maintain the security of Trust systems and premises

Lawful bases for processing

General personal data (UK GDPR Article 6)

We process personal data under one or more of the following lawful bases:

- **6(1)(b)** – performance of a contract (employment)
- **6(1)(c)** – legal obligation (e.g. HMRC, safeguarding)
- **6(1)(e)** – public task (education and safeguarding functions)

We do not routinely rely on legitimate interests for core employment processing.

Special category data (UK GDPR Article 9)

We process special category data where one or more of the following applies:

- **9(2)(b)** – employment and social security law
- **9(2)(g)** – substantial public interest (e.g. safeguarding, equality duties)
- **9(2)(h)** – health or occupational health purposes
- **9(2)(a)** – explicit consent (used only where genuinely optional)

Sharing your data

We may share your data where necessary with:

- Payroll and pension providers
- HMRC
- Department for Education (DfE)
- Teaching Regulation Agency (TRA)
- Occupational health providers
- IT and cloud service providers (e.g. Arbor, CPOMS, Invenry)
- Legal advisers, insurers and auditors
- Police, courts and regulators
- Prospective employers (references)

All data processors act under contract and must keep your data secure.

Department for Education (DfE)

We are required to share workforce information with the Department for Education under **The Education (Supply of Information about the School Workforce) (England) Regulations 2007**. Data is transferred securely and held in accordance with the Government Security Framework. Privacy information is available at:

<https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers>

International transfers

Some IT systems may involve processing or storage of data outside the UK. Where this occurs, appropriate safeguards under UK GDPR are in place, such as adequacy decisions or approved contractual clauses.

Your data protection rights

You have the right to:

- Be informed about how your data is used
- Access your personal data
- Request correction of inaccurate data
- Request erasure (where applicable)
- Restrict processing
- Object to processing based on public task (where applicable)
- Data portability (limited circumstances)
- Withdraw consent at any time (where consent applies)

We will respond to requests within **one month**.

Requests should be sent to **GDPR@isleeducationtrust-iet.co.uk**

Automated decision-making

We may use limited automated tools (e.g. triggers in absence procedures), but **no decisions are made solely by automated means without human involvement**.

We will inform staff if this changes.

Data security

We have appropriate organisational and technical security measures in place, including:

- IET Data Protection Policy
- Data Retention Policy
- Access controls and monitoring

- Regular compliance reviews
- Any data breaches will be managed and reported in line with legal requirements.

Data retention

Staff data is retained in accordance with the Information and Records Management Society (IRMS) Toolkit (2023).

When data is no longer required, it is securely destroyed or anonymised.

Consequences of not providing data

Failure to provide required information may:

- Prevent employment from commencing or continuing
- Delay salary or benefits payments
- Prevent us from meeting legal obligations

Queries and complaints

For questions or concerns, contact the Data Protection Officer at:

GDPR@isleeducationtrust-iet.co.uk

You also have the right to complain to:

Information Commissioner's Office (ICO)

Wycliffe House, Water Lane
Wilmslow, Cheshire, SK9 5AF
www.ico.org.uk
Telephone: 0303 123 1113