Privacy Notice - Employees

Approved / Reviewed By:	**CEO**
Originally Ratified On:	**N/A**
Last Reviewed On:	**9 December 2025**
Review Expectations:	**Under regular review subject to changes in legislation.** **Formal review will be undertaken annually.**

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The Trust collects and processes personal data relating to its employees to manage the employment relationship. The Trust is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

Data controller: East Anglian Schools' Trust (EAST): mail@eastmat.org

Data protection officer: Nicki Legh-Smith email: dpo@eastmat.org

1. What information does the Trust collect?

The Trust collects and processes a range of information about you.

- 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 the Trust
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover
- details of your bank account and national insurance number
- information about your marital status, 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.
- assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence.
- information about medical or health conditions, including whether or not you have a disability for which the Trust needs to make reasonable adjustments
- details of trade union membership; and where you give us consent to give information for the payment of trade union subscriptions via payroll
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.
- We use traffic log cookies to identify which pages are being used on our websites. This helps the analysis of data about web page traffic and to improve websites in order to tailor them to customer needs. This information is only used for statistical analysis purposes and then the data is removed from the system.

The Trust collects this information in a variety of ways. For example, data is collected through application forms or CVs; and 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.

In some cases, the Trust collects information from employment background check providers, such as references supplied by former employers, information obtained from social media monitoring and information from criminal records checks permitted by law. The Trust collects this information in a variety of ways. For example, data is collected when applying for a role as a job applicant through application forms or CVs. And 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.

Data is stored in a range of different places, including in your personnel file, in the Trust's HR management systems and in other IT systems (including the Trusts' email system and websites). Our websites may contain links to other websites of interest. However, once these links have been used to leave the website, you should note that we do not have any control over that other website. Therefore,

the Trust cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

2. Why does the Trust process personal data?

The 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 benefits, pension, and insurance entitlements.

In some cases, the 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, to enable employees to take periods of leave to which they are entitled, and to consult with employee representatives if redundancies are proposed or a business transfer is to take place. For certain positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question.

In other cases, the Trust has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows the 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
- ensure employees are complying with relevant policies and procedures
- 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 leave, shared parental leave, and parental bereavement leave), to allow effective workforce management, to ensure that the 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
- undertake organisational change and transfer of undertakings (TUPE)
- maintain training and apprentice records
- maintain records of employment
- conduct employee engagement surveys
- provide references on request for current or former employees
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

Where the Trust relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

Some special categories of personal data, such as information about health or medical conditions, or racial or ethnic origin, is processed to carry out employment law obligations (such as those in relation to employees with disabilities, for health and safety purposes and to ensure that employees have the right

to work in the UK). Information about trade union membership is processed to allow the Trust to operate check-off for union subscriptions.

Where the 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 as permitted by the Data Protection Act 2018 and workforce data for the reasons of substantial public interest. You can ask us to stop processing this data at any time.

3. Who has access to data?

Your information will be shared internally, including with members of the HR, business support and recruitment, payroll, your line manager, managers in the business area in which you work and IT/Governance staff, if access to the data is necessary for performance of their roles.
Your data may also be shared with employee representatives in the context of collective consultation on a redundancy or business sale. This would be limited to the information needed for the purposes of consultation, such as your name, contact details, role, and length of service.

The Trust shares your data with third parties to obtain pre-employment references from other employers, obtain employment background checks from third-party providers, obtain necessary criminal records checks from the Disclosure and Barring Service, or report suspected offences to the appropriate authorities. The Trust may also share your data with third parties in the context of a transfer of some or all of its services. In those circumstances the data will be subject to confidentiality arrangements.
The Trust also shares your data with third parties that process data on its behalf, in connection with payroll, the provision of pension, benefits, training providers and the provision of occupational health services.

The Trust will not transfer your data to countries outside of the UK, however your data may be transferred to countries outside of the UK for pre-employment checks where there is relevant relevance in processing an application or offer of employment.

4. How does the Trust protect data?

The Trust takes the security of your data seriously. The 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 the 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.

5. For how long does the Trust keep data?

The Trust will hold your personal data for the duration of your employment. The periods for which your data is held after the end of employment are set out relevant retention periods.

6. 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 the Trust to change incorrect or incomplete data.
- require the Trust to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing.
- object to the processing of your data where the Trust is relying on its legitimate interests as the legal ground for processing; and
- ask the Trust to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Trusts' legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact name, contact the Trusts' central HR team.

You can make a subject access request by writing to the data protection officer.

If you believe that the Trust has not complied with your data protection rights, you can complain to the Trusts' data protection officer of the Information Commissioner.

7. What if you do not provide personal data?

You have some obligations under your employment contract to provide the 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 the Trust with data 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 the Trust to enter a contract of employment with you. If you do not provide other information, this will hinder the Trusts' ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

8. Automated decision-making

Employment decisions are not based solely on automated decision-making.

9. Updating this Privacy Notice

We may need to update this privacy notice periodically if we change how we collect and process data. The school will inform you when this privacy notice has changed; however, we also recommend that you revisit this privacy notice periodically.

10. Summary of Changes

Document control		
Date	**Section(s)**	**Update(s)**
27/11/23	Introduction	Primary School DPO details added.
16/9/24	Introduction	Email addresses and DPO details updated++
9/12/25	Section 9 added	Updating information