



Education Trust

Inspiring the individuals of today, for a better society tomorrow

“Aspire, Belong, Collaborate”

RET WORKFORCE PRIVACY NOTICE

Review Frequency	Annually
Reviewed	August 2026
Next Review	August 2027
Agreed by Trustees	8th September 2026



Contents

About this Privacy Notice	3
The personal data we hold (categories of personal data)	3
Special category (sensitive) personal information	4
Criminal convictions	5
Automated decision making	6
Collecting workforce information: Why do we collect and use your information?	6
Whom we share workforce information with	6
Pensions	7
Storing our workforce data	7
Transferring data internationally	7
Data Protection Principles	7
Requesting access to your personal data	8
Other rights	7
Contact and Complaints	9
Appendix 1 - List of examples of the types of personal data which we collect about staff	10
Appendix 2 – Examples of the purposes for which we process your data	11
Appendix 3 – Ways in which we collect workforce information	12
Appendix 4 - Examples of whom we may share your data with where the law permits	12
Updates to our Privacy Notice	13



About this Privacy Notice

Oldway Primary School, Roselands Primary School and Shiphay Learning Academy are part of Riviera Education Trust and are covered by RET Data Protection Policy.

Individuals have a legal right to be informed about how we use their personal information, which can identify them either directly or indirectly. This Privacy Notice explains how we collect, store and use personal information about the people we employ, or otherwise engage, to work with our Trust.

Our aim is to always provide clear information about the personal information we are using and why we are using it. If anything is unclear, or if you have any concerns then please contact HR.

This is an 'overarching' Privacy Notice and it applies generally to most of the personal information that we collect and use about our workforce. It is based on the model Privacy Notice for the school workforce produced by the Department for Education (DfE). Unless there is a lawful reason not to do so, for example a criminal investigation, we will also provide more specific privacy information at the point at which we collect or use personal information that is not captured by this notice. This Privacy Notice is intended for all of the school workforce (including employees, school governors, volunteers and contract staff) and we encourage all to read it. We have produced separate privacy notices for pupils and parents, job applicants and as appropriate in other areas. While much of the personal information that we collect is mandatory (i.e. it must be provided so that we can manage the employment relationship with you and the school), some of it may be requested on a voluntary basis. Where this is the case, we will request your consent at the point we collect the information. We will explain to you whether there is a requirement to provide certain information to us, or whether you have a choice in doing so.

For the purposes of data protection law, Riviera Education Trust is the 'data controller'.

The Trust's Data Protection Officer (DPO) service is provided by Data Protection Education Ltd. The DPO supports the Trust in meeting its data protection obligations and in ensuring that the rights of individuals are supported. Contact details are provided in the Contact and Complaints section of this notice.

The personal data we hold (Categories of Personal Data)

We process personal data (which may identify you as an individual) relating to those we employ, or otherwise engage to work at our school in order to comply with the law, manage the working relationship and to run the school for example, contact details, date of birth etc.

Examples of the types of personal data that we may collect, use, store and share (when appropriate) are listed at **Appendix 1**.



Data Protection law requires us to have a **lawful reason ('lawful basis')** for processing the personal data we use. These reasons are listed under Article 6 of the 'General Data Protection Regulation' (GDPR). Our lawful basis for processing will be explained at the point at which we collect personal information unless there is a lawful reason not to do so (for example where it is for the prevention or detection of crime).

Riviera Education Trust processes a wide range of personal data for a variety of purposes, as described above. The lawful bases we rely on will therefore vary. However, generally, the lawful bases we mainly use in relation to our workforce are:

- To fulfil a contract, we have entered into with you: For example, we need to collect and use your personal information to fulfil the terms of the employment contract we have with you including to be able to pay you and to administer benefits and pensions.
- We need to comply with the law (we have a legal obligation): For example, we collect and use workforce information under legal and statutory obligations within the latest version of Keeping Children Safe in Education (KCSIE) statutory guidelines. We are required to check employees' suitability to work with children, their entitlement to work in the UK and to comply with health and safety laws.
- We need to carry out a task in the public interest: For example, where the collection and use of workforce information is necessary for us to perform our role as a school and to deliver our public task of providing education to our pupils.
- You have given us consent to use it in a certain way (for example a photo of you for promotional purposes or on our website).
- We need to protect your vital interests (or someone else's interests). This relates to life and death situations.
- It is in ours, a third party's, legitimate business interests to process the data. Where this is the case, we will ensure that we have considered whether our legitimate interests are overridden by your rights and freedoms as the worker or employee.

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 go about withdrawing consent if you wish to do so. We will then cease this aspect of processing.

Special category (sensitive) personal information

We may also collect, store, and use information about you that falls into "special categories" of more sensitive personal data which has extra protection in law and requires us to identify a condition for processing under Article 9 of the GDPR.

Special category data may include personal data revealing or concerning:



- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data for the purpose of uniquely identifying a natural person (for example fingerprints or voice recognition software)
- data concerning health; or
- data concerning a natural person's sex life or sexual orientation

Where we process special category personal data, we will identify both an appropriate lawful basis under Article 6 UK GDPR and an additional condition for processing under Article 9 UK GDPR and, where required, the Data Protection Act 2018. The conditions we most commonly rely upon include:

- Substantial public interest including
 - Statutory and government purposes
 - Equality of opportunity or treatment
 - Preventing and detecting unlawful acts
 - Preventing fraud
 - Public Health
 - Support for individuals with a particular disability or medical condition
 - Safeguarding of children and of individuals at risk
 - Employment, social security and social protection
 - Occupational pensions
- Explicit consent
- Vital interests, where the individual is physically or legally incapable of giving consent (for example, in a medical emergency).
- Health-related processing where necessary for occupational health, assessment of an employee's working capacity or other purposes permitted by data protection law.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. In such cases, we will cease to process the data. We will make this clear requesting your consent and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data. There are also other lawful bases that may apply, and this will be made clear wherever possible.

Our lawful basis for processing will be explained at the point at which we collect personal information unless there is a lawful reason not to do so (for example where it is for the prevention or detection of crime).



Please refer to our Special Categories of Personal Data Policy contained within our Data Protection Policy for further information as to how we process special category data.

Criminal convictions

We may process data about criminal convictions or offences.

We will only process information about criminal convictions or offences where permitted by law. This will usually be where processing is necessary to meet our legal obligations, including those relating to safeguarding, preventing fraud, supporting law enforcement agencies and health and safety. Where required, we will also identify an appropriate condition for processing under data protection law.

We do not retain DBS certificates themselves.

Automated decision making and AI systems

We may use digital systems, including systems supported by artificial intelligence (AI), where appropriate to support the Trust's administrative, educational and operational activities.

Where AI-assisted systems process workforce personal data, their use will be subject to appropriate governance and human oversight. We will ensure that personal data is processed lawfully, fairly and transparently, that only the personal data necessary for the relevant purpose is used, and that appropriate security and confidentiality measures are in place.

We do not make decisions about workforce members based solely on automated processing where those decisions would have a legal or similarly significant effect, unless this is permitted by law and appropriate safeguards are in place.

Where the Trust introduces an AI system that involves a new or significantly different use of workforce personal data, we will assess the data protection implications and provide additional privacy information where appropriate.

Collecting workforce information: Why do we collect and use your information?

The reasons that we collect and use personal information enable us to manage our workforce and help us to run the Trust, please refer to **Appendix 2** for examples.

We collect and use information about you in a variety of ways including through the recruitment process, information obtained through identity documents, from correspondence with you or through interviews, meetings or other assessments while you are working with us. The ways in which we collect workforce information may also include methods as outlined at **Appendix 3**.



In many cases we will collect information about you from third parties, such as references provided by former employers, and information from employment checks or criminal records checks permitted by law.

Whilst you will be required to provide us with some information, there is some information that you can choose to provide to us. 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.

Whom we share workforce information with

We only share workforce information where we have a lawful basis to do so and where the sharing is necessary and proportionate. Where it is legally required or is otherwise necessary (and it complies with data protection law) personal information may be shared with the relevant local authority – to meet our legal obligations to share certain information such as safeguarding concerns or with the Department for Education (DfE). The DfE processes personal data relating to those employed by schools (including all academies and free schools and all special schools including pupil referral units). To find out more about the data collection requirements that are placed upon us by the DfE including the data that we share with them go to:

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>

Further examples of with whom we share data are listed at **Appendix 4**.

Pensions

Our pension providers are the data controller for the information they process for the management and administration of the pension service. As such, they will have their own privacy notice for how they process your personal data, and they should be contacted directly if you have any queries or concerns over the handling of your data.

Storing our workforce data

Personal data is stored in line with our data protection policy in a range of different places including in your personnel file and in IT systems including the school's email system. We maintain appropriate technical and organisational security measures, including access controls, encryption where appropriate, monitoring, cyber-security protections and staff training, designed to protect personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.



We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes relevant to your employment. Once your employment with us has ended, we will retain this file and usually delete the information in line with our retention policies (unless exceptionally there is a business need to retain it, for example in relation to safeguarding) for 6 years after the termination of your employment.

A copy of the Retention Schedule can be obtained by contacting Human Resources.

Transferring data internationally

Some of our service providers may process personal data outside the United Kingdom. Where this occurs, we will ensure that appropriate safeguards are in place in accordance with UK data protection law, such as UK adequacy regulations or approved contractual clauses. Where we send or receive personal data internationally for a specific employment-related purpose, such as an overseas reference, we will use appropriate secure methods.

The Data Protection Principles

We will process personal information lawfully, fairly and transparently; collect it for specified, explicit and legitimate purposes; ensure it is adequate, relevant and limited to what is necessary; keep it accurate and up to date; retain it only for as long as necessary; and keep it secure using appropriate technical and organisational measures.

Requesting access to your personal data

Individuals have the right to request access to information about them that we hold. This is known as making a 'Subject Access Request' (SAR). If you make a subject access request, and if we hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and 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 within a month, unless an extension is necessary on the ground of the complexity of the request

If you would like to make a Subject Access Request, please contact the Executive Support and Communications Lead at wverony@rivieraet.co.uk



Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right:

- To request to have personal data rectified if you feel that it is inaccurate or incomplete.
- To request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- To restrict our processing of personal data (i.e. permitting its storage but no further processing) under limited circumstances
- To object to processing if we are processing your information as part of our public tasks, or if it is in our legitimate interests in which case we will consider your objection, and balance this against our need to process the information.
- To object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics.
- To withdraw your consent to processing
- To have personal information, which you have provided, transmitted electronically to another organisation in certain circumstances.
- Not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect - unless you have agreed or in other limited circumstances.

Contact and Complaints

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please either contact the school office:

Oldway:	oldwayoffice@rivieraet.co.uk	01803 557190
Roselands:	roselandsadmin@rivieraet.co.uk	01803 525375
Shiphay:	shiphayadmin@rivieraet.co.uk	01803 613556

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 concern about our data processing, please raise this with us in the first instance or contact our Data Protection Officer service, Data Protection Education Ltd.

Telephone: 0800 0862018

Email: dpo@dataprotection.education



You can also complain to the ICO if you are unhappy with how we have used your data, but they generally expect you to have raised issues with us in the first instance.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>



Appendix 1 - Non-exhaustive list of examples of the types of personal data which we collect about staff

- Contact details
- Date of birth, marital status and gender, ethnic group
- Employee or teacher number
- 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
- 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, subjects taught and employment records, including work history, job titles, working hours, start date, salary information, post details, training records and professional memberships
- Performance information
- Safeguarding and safer recruitment information, including DBS and other pre-employment checks, right-to-work information, prohibition or restriction information and other information required to assess suitability to work with children, where applicable.
- Information relating to disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence
- Photographs
- CCTV footage
- Data about your use of the school's information and communications system.
- Criminal convictions and cautions where relevant and permitted by law
- We may use an online platform to live stream lessons or meetings, you will be aware of this and we will advise you if they are recorded (which is unlikely)

This list is not exhaustive. To access further details of the categories of personal information we process, please contact Human Resources.



Appendix 2 – Examples of the purposes for which we process your data

We may process data to:

- Enable you to be paid and administer pension and other benefits.
- Maintain accurate workforce records including emergency contact details and records of contractual and statutory rights.
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils.
- Operate and keep a record of absence management and other types of leave including maternity and paternity and parental leave.
- Obtain occupational health advice and ensure we are meeting obligations under health and safety law.
- Support effective performance management including training records.
- Disciplinary and grievance processes.
- Inform our recruitment and retention policies.
- Allow better financial modelling and planning.
- Enable ethnicity and disability monitoring and promote equality in the workplace.
- Improve the management of workforce data across the sector.
- Provide references.
- Respond to and defend legal claims.
- Support the work of the School Teachers' Review Body
- Deliver remote learning or meetings
- Support safeguarding, wellbeing and safer working practices.
- Maintain cyber security, information security and service resilience.
- Support secure and effective use of educational technology and digital systems.
- Investigate complaints, concerns, misconduct, safeguarding or security incidents.

This list is not exhaustive. To access further details please contact HR.



Appendix 3 – Ways in which we collect workforce information

We collect and use information about you in a variety of ways including through the recruitment process, information obtained through identity documents, from correspondence with you or through interviews, meetings or other assessments while you are working with us. The ways in which we collect workforce information may also include:

- Application forms
- Myview (payroll system)
- Data Collection sheets
- Occupational Health information.

Appendix 4 - Examples of whom we may share your data with where the law permits (non – exhaustive list)

- The Department for Education
- Safeguarding partners and multi-agency safeguarding arrangements where required by law.
- Software, cloud-hosting and educational technology providers acting on our behalf.
- Auditors, insurers, legal advisers and regulators where necessary.
- Your family or representatives
- Educators and examining bodies
- Our regulator, including Ofsted where appropriate
- Suppliers and service providers – to enable them to provide the service we have contracted them for such as payroll
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Trade unions and associations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Police forces, courts, tribunals
- Professional bodies
- Employment and recruitment agencies
- Internally with School Governors, for example if they are involved with a HR matter concerning yourself
- Occasionally with the School's Data Protection Officer, for example in relation to a subject access request





DETAILS OF AMENDMENTS

December 2020

- Updated on 17th December 2020.

April 2021

- Updated in line with One West guidance.

July 2023

- Removed any reference to named HR person – amended to generic HR
- Minor Formatting Changes
- Review Frequency amended

October 2023

- Reviewed without change

March 2024 – amendments by S.Harris (HR)

- Contents page subjects added and page numbers amended
- 'Automatic decision making' paragraph added – Page 6
- 'Pensions' paragraph added – Page 6
- 'Transferring data internationally' paragraph has been changed - Page 7

June 2025

- Minor amendments to formatting as per ICO guidance to mirror KCSIE
- Contact numbers changed/removed where updated

May 2026

- Updated with details of new DPO, Data Protection Education Ltd (from 25/5/26)
- Updated Oldway's email to oldwayoffice@rivieraet.co.uk

August 2026

- Updated following review against Data Protection Education Ltd Workforce Privacy Notice template v3.2.
- Updated DPO contact information.
- Added provisions relating to AI and automated decision-making.
- Updated cyber and information security and international data transfer provisions.
- Added Data Protection Principles.
- Updated information on workforce data collection, processing and sharing.
- Expanded safeguarding and safer recruitment data categories.
- Updated wording relating to individual rights, criminal conviction data and data sharing.



- General review and minor drafting/formatting amendments.

