



## **PRIVACY NOTICE: TRUST WORKFORCE**

Changing Lives Learning Trust (C.L.L.T. or the Trust) is the data controller for the use of personal data explained in this privacy notice.

Personal data is any information that can be used to identify a living person, either on its own, or in combination with other pieces of data. Data processing includes the collection, use, and storage of data.

### **THE CATEGORIES OF TRUST WORKFORCE INFORMATION THAT WE PROCESS INCLUDE:**

- Personal identifiers like name, address, contact details, employee or teacher number, national insurance number, and image.
- Financial information like bank account, pension, benefits, insurance, and similar details
- Special categories of data like medical information for emergency or occupational health reasons; criminal conviction or social care action information for legal and safeguarding reasons; and protected characteristics information like gender, age, ethnic group etc.
- Contract information like start dates, hours worked, post, roles, salary information, and pre-employment vetting information like references;
- Work absence information like the number of absences and reasons;
- Qualifications and, where relevant, subjects or specialisms taught.
- Safeguarding information such as DBS and other safeguarding information in order to comply with Single Central Record, photographs for ID badges.
- Performance information such as capability and disciplinary matters.
- Information obtained through electronic means such as Inventry, signing in and out procedures, Biometric – cashless catering, CCTV.

### **WHY WE COLLECT AND USE THIS INFORMATION**

We use Trust workforce data to:

- a) provide us with a comprehensive picture of our workforce, how it is deployed, how it can be developed, and kept safe;
- b) recruit appropriately, ensure human resource processes are managed effectively, and to inform the development of recruitment and retention policies;
- c) enable individuals to be evaluated and developed in their career and be paid
- d) meet statutory duties placed on us by HMRC, the Home Office, Department for Education, Department of Work and Pensions, UK Health Security Agency etc.
- e) enable individuals to access premises or services we control e.g., .system logins, using biometric recognition;
- f) celebrate or promote school, for scientific interest, or to record our own Trust history.
- g) preventing and detecting crime (use of CCTV and photographs for ID badges).

Under UK GDPR, the legal bases we rely on for processing personal workforce information are:

#### Article 6

1. Processing shall be lawful only if and to the extent that at least one of the following Applies:

- (a) Consent (for any processing which does not fall into the other bases explained below)
- (b) Contract (your contract of employment)
- (c) Processing is necessary for compliance with a legal obligation to which the controller is subject;
- (e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- (f) Legitimate interests, such as fundraising activities.

#### Article 9(2)

(b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;

1. Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.

2. Paragraph 1 shall not apply if one of the following applies:

(j) Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Further information regarding data collection can be found in the Education Act 1996 within guide documents on the following website: [Data collection and censuses for schools - GOV.UK](#)

### **COLLECTING TRUST WORKFORCE INFORMATION**

We collect personal information via: application form, equality and diversity form, pre-placement medical report, payroll form, staff data form, HMRC new starter checklist, self-disclosure form, reference request forms, qualification certificates and consent forms for use of photographic image, biometrics, disclosure of criminal offences and childcare disqualification declarations. Checks are also undertaken using the teacher regulation agency.

Workforce data is essential for the Trust's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with UK GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this.

## **STORING SCHOOL WORKFORCE INFORMATION**

We hold school workforce data securely in line with the Information and Records Management Society (IRMS) Records Management Toolkit for Schools. Most data about staff is kept for between 6 months and 6 years after an event or the ending of a contract, although some is kept for much longer e.g., first aid and accident records that also involved children. Unsuccessful applicant data is kept for 6 months after the date of appointment. For more information about how long we keep some information for and why (data retention), and how we keep the data safe, please see our Records Management Policy which is available on the shared network.

## **WHO WE SHARE SCHOOL WORKFORCE INFORMATION WITH AND WHY**

We do not share information about our workforce with anyone without consent unless the law and our policies allow us to do so. The laws listed in this notice that require us to collect information also require us to share it. Data is transferred securely by hand delivery or registered post, via a government data transfer system like School to School, via a contractor's secure data sharing system like our online school trips safety system, and sometimes in other secure ways.

We share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring (see next section).

We also share school workforce information with:

- Within our Trust to monitor and share practice, benchmark locally, and to make decisions about workforce distribution and development.
- the Local Government Pension scheme (Your Pension Service) and Teacher Pension Scheme to manage pension contributions;
- HMRC for legal and tax reasons;
- organisations involved with our children like the local authority or other partner professionals who need the names, job titles, contact details and perhaps qualifications of our employees, the places we take children to on trips who might need more personal information like next of kin and medical needs, and workforce development organisations like training providers;
- Government departments like UK Health Security Agency, local authority public health, and District Council Environmental Health Departments to comply with the law and support public health action;
- Occupational Health and similar staff support services only with the consent of the individual.

## **DEPARTMENT FOR EDUCATION**

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our children and young people with the Department for Education (DfE) for the purpose of those data collections, under:

We are required to share information about our school employees with the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

All data is transferred securely and held by DfE under a combination of software and hardware controls which meet the current [government security policy framework](#).

For more information, please see 'How Government uses your data' section.

## **REQUESTING ACCESS TO YOUR PERSONAL DATA**

Under UK GDPR, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the Trust's DPO at [dataprotection@changinglives.education](mailto:dataprotection@changinglives.education).

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request, data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances.
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commissioner if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at [raise a concern with ICO](https://ico.org.uk)

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

## **WITHDRAWAL OF CONSENT AND THE RIGHT TO LODGE A COMPLAINT**

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the Trust's DPO at [dataprotection@changinglives.education](mailto:dataprotection@changinglives.education).

## **LAST UPDATED**

This privacy notice was compiled using [DfE advice and model documents](#). We may need to review it periodically, so we recommend that you revisit this information from time to time. This version was last updated on 1<sup>st</sup> August 2025.

## **CONTACT**

If you would like to discuss anything in this privacy notice, please contact the Trust's DPO at [dataprotection@changinglives.education](mailto:dataprotection@changinglives.education).

## **HOW GOVERNMENT USES YOUR DATA**

The workforce data that we lawfully share with the DfE through data collections:

- informs departmental policy on pay and the monitoring of the effectiveness and diversity of the school workforce
- links to school funding and expenditure
- supports 'longer term' research and monitoring of educational policy

## **DATA COLLECTION REQUIREMENTS**

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

## **SHARING BY THE DEPARTMENT**

The Department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department for Education (DfE) will only share your personal data where it is lawful, secure and ethical to do so and has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether the Department for Education (DfE) releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of public benefit, proportionality, legal underpinning and strict information security standards.

For more information about the Department for Education's (DfE) data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the Department for Education (DfE) has provided information, (and for which project) please visit the following website: <https://www.gov.uk/government/publications/dfe-external-data-shares>.

## **HOW TO FIND OUT WHAT PERSONAL INFORMATION DFE HOLD ABOUT YOU**

Under the terms of the Data Protection Act 2018, you're entitled to ask the Department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below: [www.gov.uk/government/organisations/department-for-education/about/personal-information-charter](http://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter)

To contact the department: [www.gov.uk/contact-dfe](http://www.gov.uk/contact-dfe).