MOSAIC SCHOOLS LEARNING TRUST

PRIVACY NOTICE FOR STAFF

All schools in Mosaic Schools Learning Trust are committed to safeguarding and promoting the welfare of children and young people and expect all staff and volunteers to share this commitment.

Staff Responsible:	DPO
Approved by:	Board of Trustees
Date of Review:	September 2025
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VERSION CONTROL

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1. Introduction

Under UK data protection law, individuals have a right to be informed about how our Trust uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing 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 within our Trust**.

Our Trust, Mosaic Schools Learning Trust, based at Towncourt Lane, Petts Wood, BR5 1EL, is the 'data controller' for the purposes of data protection law.

For details of our Data Protection Officer (DPO), please see the "contact us" section below.

2. The personal data we hold

We process data relating to those that we employ or otherwise engage to work within our Trust. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Personal information (such as name, employee or teacher number, national insurance number)
- Characteristics information (such as date of birth, marital status and gender)
- Next of kin and emergency contact numbers
- Contract information (such as salary, annual leave, hours worked, roles, 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 and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Identity documents
- Data about your use of the Trust's information and communication systems

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Any health conditions you have that we need to be aware of
- Sickness records such as number of periods of absence
- Race and/or ethnicity
- Photographs and CCTV images captured in school

- Trade union membership

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

3. Why we collect and use this data

We collect and use the data listed above to help us to run the Trust, including to:

a) Enable you to be paid

b) Facilitate safer recruitment, as part of our safeguarding obligations towards pupils

c) Support effective performance management

d) Inform our recruitment and retention policies

e) Allow better financial modelling and planning

f) Enable equalities monitoring

g) Improve the management of workforce data across the sector

h) Support the work of the School Teachers' Review Body

i) Manage sickness absence

3.1 Use of your personal data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

4. Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. We process this information under Article 6 & Article 9 of the General Data Protection Regulations (UK GDPR) on one of the following bases:

- Legitimate Interest: processing is carried out in the course of the school's legitimate activities
- Contract: the processing is necessary for the contract the school has with the individual
- Legal obligation: the processing is necessary for the school to comply with the law (not including contractual obligations)
- Public task: the processing is necessary for the school to perform a task in the public interest or for official functions, and the task or function has a clear basis in law
- For data collection purposes (Departmental Censuses) under the Education Act 1996 – this information can be found in the guide documents on the following website https://www.gov.uk/education/data-collection-and-censuses-for-schools

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 we are requesting consent, and will explain how to go about withdrawing consent should 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 Trust's use of your data.

Sometimes, you might provide us with another person's personal data – e.g. details of your emergency contact or next of kin. In such cases, we require you to inform that individual what personal data of theirs you are giving to us. You must also give them our contact details and let them know that they should contact us if they have any queries about how we will use their personal data.

4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis and one of the following conditions for processing as set out in data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights

- We need to process it for reasons of substantial public interest as defined in legislation.

5. Collecting this data

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

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.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals

6. How we store this data

We create and maintain an employment file for each member of staff, and we keep personal information about you while you work at our school. We may also keep it beyond your employment at our school if this is necessary. Our record retention schedule sets out how long we keep information about staff. A copy of the retention schedule is available on request from the DPO.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

7. Who we share data with

We do not share information about you with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with:

- The local authority appropriate to any one of our schools – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- The Department for Education – to perform tasks in the public interest
- Your family or representatives – to perform tasks in the public interest
- Educators and examining bodies – to perform tasks in the public interest
- Our regulator Ofsted – to perform tasks in the public interest
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as HR, payroll, IT provision

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- Financial organisations – to enable them to provide the service we have contracted them for, such as Teachers Pensions and the Local Government Pension Scheme
- Central and local government - to perform tasks in the public interest
- Our auditors – to meet our legal obligations to share certain information with them
- Survey and research organisations – to perform tasks in the public interest
- Health authorities – to perform tasks in the public interest
- Security organisations – to perform tasks in the public interest
- Health and social welfare organisations – to perform tasks in the public interest
- Professional advisers and consultants – to perform tasks in the public interest
- Charities and voluntary organisations – to perform tasks in the public interest
- Police forces, courts, tribunals – to meet our legal obligations to share certain information with them
- If we are considering restructuring the Trust (by way of merger or otherwise), we may share your information with the other parties involved (such as the local authority, the Department for Education and/or the other academy trust/school(s) involved) and with the relevant professional advisors – to perform tasks in the public interest and legal obligation.
- If you choose to participate in voluntary staff benefit or discount schemes offered by our organisation or through third-party providers, we may collect and share relevant personal data (such as your name, work email address, and employment status) with the scheme providers in order to facilitate your access to these services.

7.1 Transferring data internationally

Where we transfer your personal data to a country or territory outside the European Economic Area, we will do so in accordance with UK data protection law.

7.2 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 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.

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

For privacy information on the data the Department for Education (DfE) collects and uses, please see: https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers.

How Government Uses your data

The workforce data that we lawfully share with the Department for Education (DfE) through data collections:

- informs the Department for Education (DfE) 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 (DfE) 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 for Education (DfE)

The Department for Education (DfE) 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 the Department for Education (DfE) hold about you

Under the terms of UK GDPR, you are entitled to ask the Department for Education (DfE):

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they are 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 for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published

at the address below:

https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter

or

https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights

To contact the Department for Education (DfE): https://www.gov.uk/contact-dfe

8. Retention Periods

Except as otherwise permitted or required by applicable law or regulation, the Trust only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

To determine the appropriate retention period for personal data, the Trust considers the amount, nature, and sensitivity of personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for processing the personal data, whether we can fulfil the purposes of processing by other means and any applicable legal requirements.

Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with our Data Retention Policy. All data that is held is securely destroyed at the end of the retention period.

The Trust typically retains personal data for 6 years subject to any exceptional circumstances or to comply with laws or regulations that require a specific retention period. Full details of all retention periods are detailed on the Trust Retention Schedule, a copy of which can be obtained from the DPO.

9. Your rights

9.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you. If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- 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
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances. If you would like to make a request, please contact us (see 'Contact us' below).

9.2 Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data, and can withdraw consent at any time
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

- Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task
- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests
- Right to object to use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent

See information on types of lawful basis in section 4 of this privacy notice.

To exercise any of these rights, please contact us (see 'Contact us' below).

10. Complaints

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.

Alternatively, you can make a complaint to the Information Commissioner's Office:

Report a concern online at https://ico.org.uk/make-a-complaint/

Call 0303 123 1113

Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

11. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**: dpo@mslt.org.uk

This notice is based on the Department for Education's model privacy notice for the school workforce, amended to reflect the way we use data in this school.