Privacy Notices:

The NLLT workforce: those employed to teach, or otherwise engaged to work at, a school, Trust or a local authority

All personal data will be respected and protected.

Who processes your information?

Northern Lights Learning Trust and its academies are the data controllers and hold the legal right to collect and use personal data you provide to us. This means they determine the purposes for which, and the manner in which, any personal data relating to staff is to be processed. A representative of the trust, the Chief Finance Officer

Hayley Swinhoe is the Senior Data Protection Lead (SDPL). Their role is to oversee and monitor the trusts data processing practices. This individual can be contacted on 0191 5947033 (option 2) or via email: Hayley.Swinhoe@nllt.co.uk

What categories of information are processed?

The categories of personal information that we process include the following:

- Personal information – e.g. name, employee or teacher number, National Insurance number, address and contact details, bank account details and tax status
- Characteristics information – e.g. gender, age, ethnic group
- Contract information – e.g. start date, hours worked, post, roles, salary information, pension membership, and annual leave
- Work absence information – e.g. number of absences and reasons for absence
- Qualifications and, where relevant, the subjects taught, training records and professional memberships
- Medical information
- Recruitment information, including copies of right to work documentation, references and other information including a cover letter as part of the application process

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

- Photographs and CCTV images captured in school
- Information about trade union membership

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

This list is not exhaustive and the trust may collect other information about its employees required and will make the use of this information clear.

Why do we need your information?

Northern Lights Learning Trust and its academies have a legal right and a legitimate interest to collect and process personal data relating to those we employ to work at the school, or those otherwise contracted to work at the school.

We collect and use your information to:

- enable the development of a comprehensive picture of the workforce and how it is deployed
- inform the development of the recruitment and retention policies

- meet the safeguarding requirements set out in UK employment and childcare law, including those in relation to the Academy Funding Agreements, Academy's legal framework, Safeguarding Vulnerable Groups Act 2006 or The Childcare (Disqualification) Regulations 2009. Staff members' personal data is also processed to assist in the running of the trust, and to enable individuals to be paid in accordance with the legal basis of contract.

If staff members fail to provide their personal data, there may be significant consequences. This includes the following:

- Salary will not be paid
- Pension details unable to be processed
- Jeopardise offer of employment as unable to fulfil safeguarding and identity checks

For which purposes are your personal data processed?

In accordance with the above, staff members' personal data is used for the following reasons:

- Contractual requirements
- Employment checks, e.g. right to work in the UK
- Salary requirements
- Maternity pay
- Sickness pay

- Pension information
- HMRC data
- Statutory statistical returns [DfE, ESFA]

Which data is collected?

The personal data the school will collect from the school workforce includes the following:

- Names
- National insurance numbers
- Characteristics such as ethnic group
- Employment contracts
- Remuneration details
- Qualifications
- Absence information

The collection of personal information will benefit both the DfE and LA and we routinely share your information with them. This allows us

- Improving the management of workforce data across the sector.
- Enabling the development of a comprehensive picture of the workforce and how it is deployed.
- Informing the development of recruitment and retention policies.
- Allowing better financial modelling and planning.
- Enabling ethnicity and disability monitoring.
- Supporting the work of the school teachers' review body.

We do not currently process any staff members' 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.

We are required to share information about our school workforce with our LA or DFE under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

All information we share with the DfE is transferred securely and held by the DfE under a combination of software and hardware controls which meet the current government security policy framework.

How does the government use your data?

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

- Informs the DfE's 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.

You can find more information about the data collection requirements placed on us by the DfE by following this link https://www.gov.uk/education/data-collection-and-censuses-forhttps://www.gov.uk/education/data-collection-and-censuses-for-schoolsschools.

The DfE may share your information with third parties who promote the education or wellbeing of pupils or the effective deployment of staff by:

- Conducting research or analysis.
- Producing statistics.
- Providing information, advice or guidance.

The DfE has robust processes in place to ensure that the confidentiality of personal information is maintained and there are controls in place regarding access to and use of the information. The DfE makes decisions on whether they will share personal information with third parties based on an approval process, where the following areas are considered in detail:

- Who is requesting the information?
- The purpose for which the information is required.
- The level and sensitivity of the information requested.
- The arrangements in place to securely store and handle the information.

To have access to school workforce information, organisations must comply with strict terms and conditions covering the confidentiality and handling of information, security arrangements and retention of the information.

How to find out what personal information the DfE holds about you

Under the Data Protection Act 2018, you are entitled to ask the DfE what personal information it holds about you. You have the right to ask the DfE:

- If it processes your personal data.
- For a description of the data it holds about you.
- The reasons it is holding your data and any recipient it may be disclosed to.
- For a copy of your personal data and any details of its source.

To exercise these rights, you should make a subject access request. Information on how to do this can be found by following this link:
https://www.gov.uk/government/organisations/department-for-education/about/personalhttps://www.gov.uk/government/organisations/department-for-education/about/personal-information-charterinformation-charter

You can also contact the DfE directly using its online contact form by following this link:
https://www.gov.uk/contact-dfe

Will your personal data be sought from third parties?

Staff members' personal data is only sought from the data subject. No third parties will be contacted to obtain staff members' personal data without the data subject's consent.

Staff members' personal data may be obtained and processed from third parties where the law requires the school to do so, e.g. medical records from a GP. The categories of data obtained and processed from third parties include:

- **Medical data**
- **HMRC data**
- **Pension Information**
- **DBS/employment checks**
- **References / employment checks**
- **DfE**

This list is not exhaustive and may change with legislation and guidance.
Where data is obtained from third parties, the personal data originates from the following sources:

- **DfE**
- **Capita**
- **DWP**
- **NHS**
- **HMRC**
- **Previous employers**
- **Police forces, courts or tribunals**
- **Local Authorities**

This list is not exhaustive and may change with legislation and guidance.

How is your information stored?

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 retentions schedule sets out how long we keep information about staff.

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.

How is your information shared?

Northern Lights Learning Trust will not share your personal information with any third parties without your consent, unless the law and our policies allow us to do so.

We are required, by law, to pass on some personal information to our LA and the DfE. This includes information to complete statistical returns and workforce census.

How long is your data retained for?

Staff members' personal data is retained in line with Northern Lights Learning Trust Records Management Policy/Retention Schedule.

Personal information may be retained for the following periods depending on the nature of the information. Data will only be retained for as long as is necessary to fulfil the purposes for which it was processed, and will not be retained indefinitely.

If you require further information regarding retention of data, and the periods for which your personal data is held for, please download our Records Management Policy/Retention Schedule.

What are your rights?

As the data subject, you have specific rights to the processing of your data.

You have a legal right to:

- Request access to the personal data that Northern Lights Learning Trust holds.
- Restrict our processing of your personal data, i.e. permitting its storage but no further processing.
- Object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics.
- Have your personal data rectified if it's inaccurate or incomplete
- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.
- Request that your personal data is erased where there is no compelling reason for the continued processing.
- Seek compensation, either through the ICO or the courts.

Where the processing of your data is based on your explicit consent, you have the right to withdraw this consent at any time. This will not affect any personal data that has been processed prior to withdrawing consent.

Staff members also have the right to lodge a complaint with the Information Commissioner's Office (ICO) in relation to how Northern Lights Learning Trust processes their personal data.

How can you find out more information?

If you change your mind or unhappy with how our trust uses your personal data or you would like to discuss anything in this privacy notice please contact Hayley Swinhoe, Chief Finance Officer on 0191 5947033 (option 2) or by emailing Hayley.Swinhoe@nllt.co.uk

If you require further information about how we and/or the DfE store and use your personal data, please visit the Gov.UK website, or download our GDPR Data Protection Policy from EVERY. ----------

Employee Declaration

I, _____, declare that I understand, that by confirming I have read and understood this privacy notice on EVERY, I agree that:

- Northern Lights Learning Trust has a legal and legitimate interest to collect and process my personal data in order to meet statutory and contractual requirements.
- There may be significant consequences if I fail to provide the personal data Northern Lights Learning Trust requires.
- Northern Lights Learning Trust may share my data with the DfE, and subsequently the LA.
- Northern Lights Learning Trust will not share my data to any other third parties without my consent, unless the law requires the school to do so.
- the nature and personal categories of this data, and where the personal data originates from, where my data is obtained from third parties.
- My data is retained in line with Northern Lights Learning Trust's Records Management Policy.
- My rights to the processing of my personal data.

Name of staff member: _____

Signature of staff member: _____
Date: _____

Where necessary, third parties may be responsible for processing staff members' personal information. Where this is required, the school places data protection requirements on third party processors to ensure data is processed in line staff members' privacy rights.

The collection of this information will benefit both national and local users by:

- improving the management of workforce data across the sector
- enabling development of a comprehensive picture of the workforce and how it is deployed
- informing the development of recruitment and retention policies
- allowing better financial modelling and planning
- enabling ethnicity and disability monitoring; and
- supporting the work of the School Teachers' Review Body

This personal data includes identifiers such as names and National Insurance numbers and characteristics such as ethnic group, employment contracts and remuneration details, qualifications and absence information.

We will not share information about you with third parties without your consent unless the law allows us to.

We are required, by law, to pass on some of this personal data to:

- the Department for Education (DfE)

If you require more information about how we and/or DfE store and use your personal data please visit:

- https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

If you want to see a copy of the information about you that we hold, please submit a Subject Access Request to the Data Protection Lead, Hayley Swinhoe, via email, marked **Subject Access Request in the title field.**

The named Data Protection Officer (DPO) for Northern Lights Learning Trust is:
GDPR Sentry. You can contact the DPO via the following email: **info@gdprsentry.com** or by telephone: 0113 8042035.