Staff Privacy Notice

September 2026

Privacy Notices:
The School Workforce:
those employed to teach, or otherwise engaged to work at Focus Trust

The Data Protection Act 2018: How we use your information

We process personal data relating to those we employ to work at, or otherwise engage to work at, Focus-Trust. This is for employment purposes to assist in the running of the Trust and/or to enable individuals to be paid.

The Education Act 1996, Article 6 and Article 9 of the UK General Data Protection Regulation 2018 (GDPR) provide some of the underpinning purposes for data collection.

Why we share staff information
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 are required by law and the UK GDPR, to pass on some of this personal data to:

- Working with Schools
- Fusion Education/SAM People (HR MIS)
- Department for Education (DfE)
- HMRC

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

If you require more information about how the 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 information about you that we hold, please contact:
The School Business Manager

Our commitment to you

As an employer Focus-Trust must meet its contractual, statutory and administrative obligations. We are committed to protecting your privacy and will only use personal data that we collect in line with all applicable laws, including the UK General Data Protection Regulation (GDPR).

This privacy notice tells you what to expect when Focus-Trust collects personal information about you. It applies to all employees, ex- employees, agency staff, contractors, secondees and non-executive directors. However, the information we will process about you will vary depending on your specific role and personal circumstances.

Focus-Trust is the controller for this information unless this notice specifically states otherwise.
ICO Reference Z3474517
If you want to request further information about this privacy policy or exercise any of your rights, please contact our Data Protection Officer on 07867 423 870 leaving a message with you name and contact details or by email to info@focus-trust.co.uk and the DPO will respond to you.

Scope

This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you during your employment.

We are required to notify you of this information under data protection legislation. Please ensure that you read this notice and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects the information

Focus-Trust is a 'data controller' and collects and processes personal data relating to its employees to manage the employment relationship. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

About the information we collect and hold

We may collect the following information during your employment:

- Your name, contact details (i.e. address, home and mobile phone numbers, email address) and emergency contacts (i.e. name, relationship and home and mobile phone numbers);
- Information collected during the recruitment process that we retain during your employment;
- Employment contract information;
- Details of salary and benefits, bank/building society, National Insurance and tax information, your age;
- Details of your spouse/partner and any dependents;
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information;

• A copy of your driving licence;

• Details of your pension arrangements, and all information included in these and necessary to implement and administer them;

• Information in your sickness and absence records (including sensitive personal information regarding your physical and/or mental health);

• Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs;

• Criminal records information, including the results of Disclosure and Barring Service (DBS) checks;

• Your trade union membership;

• Information on grievances raised by or involving you;

• Information on conduct and/or other disciplinary issues involving you;

• Details of your appraisals and performance reviews;

• Details of your performance management/improvement plans (if any);

• Details of your time and attendance records;

• Information regarding your work output;

• Information in applications you make for other positions within our organisation;

• Information about your use of our IT, communication and other systems, and other monitoring information;

• Details of your use of business-related social media, such as LinkedIn;

• Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur); and

• Details in references about you that we give to others.

• Your photograph i.e. for your ID badge or for promotional material.

Certain of the categories above may not apply to you if you are an agency worker, independent contractor, freelancer, or intern.

How we collect the information?

We may collect this information from you, your personnel records, the Home Office, HMRC, pension administrators, your doctors, medical and occupational health professionals we engage with and from our insurance benefit administrators, the DBS, your trade union, other employees, and other professionals we may engage, e.g. to advise us generally and/or in relation to any legal matters regarding your employment. This will include (but is not limited to) Cloud based and internal systems,

such as servers, computers, networks, access control systems, for example door entry systems, swipe card systems, automated monitoring of our network activity. We may also store information about the use of our communications systems, remote access systems, email and unified messaging systems, internet, intranet, telephony and mobile devices. This information may be collected directly by Focus-Trust, or on its behalf by authorised data processors (To assist Focus-Trust in ensuring a safe and secure ICT environment, and protect the data we have been entrusted with, e.g. Service Providers).

Why we collect the information, our lawful basis and how we use it

We must have a lawful basis for processing your information; this will vary on the circumstances of why we process and how we use your information. We will typically collect and use this information for the following purposes (other purposes that may also apply are explained in our data protection policy:

- DPA Schedule 1 (1) (a)the processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security

- DPA Schedule 1(2) (b) the processing is necessary for health or social care purposes, preventative or occupational medicine, assessment of the working capacity of the employee, medical diagnosis, the provision of health care and treatment, the provision of social care

Article 6 (1)

- Article 6(1)(b for the performance of a contract with you, or to take steps to enter into a contract for example during your employment with us;

- Article 6(1)(c)for compliance with a legal obligation (e.g. our obligations to you as your employer under employment protection and health & safety legislation, and under statutory codes of practice, such as those issued by ACAS and the legal requirements to evidence a 'right to work'); and

- Article 6(1)(f)for the purposes of our legitimate interests or those of a third party, but only if these are not overridden by your interests, rights or freedoms.

- Article 6(1)(e) for the purposes of public interests.

if we process any special categories of information (i.e. information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, processing of genetic or biometric data for the purpose of uniquely identifying individuals, health data, or data concerning your sex life or sexual orientation), we must have a further lawful basis for the processing. This could include:

- Article9(2)(b) the processing is necessary for the purposes of carrying out our obligations and exercising our specific rights as a data 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 UK legislation

- Article 9(2)(c) the processing is necessary to protect your vital interests or someone else's vital interests, e.g. where the data subject is physically or legally incapable of giving consent

- Article 9(2)(f) the processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity

- Article 9(2)(j)the processing is necessary for reasons of substantial public interest, for the purposes of preventive or occupational medicine, for the assessment of the working capacity of an employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services based on legislation or pursuant to contract with a health professional and subject to the conditions and safeguards

Article 9(2)(a)you give us your explicit consent to do so.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

Artificial Intelligence (AI)

Focus-Trust recognise the rapid development and use of Artificial Intelligence (AI) tools within education. AI should enhance teaching and pupil learning if used transparently and ethically. For further details on how we use AI please see our AI Policy.

How long we keep your information

We keep your information during and after your employment for no longer than is necessary for the purposes for which the personal information is processed. Further details on this are available in our information retention policy.

Your Data Protection Rights

We take the protection of your personal data very seriously and respect your privacy in accordance with data protection legislation and best practice. You have rights relating to your personal information. You can find more information about your privacy rights on the Information Commissioner's Office website www.ico.org.uk.

You have the right to be informed about how and why we process your personal information. Any time you give us personal information you have the right to be informed about why we need it, who will have access to it and how we'll use it.

You can find most of the information you need in this Privacy Notice.

Your privacy rights

As a data subject, you have several rights. You have the right:

- to be informed about the collection and use of your personal data
- to access your personal data and supplementary information on request
- to have inaccurate personal data rectified, or completed if it is incomplete
- to have personal data erased i.e. the right to be forgotten

• to request the restriction or suppression of your personal data

• to obtain the personal data you have provided to us and is stored electronically

• to object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing.

Access to personal information

We try to be as open as we can be in allowing people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the UK General Data Protection Regulation. If we do hold information about you, we will:

· give you a description of it;

· tell you why we are holding it;

· tell you who it could be disclosed to if appropriate; and

· let you have a copy of the information in an intelligible form

· inform you of the right to complain to the Information Commissioners Office.

To make a request to Focus-Trust for any personal information we may hold about you, you should contact our Data Protection Officer on 07867 423 870 leaving a message with you name and contact details or by email to info@focus-trust.co.uk and the DPO will respond to you.

If you would like to exercise any of these rights, please contact a member of the HR team who will provide you with further information.

Keeping your personal information secure

Your information may be shared internally, including with members of the HR team (including payroll), your line manager, managers in the business area in which you work and IT staff if access to the data is necessary for performance of their roles.

Focus-Trust shares your data with third parties; for example, to obtain pre-employment references from other employers, obtain employment background checks from third-party providers and obtain necessary criminal records checks from the Disclosure and Barring Service. We may also share your data with third parties in the context of any sale of some or all our business. In those circumstances the data will be subject to strict confidentiality arrangements.

Focus-Trust also shares your data with third parties that process data on its behalf, in connection with the provision of benefits and the provision of occupational health services, for example your pension provider, or Occupational Health as part of your pre-employment checks.

Focus-Trust does not transfer your data to countries outside the European Economic Area.

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal

information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

Focus Trust strives to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate via your line manager/headteacher. We would also welcome any suggestions for improving our procedures. We understand in line with the Data Use and Access Act we must take steps to help you if you wish to make complaint about how we use your personal information. We will supply an electronic form, acknowledge your complaint within 30 days and respond to it without undue delay.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive details of all aspects of the collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to: info@focus-trust.co.uk

* Data Protection Requirements means the Data Protection Act 2018, the UK General Data Protection Regulation, the Regulation of Investigatory Powers Act 2000, the Telecommunications (Lawful Business Practice)(Interception of Communications) Regulations 2000 (SI 2000/2699), the Electronic Communications Data Protection Directive 2002/58/EC, the Privacy and Electronic Communications (EC Directive) Regulations 2003, the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 and all other applicable laws and regulations relating to processing of personal data and privacy in any applicable jurisdiction as amended and replaced, including where applicable the guidance and codes of practice issued by the UK Information Commissioner or such other relevant data protection authority.