



Employee Privacy Notice

Adopted By: Board of Trustees

Date: September 2025

Review Date: September 2026

Employee Privacy Notice

Date of Issue:	September 2025
Policy applies to:	All staff employed by the Wessex Multi-Academy Trust.
Policy Version Number:	3
Purpose of the document:	To provide guidance on how Wessex MAT hold and process data, the rights of the data subject, our obligations when obtaining, handling, processing or storing personal data for and on behalf of the Wessex MAT.
Summary of the main points:	The document provides guidance as to collection, handling and processing of personal data, individuals rights under data protection legislation, data sharing and storage and retention of personal data.
Approved by:	This policy has been approved by the Wessex MAT Board of Trustees
Reviewer:	Data Protection Officer
Summary of amendments:	Amendments to sections 1.1, 1.2, 2.5, 4.3, 4.4, 5.1
Next review due:	September 2026

Employee Privacy Notice (GDPR Compliant)

Data controller: Wessex Multi-Academy Trust
Wessex House
4 Poundbury Business Centre
Holmead Walk
Poundbury
Dorset
DT1 3GE

Wessex Multi-Academy Trust 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.

1. What information does the Trust collect?

1.1. We collect and processes a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number, DoB and gender
- your image in photographic and video form from CCTV as applicable
- the terms and conditions of your employment
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with us
- details of your remuneration, including entitlement to benefits such as pensions or insurance cover
- details of your bank account and national insurance number
- information about your marital status, next of kin, dependants and emergency contacts
- information about your nationality and entitlement to work in the UK
- information about your criminal record**

- details of your schedule (days of work and working hours) and attendance at work
 - details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave
 - details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence
 - assessments of your performance, including appraisals, performance reviews and ratings, performance improvement plans and related correspondence
 - information about your use of IT, communications and other systems, and other monitoring which may include the use of CCTV;
 - 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)
 - information about medical or health conditions, including whether or not you have a disability for which we need to make reasonable adjustments; and
 - equal opportunities monitoring information including information about your ethnic origin, sexual orientation and religion or belief.
- 1.2. We may collect this information in a variety of ways. For example, data might be collected through application forms, CVs or resumes; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment (such as benefit nomination forms); from correspondence with you; from medical and occupational health professionals we engage and from our insurance benefit administrators, the DBS, consultants and other professionals we may engage, eg to advise us generally automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, and instant messaging systems, intranet and Internet facilities, telephones, voicemail, mobile phone records or through interviews, meetings or other assessments.
- 1.3. In some cases, we may collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law.
- 1.4. Data will be stored in a range of different places, including in your personnel file, in the HR management systems and in other IT systems (including our email system).

2. Why does the Trust process personal data?

- 2.1. We need to process data to enter into an employment contract with you and to meet our obligations under your employment contract. For example, we need to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer benefits, such as pension and insurance entitlements.
- 2.2. In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled.
- 2.3. In other cases, we have a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows us to:
 - run recruitment and promotion processes;
 - maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
 - operate and record disciplinary & grievance processes, to ensure acceptable workplace conduct;
 - operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
 - operate and keep a record of absence, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
 - obtain occupational health advice, to ensure that we comply with duties in relation to individuals with disabilities, meet our obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
 - operate and keep a record of other types of leave (including maternity, paternity, adoption and parental leave), to allow effective workforce management, to ensure that we comply with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or benefits to which they are entitled;

- ensure effective general HR and business administration;
- provide references on request for current or former employees; and
- respond to and defend against legal claims.

2.4. Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities). Where we process other special categories of personal data, such as information about ethnic origin, sexual orientation or religion or belief, this is done for the purposes of equal opportunities monitoring. Data that we use for these purposes is pseudonymised or is collected with the express consent of employees, which can be withdrawn at any time. Employees are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

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

3. Who has access to data?

3.1. Your information may be shared internally, including with members of the recruitment team, 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.

3.2. We share your data with third parties in order to obtain pre-employment references from other employers, obtain employment background checks from third-party providers and obtain necessary criminal records checks from the DBS. We may also share your data with third parties in the context of a sale of some or all of our business. In those circumstances the data will be subject to confidentiality arrangements.

3.3. We also share your data with third parties that process data on our behalf: in connection with payroll, the provision of benefits such as pensions and childcare vouchers and the provision of health insurance. We may also share your data with third parties that provide professional services such as specialist employment law guidance. We will not transfer your data to countries outside the European Economic Area.

4. How does the Trust protect data?

4.1. We take the security of your data seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties.

4.2. Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to

implement appropriate technical and organisational measures to ensure the security of data.

4.3. Those processing your data will do so only in an authorised manner and are subject to a duty of confidentiality.

4.4. 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.

5. For how long does the Trust keep data?

5.1. We keep your data during and after your employment for no longer than is necessary for the purposes for which the personal data is processed. Further details on this are available in our *data retention policy that gives these details*. We may also retain and use your personal data in relation to the legitimate interests we have and for the establishment, exercise or defence of legal claims, such as defending any legal claims that may be brought against us in connection with your employment, or in establishing, bringing or pursuing any claim against you, eg to enforce post-termination restrictions. This will typically involve passing data on to our legal advisers, who will be under strict professional and contractual duties of confidentiality.

6. Your rights

6.1. As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require us to change incorrect or incomplete data;
- require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing.

6.2. If you would like to exercise any of these rights, please contact your Data Protection Lead. If you believe that we have not complied with your data protection rights we would always welcome the opportunity to discuss this with you in the first instance or you are able to contact the Information Commissioner-www.ico.org.uk.

7. What if you do not provide personal data?

- 7.1. You have some obligations under your employment contract to provide us with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide us with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.
- 7.2. Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable us to enter a contract of employment with you. If you do not provide other information, this will hinder our ability to administer the rights and obligations arising as a result of the employment relationship efficiently.
- 7.3. Employment decisions are not based solely on automated decision-making.
- 7.4. Where we have requested a photograph of employee/ volunteers or interns this will be used for security purposes, for internal staff information and where applicable health and safety and/ or safeguarding purposes. We may also use photographs taken on other occasions for marketing purposes, but you will be advised of when these photographs will be taken.

8. Changes to this Privacy Notice

- 8.1. We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact your school's Data Protection Lead.

I, _____ (employee/worker/contractor name), acknowledge that on _____ (date), I received a copy of Wessex Multi-Academy Trust Privacy Notice for employees, workers and contractors and that I have read and understood it.

Paper copies may be out of date