



# **Altus Education Partnership**

## **Staff Fair Processing Notice**

Last updated: 17<sup>th</sup> March 2022

Version: 5

Document owner: DPO

## 1. **What is this document and why should you read it?**

- 1.1 This privacy notice explains how and why Altus Education Partnership (the trust) uses personal data about our employees, staff, contractors, trainees, officers, consultants, and temporary or agency workers (referred to as "**you**").
- 1.2 The Trust includes Edgar Wood Academy, Rochdale 6<sup>th</sup> Form College and Kingsway Park High School.
- 1.3 You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances in the future.
- 1.4 This notice does not form part of your contract of employment or any other contract to provide services.

## 2. **The Trust's data protection responsibilities**

- 2.1 "**Personal data**" is any information that relates to an identifiable natural person. Your name, address, contact details, salary details and CV are all examples of your personal data, if they identify you.
- 2.2 The term "**process**" means any activity relating to personal data, including, by way of example, collection, storage, use, consultation, and transmission.
- 2.3 The Trust is a "**controller**" of your personal data. This is a legal term – it means that we make decisions about how and why we process your personal data, and, because of this, we are responsible for making sure it is used in accordance with data protection laws.
- 2.4 You also have responsibilities whenever you process personal data in connection with the performance of your role at the Trust; these are outlined in the **Trust's Data Protection Policy**

## 3. **What types of personal data do we collect and where do we get it from?**

- 3.1 We collect many different types of personal data about you for lots of reasons. We cannot administer our employment or other relationship with you without your personal data. Where we do not need your personal data, we will make this clear, for instance we will explain if any data fields in our application or staff survey processes are optional and can be left blank.
- 3.2 Further details of the personal data we collect, where we get it from and what we do with it are set out in **Schedule 1**.
- 3.3 You provide us with personal data directly when you apply for a job with us, when you complete our Trust Application Form or correspond with us and in the course of performing your job. We also create some personal data ourselves and obtain some personal data from other sources. We obtain it from other people and organisations, including some public sources, such as publicly available directories and online resources, your emergency contacts, your use of Trust provided assets, systems and platforms, your line manager and co-workers, your dependants, and beneficiaries, third party benefits providers. You can read more about the sources of personal data in the more detailed information set out in as explained in **Schedule 1**.

3.4 If any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting your line manager.

#### 4. **What do we do with your personal data, and why?**

4.1 We process your personal data for particular purposes in connection with your employment or engagement with us, and the management and administration of our business.

4.2 We are required by law to always have a permitted reason or justification (called a "lawful basis") for processing your personal data. There are **six** such permitted lawful basis for processing personal data. The table at **Schedule 2** sets out the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

4.3 Please note that where we have indicated in the table at **Schedule 2** that our processing of your personal data is either:

4.3.1 necessary for us to comply with a legal obligation; or

necessary for us to take steps, at your request, to potentially enter into an employment contract with you, or to perform it and you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract of employment or engagement with you.

4.4 We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports.

4.5 The Trust also has the legal right and a legitimate interest to collect and process personal data relating to those we employ to work at our Trusts, or those otherwise contracted to work at our Trusts. We process personal data in order to meet the requirements set out in UK employment, Trust and safeguarding law, including those in relation to the following:

4.5.1 Trust Funding Agreement and Articles of Association

4.5.2 Trust's legal and statutory framework

4.5.3 Safeguarding Vulnerable Groups Act 2006

4.5.4 The guidance "Keeping Children Safe in Education"

4.5.5 The Childcare (Disqualification) Regulations 2009

4.6 The collection of this information benefits both national and local users by:

4.6.1 improving the management of workforce data across the sector

4.6.2 enabling development of a comprehensive picture of the workforce and how it is deployed

4.6.3 informing the development of recruitment and retention policies

4.6.4 allowing better financial modelling and planning

4.6.5 enabling ethnicity and disability monitoring

4.6.6 supporting the work of the Trust Teachers' Review Body

## 5. **Special category personal data (including criminal data)**

5.1 We are required by law to treat certain categories of personal data with even more care than usual. These are called sensitive or special categories of personal data and different lawful bases apply to them. The table at **Schedule 3** sets out the different purposes for which we process your special category personal data and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

## 6. **Who do we share your personal data with, and why?**

6.1 Sometimes we need to disclose your personal data to other people.

6.2 From time to time, we will ask third parties to carry out certain business functions for us, such as the administration of our payroll and our IT support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to other people, we will make sure that they have appropriate security standards in place to make sure your personal data is protected, and we will enter into a written contract imposing appropriate security standards on them. Examples of these third-party service providers include service providers and/or sub-contractors, such as our outsourced payroll provider, and our IT systems software and maintenance, back up, and server hosting providers.

6.3 In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, in particular:

6.3.1 if we transfer, reorganise, or merge any part of our business or the business of a third party, and we disclose or transfer your personal data to the prospective third party involved in a business transfer, reorganisation, or merger arrangement (and their advisors); and

6.3.2 if we need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, students, or others.

6.4 We have set out below a list of the categories of recipients with whom we are likely to share your personal data:

6.4.1 employment-related benefits providers and other third parties in connection with your benefits (such as pension administrators).

6.4.2 consultants and professional advisors including legal advisors and accountants.

6.4.3 courts, court-appointed persons/entities, receivers, and liquidators.

6.4.4 business partners and joint ventures.

6.4.5 trade associations and professional bodies.

6.4.6 insurers.

6.4.7 the Local Authority.

6.4.8 NHS (for the Purpose of the Test, Track and Trace of COVID-19)

6.4.9 governmental departments, statutory and regulatory bodies including the Department for Education, the Education and Skills Funding Agency, the

Department for Work & Pensions, Information Commissioner's Office, the police and Her Majesty's Revenue and Customs.

- 6.5 We may also share your personal data with third parties, as directed by you.
- 6.6 The DfE collects and processes personal data relating to those employed by Trusts (including Multi Trust Trusts) and local authorities that work in state funded Trusts (including all maintained Trusts, all academies and free Trusts and all special Trusts including Pupil Referral Units and Alternative Provision). All state funded Trusts are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005.
- 6.7 To find out more about the data collection requirements placed on us by the DfE including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.
- 6.8 The DfE may share information about Trust employees with third parties who promote the education or well-being of children or the effective deployment of Trust staff in England by:
- 6.8.1 conducting research or analysis
  - 6.8.2 producing statistics
  - 6.8.3 providing information, advice, or guidance
- 6.9 The DfE 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 DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:
- 6.9.1 who is requesting the data?
  - 6.9.2 the purpose for which it is required
  - 6.9.3 the level and sensitivity of data requested; and
  - 6.9.4 the arrangements in place to securely store and handle the data
- 6.10 To be granted access to Trust workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.
- 6.11 For more information about the DfE's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>
- 6.12 To contact the department: <https://www.gov.uk/contact-dfe>

## 7. **Where in the world is your personal data transferred to?**

- 7.1 If any of our processing activities require your personal data to be transferred outside the European Economic Area, we will only make that transfer if:
- 7.1.1 the country to which the personal data is to be transferred ensures an adequate level of protection for personal data.
  - 7.1.2 we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient.

7.1.3 the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or

7.1.4 you explicitly consent to the transfer.

## 8. **How do we keep your personal data secure?**

We will take specific steps (as required by applicable data protection laws) to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction, or damage. For more information, please read our Data Protection Policy.

## 9. **How long do we keep your personal data for?**

9.1 If you are our employee, we will keep your personal data during the period of your employment and then, after your employment with us ends, for as long as is necessary in connection with both our and your legal rights and obligations. This may mean that we keep some types of personal data for longer than others.

9.2 We will only retain your personal data for a limited period of time. This will depend on a number of factors, including:

9.2.1 any laws or regulations that we are required to follow.

9.2.2 whether we are in a legal or other type of dispute with each other or any third party.

9.2.3 the type of information that we hold about you; and

9.2.4 whether we are asked by you or a regulatory authority to keep your personal data for a valid reason; and

9.2.5 It is a requirement of our insurance cover to prescribe such a retention period.

9.3 Please refer to the Trust's **Records Retention Policy** for further details.

9.4 Any personal data contained in any work-related correspondence or records may be retained for longer, dependant on the retention period of the file that your personal data is held on.

## 10. **What are your rights in relation to your personal data and how can you exercise them?**

10.1 You have certain legal rights, which are briefly summarised at **Schedule 4**, in relation to any personal data about you which we hold.

10.2 Where our processing of your personal data is based on your **consent**, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent, we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent will not impact any of our processing up to that point.

10.3 Where our processing of your personal data is necessary for our **legitimate interests**, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights, and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

10.4 If you wish to exercise any of your rights, please contact Jane Roddy on [info@altusep.com](mailto:info@altusep.com) or 01706 769 800 in the first instance.

10.5 You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), if you are not satisfied with our response to any enquiries or complaint or believe our processing of your personal data does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO) by:

- writing to: Information Commissioner's Officer, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.
- calling: 0303 123 1113; or
- submitting a message through the ICO's website at: <https://ico.org.uk/concerns/>

## 11. **Updates to this notice**

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will update you on material changes to this notice by email. We also encourage you to check this notice on a regular basis.

## 12. **Where can you find out more?**

12.1 We have appointed a Data Protection Officer whose role is to inform and advise us about, and to ensure that we remain compliant with, data protection legislation. The Data Protection Officer should be your first point of contact if you have any queries or concerns about your personal data. Our current Data Protection Officer is Jane Roddy who can be contacted at [info@altusep.com](mailto:info@altusep.com) or [01706 769 800](tel:01706769800).

## SCHEDULE 1

### Categories of personal data

| Type of personal data  | Collected from   |
|--|--|
| <b>a) Contact Information</b>  |  |
| <ul style="list-style-type: none"> <li>Name(s)</li> <li>Address(es)</li> <li>Email address(es)</li> <li>Contact details including mobile telephone number(s)</li> </ul>  | You  |
| <b>b) Personal Information</b>   |  |
| <ul style="list-style-type: none"> <li>Date of birth</li> <li>Gender</li> <li>Next of kin or other dependants</li> <li>Marital or relationship status</li> <li>Lifestyle and social circumstances</li> <li>Emergency contact information</li> </ul>  | You  |
| <b>c) Identity and Background Information</b>  |  |
| <ul style="list-style-type: none"> <li>Details of education and qualifications and results</li> <li>Career history, experience, and skills</li> <li>Passport information</li> <li>Driving licence information</li> <li>Psychometric test results</li> <li>Right to work, residency and/or other visa information (where unrelated to your race or ethnicity)</li> <li>Curriculum Vitae (CV) or resume and professional profile</li> <li>Image or photographs</li> <li>Application form</li> <li>Evaluative notes and decisions from job interviews</li> <li>Preferences relating to job location and salary</li> <li>Conflicts of interests (including where related to family networks)</li> </ul>  | <ul style="list-style-type: none"> <li>You</li> <li>Recruitment consultants and agencies</li> <li>Your previous employers</li> <li>Publicly available information from online resources</li> </ul> |
| <b>d) Financial Information</b>  |  |
| <ul style="list-style-type: none"> <li>Bank account details</li> <li>Salary, compensation, and other remuneration information</li> <li>National insurance number and/or other governmental identification numbers</li> <li>Business expense and reimbursement details</li> </ul>   | <ul style="list-style-type: none"> <li>You</li> <li>Your previous employer</li> </ul>  |
| <b>e) Special Category Personal Data</b>   |  |
| <ul style="list-style-type: none"> <li>Racial or ethnic origin (including your nationality and visa information)</li> <li>Political opinions</li> <li>Religious or philosophical beliefs</li> <li>Trade union membership</li> <li>Biometric data (including fingerprint and retinal scans)</li> <li>Data concerning physical and/or mental health (including occupational health requirements, accident reports, day-to-day health concerns such as diabetes or epilepsy conditions which we should be aware of, dietary requirements, allergies, drug and alcohol test results and reasons for any short term or long-term absence)</li> <li>Sexual orientation</li> <li>Health and safety and accident records and reports</li> <li>Information relating to actual or suspected criminal convictions and offences</li> </ul> | <ul style="list-style-type: none"> <li>You</li> <li>Your emergency contact(s)</li> <li>Your use of Trust security control systems</li> </ul>   |
| <b>f) Employment Administration Information</b>  |  |
| <ul style="list-style-type: none"> <li>Terms and conditions of employment</li> <li>Work related contact details (including location and office and corporate phone numbers)</li> </ul>   | You  |



| Type of personal data   | Collected from   |
|---|--|
| <ul style="list-style-type: none"> <li>• Image/photographs</li> <li>• Holiday and other leave related records</li> <li>• Your working preferences and feedback in relation to the Trust and our staff</li> <li>• Your preferences in relation to our use of your personal data</li> <li>• Hours worked and working time preferences</li> <li>• Statutory and non-statutory leave and absence records</li> <li>• Job termination details</li> </ul>  |  |
| <b>g) Job Performance Information</b> <ul style="list-style-type: none"> <li>• Role responsibilities</li> <li>• Personal development reviews and appraisals, and associated feedback</li> <li>• Training records</li> <li>• Attendance information, including clocking in/out systems or timesheets</li> <li>• Promotion application and/or outcome records</li> <li>• Transfer and secondment information</li> </ul>   | <ul style="list-style-type: none"> <li>• You</li> <li>• Your line manager(s) and co-workers</li> <li>• Training providers</li> <li>• Company to which transferred or seconded</li> </ul> |
| <b>h) Investigation, Grievance and Disciplinary</b> <ul style="list-style-type: none"> <li>• The Trust’s investigations records</li> <li>• Grievance and disciplinary records</li> <li>• Employment tribunal records</li> </ul>   | <ul style="list-style-type: none"> <li>• You</li> <li>• Your line manager(s) and co-workers</li> <li>• Third parties, as permitted by applicable law</li> </ul>                          |
| <b>i) Travel and Expenses Information</b> <ul style="list-style-type: none"> <li>• Transaction records</li> <li>• Visa, passport, and insurance details</li> <li>• Flight and accommodation booking information</li> <li>• Travel itinerary information</li> </ul>  | <ul style="list-style-type: none"> <li>• You</li> <li>• Your use of Trust payment cards</li> </ul>   |
| <b>j) Benefits Information</b> <ul style="list-style-type: none"> <li>• Life assurance and pensions memberships for you and/or your dependants or other beneficiaries</li> <li>• Death benefit information</li> <li>•</li> </ul>  | <ul style="list-style-type: none"> <li>• You</li> <li>• Third party benefits providers</li> <li>• Your dependants or other beneficiaries</li> </ul>                                      |
| <b>k) Asset, Systems and Platform Usage and Communications Information</b> <ul style="list-style-type: none"> <li>• Computer and phone records</li> <li>• Access logs and usage records from document management systems and other Trust provided applications and technologies</li> <li>• User IDs and password information</li> <li>• IP addresses and other online and physical device identifiers</li> <li>• Records of calls, messages and/or internet or other data traffic and communications</li> </ul> | <ul style="list-style-type: none"> <li>• You</li> <li>• Us</li> <li>• Our suppliers</li> <li>• Your use of Trust assets, systems, and platforms</li> </ul>                               |
| <b>l) Security, Location and Access Information</b> <ul style="list-style-type: none"> <li>• Information (including image and biometric data) captured or recorded by electronic card access systems, CCTV, and other security control systems</li> </ul>   | <ul style="list-style-type: none"> <li>• You</li> <li>• Your use of Trust security control systems</li> </ul>  |

## SCHEDULE 2

### Purposes of processing personal data

For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

| Purposes of processing   | Lawful basis<br>We are permitted to process your personal data because...                        |  |   |   |   |   |
|--|--|--|---|---|---|---|
|  | 1. You have given <b>your consent</b> to the processing (Please also see <b>paragraph 10.2</b> ) | 2. It is necessary to perform your employment contract | 3. It is necessary for us to comply with a legal obligation | 4. It is necessary for our legitimate interests or those of third parties | 5. It is necessary to protect your vital interests (or those of someone else) | 6. [It is necessary to perform a task in the public interest or in our official authority |
| <b>a) Recruitment and workforce planning</b>   |  |  |   |   |   |   |
| 1. Administering your application for a job with us and considering your suitability for the relevant role   |  |  |   | ✓   |   |   |
| 2. Obtaining, considering, and verifying your employment references and employment history   |  |  |   | ✓   |   |   |
| 3. Reviewing and confirming your right to work in the UK   |  |  | ✓   |   |   |   |
| 4. Conducting verification and vetting, including criminal background checks and credit checks where required by law ( <b>Note:</b> special category personal data <b>paragraph 5</b> )                              |  |  | ✓   |   |   |   |
| 5. Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role ( <b>Note:</b> special category personal data <b>paragraph 5</b> ) | ✓  |  |   |   |   | ✓   |
| 6. Making a job offer to you and entering into a contract of employment with you   |  | ✓  |   |   |   |   |
| 7. Identifying and assessing the Trust's strategic business direction and resourcing needs, current employees, and areas for development   |  |  |   | ✓   |   |   |
| 8. Promotion and succession planning   |  |  |   | ✓   |   |   |
| 9. Analysing recruitment and retention objectives, processes, and employee turnover rates  |  |  |   | ✓   |   |   |
| 10. Developing, operating, and collecting feedback on recruitment activities and employee selection processes  |  |  |   | ✓   |   |   |

**Lawful basis**

We are permitted to process your personal data because...

| 1. You have given <b>your consent</b> to the processing (Please also see <b>paragraph 10.2)</b> | 2. It is necessary to perform your employment contract | 3. It is necessary for us to comply with a legal obligation | 4. It is necessary for our legitimate interests or those of third parties | 5. It is necessary to protect your vital interests (or those of someone else) | 6. [It is necessary to perform a task in the public interest or in our official authority |
|---|--|---|---|---|---|
|---|--|---|---|---|---|

**Purposes of processing**

**b) General employment management and administration**

|  |   |   |   |   |  |
|--|---|---|---|---|--|
| 11. Communicating with you and providing you with information in connection with your employment or engagement with us from time to time   | ✓ |   | ✓ | ✓ |  |
| 12. Paying your salary, compensation, and any other benefits pursuant to your contract of employment   | ✓ |   |   |   |  |
| 13. Calculating and administering taxation within payroll, and your entitlements to any statutory/contractual benefits (including statutory sick pay and workforce pension arrangements)                                       |   | ✓ |   |   |  |
| 14. Facilitating the administration of any life assurance/insurance, pensions initiatives and plans that we offer in connection with your employment with us ( <b>Note:</b> special category personal data <b>paragraph 5)</b> |   | ✓ | ✓ |   |  |
| 15. General staff administration, including workforce management and facilities operations   |   |   | ✓ |   |  |
| 16. Managing our health and safety compliance obligations  |   | ✓ |   |   |  |
| 17. Paying you discretionary or non-contractual  |   |   | ✓ |   |  |
| 18. Managing annual leave entitlement and records, and to administer related payments  |   |   | ✓ |   |  |
| 19. Managing absence records, contractual sick leave entitlement and administering related payments ( <b>Note:</b> special category personal data <b>paragraph 5)</b>  | ✓ |   | ✓ |   |  |
| 20. Managing maternity, paternity, adoption, parental and dependants leave and (where applicable) pay  |   | ✓ |   |   |  |
| 21. Contacting the appropriate person in the event of an emergency concerning you ( <b>Note:</b> special category personal data <b>paragraph 5)</b>  |   |   |   | ✓ |  |
| 22. Administering any insurance policies ( <b>Note:</b> special category personal data <b>paragraph 5)</b>   |   |   | ✓ |   |  |

**Lawful basis**

We are permitted to process your personal data because...

| 1. You have given <b>your consent</b> to the processing (Please also see <b>paragraph 10.2)</b> | 2. It is necessary to perform your employment contract | 3. It is necessary for us to comply with a legal obligation | 4. It is necessary for our legitimate interests or those of third parties | 5. It is necessary to protect your vital interests (or those of someone else) | 6. [It is necessary to perform a task in the public interest or in our official authority |
|---|--|---|---|---|---|
|---|--|---|---|---|---|

**Purposes of processing**

|  |   |   |   |   |  |   |
|--|---|---|---|---|--|---|
| 23. Determining whether any adjustments are necessary to enable you to carry out your role ( <b>Note</b> : special category personal data <b>paragraph 5)</b>      |   | ✓ | ✓ |   |  |   |
| 24. Preparing risk assessments to prevent future injuries in the workplace   |   |   | ✓ |   |  |   |
| 25. Carrying out performance reviews   |   |   |   | ✓ |  |   |
| 26. Allocating and assigning responsibilities as necessary for workload management purposes, and measuring staff utilisation                                       |   |   |   | ✓ |  |   |
| 27. Administering, recording, and analysing training and training records  |   |   |   | ✓ |  |   |
| 28. Supporting the establishment and maintenance of staff directories  |   |   |   | ✓ |  |   |
| 29. Considering your continuous suitability for your role  |   |   |   | ✓ |  |   |
| 30. Providing details of your employment to a new or potential employer, bank or financial institution where requested by you                                      | ✓ |   |   |   |  |   |
| 31. Handling grievance and disciplinary matters, including investigating issues, considering appropriate resolution, and mitigating actions and reviewing outcomes |   |   |   | ✓ |  |   |
| 32. Responding to reference requests from your future potential employers  |   |   |   | ✓ |  |   |
| <b>c) Security and governance</b>  |   |   |   |   |  |   |
| 33. Monitoring the security of the Trust's physical premises and systems, networks, and applications   |   |   | ✓ | ✓ |  |   |
| 34. Identifying and authenticating employees and other individuals ( <b>Note</b> : special category personal data <b>paragraph 5)</b>                              |   |   |   | ✓ |  |   |
| 35. Establishing a network of emergency contacts for individuals in case of emergency  |   |   |   | ✓ |  |   |
| 36. Identifying, investigating, and mitigating suspected misuse of the Trust's assets,   |   |   | ✓ | ✓ |  | ✓ |

**Lawful basis**  
We are permitted to process your personal data because...

| 1. You have given <b>your consent</b> to the processing (Please also see <b>paragraph 10.2)</b> | 2. It is necessary to perform your employment contract | 3. It is necessary for us to comply with a legal obligation | 4. It is necessary for our legitimate interests or those of third parties | 5. It is necessary to protect your vital interests (or those of someone else) | 6. [It is necessary to perform a task in the public interest or in our official authority |
|---|--|---|---|---|---|
|---|--|---|---|---|---|

**Purposes of processing**

|   |   |  |   |   |   |
|---|---|--|---|---|---|
| systems, and platforms ( <b>Note:</b> special category personal data <b>paragraph 5)</b>  |   |  |   |   |   |
| 37. Ensuring compliance with Trust policies and procedures ( <b>Note:</b> special category personal data <b>paragraph 5)</b>  |   |  |   | ✓ |   |
| <b>d) Legal and regulatory compliance and responsibilities</b>  |   |  |   |   |   |
| 38. Managing and administering our equal opportunities reporting ( <b>Note:</b> special category personal data <b>paragraph 5)</b>  |   |  | ✓ |   |   |
| 39. Compliance with obligations under the contract of employment between you and the Trust  | ✓ |  |   |   |   |
| 40. Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities ( <b>Note:</b> special category personal data <b>paragraph 5)</b>                       |   |  | ✓ |   | ✓ |
| 41. Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities   |   |  |   | ✓ |   |
| 42. Complying with disclosure orders arising in civil proceedings ( <b>Note:</b> special category personal data <b>paragraph 5)</b>   |   |  | ✓ |   | ✓ |
| 43. Investigating, evaluating, demonstrating, monitoring, improving, reporting on, and meeting the Trust's compliance with relevant legal and regulatory requirements ( <b>Note:</b> special category personal data <b>paragraph 5)</b> |   |  | ✓ |   | ✓ |
| 44. Investigating, evaluating, demonstrating, monitoring, improving, reporting on, and meeting the Trust's compliance with best practice and good governance responsibilities   |   |  |   | ✓ |   |
| 45. Responding to employment and industrial relations matters where permitted by applicable law, including criminal investigations, grievances, arbitrations, negotiations, elections   |   |  | ✓ | ✓ | ✓ |

**Lawful basis**

We are permitted to process your personal data because...

| 1. You have given <b>your consent</b> to the processing (Please also see <b>paragraph 10.2)</b> | 2. It is necessary to perform your employment contract | 3. It is necessary for us to comply with a legal obligation | 4. It is necessary for our legitimate interests or those of third parties | 5. It is necessary to protect your vital interests (or those of someone else) | 6. [It is necessary to perform a task in the public interest or in our official authority |
|---|--|---|---|---|---|
|---|--|---|---|---|---|

**Purposes of processing**

and strikes (**Note:** special category personal data **paragraph 5)**

**e) Day-to-day business operations**

- 46. Implementing, adapting, and enhancing systems and processes to develop or improve our business and/or make your job easier or more enjoyable
- 47. Managing, planning, and delivering our global business, sales, and marketing strategies
- 48. <sup>1</sup>Supporting our diversity programmes and staff support networks and initiatives (**Note:** special category personal data **paragraph 5)**
- 49. Publishing external facing materials for marketing and public relations purposes such as where we mention you in the context of the Trust’s projects and initiatives in our marketing materials, social media posts and press releases
- 50. Administering your travel and accommodation arrangements
- 51. Supporting and maintaining our technology infrastructure
- 52. Supporting the sale, transfer or merging of part or all of our business or assets, or in connection with the acquisition of another business

|   |   |   |   |  |  |
|---|---|---|---|--|--|
|   |   |   |   |  |  |
|   |   |   | ✓ |  |  |
|   |   |   | ✓ |  |  |
| ✓ |   |   |   |  |  |
|   |   |   | ✓ |  |  |
|   | ✓ | ✓ | ✓ |  |  |
|   | ✓ |   | ✓ |  |  |
|   |   | ✓ | ✓ |  |  |

## SCHEDULE 3

### Purposes of processing special category personal data

| Purposes of processing  | Special category lawful basis <sup>2</sup><br>We are permitted to process your personal data because... |   |   |  |   |  |
|---|---|---|---|--|---|--|
|   | 1. You have given your explicit consent to the processing   | 2. It is necessary for your/our obligations and rights in the field of employment and social security and social protection law | 3. It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent | 4. It is necessary for our establishment, exercise, or defence of legal claims | 5. It is necessary for reasons of substantial public interest | 6. It is necessary for preventive or occupational medicine, for the assessment of the working capacity of the employee |
| <b>a) Recruitment and workforce planning</b>  |   |   |   |  |   |  |
| 1. Conducting verification and vetting, including criminal background checks and credit checks where required by law                              |   | ✓   |   |  | ✓   |  |
| 2. Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role | ✓   |   |   |  | ✓   |  |
| <b>b) General employment management and administration</b>  |   |   |   |  |   |  |
| 3. Facilitating the administration of any pensions initiatives and plans that we offer in connection with your employment with us                 |   | ✓   |   |  | ✓   |  |
| 4. Managing absence records, contractual sick leave entitlement and administering related payments  |   | ✓   |   |  | ✓   |  |
| 5. Contacting the appropriate person in the event of an emergency concerning you  |   |   | ✓   |  |   |  |
| 6. Administering our insurance policies   |   |   |   |  | ✓   |  |
| 7. Determining whether any adjustments are necessary to enable you to carry out your role   |   | ✓   |   |  |   |  |
| <b>c) Security and governance</b>   |   |   |   |  |   |  |
| 8. Identifying and authenticating employees and other individuals   | ✓   |   |   |  | ✓   |  |
| 9. Identifying, investigating, and mitigating suspected misuse of the Trust's assets, systems, and platforms                                      |   |   |   | ✓  |   |  |
| <b>d) Legal and regulatory compliance and responsibilities</b>  |   |   |   |  |   |  |
| 10. Managing and administering our equal opportunities reporting  |   |   |   |  | ✓   |  |

**Special category lawful basis<sup>2</sup>**

We are permitted to process your personal data because...

**Purposes of processing**

| 1. You have given <b>your explicit consent</b> to the processing | 2. It is necessary for your/our obligations and rights in the field of <b>employment and social security</b> and social protection law | 3. It is necessary to protect the <b>vital interests</b> of the data subject or another person you or they are physically or legally incapable of giving consent | 4. It is necessary for our establishment, exercise, or defence of <b>legal claims</b> | 5. It is necessary for reasons of <b>substantial public interest</b> | 6. It is necessary for <b>preventive or occupational medicine</b> , for the assessment of the working capacity of the employee |
|--|--|--|---|--|--|
|--|--|--|---|--|--|

|   |   |   |   |  |  |   |
|---|---|---|---|--|--|---|
| 11. Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities or sharing information (on a voluntary basis) with the same |   |   | ✓ |  |  |   |
| 12. Complying with disclosure orders arising in civil proceedings   |   |   | ✓ |  |  |   |
| 13. Investigating, evaluating, demonstrating, monitoring, improving, and reporting on the Trust's compliance with relevant legal and regulatory requirements  |   |   | ✓ |  |  |   |
| 14. Responding to employment and industrial relations matters where permitted by applicable law, including criminal investigations, grievances, arbitrations, negotiations, elections and strikes           |   |   | ✓ |  |  |   |
| 15. Making reasonable adjustments as needed to help remove barriers faced by you in your role because of any disability you might have  |   | ✓ |   |  |  |   |
| 16. Delivering occupational health advice and services to you in relation to your role with us  |   |   |   |  |  | ✓ |
| <b>e) Day-to-day business operations</b>  |   |   |   |  |  |   |
| 17. Supporting our diversity programmes and staff support networks and initiatives  | ✓ |   |   |  |  |   |



## SCHEDULE 4

### Your rights in relation to personal data

| Your right  | What does it mean?   | Limitations and conditions of your right   |
|---|--|--|
| <b>Right of access</b>  | Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a "data subject access request").  | If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations.<br>We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, e.g., privacy and confidentiality rights of other staff.  |
| <b>Right to data portability</b>                                    | Subject to certain conditions, you are entitled to receive the personal data which you have provided to us, and which is processed by us by automated means, in a structured, commonly used machine readable format.   | If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations.<br>This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (i.e., not for paper records). It covers only the personal data that has been provided to us by you. |
| <b>Rights in relation to inaccurate personal or incomplete data</b> | You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date.<br>We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number, immigration status. | Please always check first whether there are any available self-help tools to correct the personal data we process about you.<br>This right only applies to your own personal data. When exercising this right, please be as specific as possible.  |
| <b>Right to object to or restrict our data processing</b>           | Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.   | As stated above, this right applies where our processing of your personal data is necessary for our legitimate interests. You can also object to our processing of your personal data for direct marketing purposes.   |
| <b>Right to erasure</b>   | Subject to certain conditions, you are entitled to have your personal data erased (also known as the " <i>right to be forgotten</i> "), e.g. where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.   | We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims.  |
| <b>Right to withdrawal of consent</b>                               | As stated above, where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.  | If you withdraw your consent, this will only take effect for future processing.  |