ACHIEVING TOGETHER

FOUR STONES GATEWAY TRUST

PRIVACY NOTICE FOR STAFF

DATE POLICY WAS APPROVED	30.04.2025
DATE POLICY WILL BE REVIEWED	SPRING 2027
MEMBER OF STAFF WITH RESPONSIBILTY FOR REVIEW	Head of IT Services

FOUR STONES GATEWAY TRUST
Love Lane, Cleobury Mortimer, Shropshire, DY14 8PE · 01562 826580
office@fourstonesgateway.org.uk · www.fourstonesgateway.org.uk
Four Stones Gateway Trust is a company limited by guarantee registration number 9115941

Key Definitions

All policies incorporate the following schools or organisations within Four Stones Gateway Trust ('the Trust'):

- Clee Hill Community Academy
- Cleobury Mortimer Primary School
- Haybridge High School and Sixth Form
- Haybridge Teaching School Hub
- Haybridge SCITT
- King Charles I School
- Lacon Childe School
- SHaW (Shropshire, Herefordshire, and Wolverhampton) Maths Hub
- Stottesdon CofE Primary School
- TDMS (The De Montfort School)
- Any other schools or organisations that may join the Trust from time to time and not listed above.

The terms Academy, School, Organisation and Trust are considered interchangeable in the context of all Trust policies.

Where appropriate, in this policy the term:

"CEO" includes the Chief Executive Officer

"CFOO" includes the Chief Financial Officer

"Trust Senior Leadership Team" includes Executive Headteachers, Headteachers, strategic operational leads and Teaching School/SCITT Directors.

"Headteacher" includes the appropriate School Headteacher.

"Trustees or Trust Board" are appointed Trustees who oversee the business of Four Stones Gateway Trust, agreeing the overarching strategic direction and ensuring robust governance.

"Local Academy Boards (LAB)" are appointed Governors at a local level associated with the Trust's Worcestershire Schools. LAB Governors act as advocates for their school's Safeguarding, SEND, Standards and Stakeholder engagement.

"Local Governing Bodies (LGB)" are appointed Governors at a local level associated with the Trust's Shropshire Schools. LGB Governors are advocates for their school's Safeguarding, SEND, Standards and Stakeholder engagement.

"Chair" responsible for leading the board and ensuring its effectiveness.

"Stakeholders" are any individuals or companies who are invested in the welfare and success of the Trust and/or School and its students, including staff members, students, parents, community members, LAB, LGB or Trust members, trade unions, local business leaders etc.

Purpose of this Privacy Notice

The Data Protection Act 2018 provides individuals with the right to be informed about how their information is used by organisations.

This Privacy Notice explains how Four Stones Gateway Trust (the Trust) uses information about employees, temporary staff, and volunteers. If you can be identified from the information we hold, then this is known as your "personal data."

This Privacy Notice explains:

- why we use your personal data.
- the reasons we need to do this.
- what kinds of personal data we use
- where we collect your personal data from
- who we will share your personal data with
- Your information rights
- who to contact if you need more information or have a concern.

Four Stones Gateway Trust is the 'data controller' for the purposes of data protection law.
The Trust is registered with the Information Commissioners Office: ZA521971

The personal data we hold.

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

- Contact details.
- Date of birth, marital status, and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, 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, identification evidence, 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
- Absence data including medical information you provide.
- Images captured as photographs, videos, or in CCTV footage.
- Data about your use of the school's information and communications systems

We may also collect, store, and use information about you that falls into "special categories" of more sensitive personal data. This may include information about (where applicable):

- Race, gender identity, ethnicity, religion, and sexual orientation.
- Health, including any disability or medical condition that we need to be aware of, and sickness records.

We may also collect, use, store, and share (where required) 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.

Why we use this data.

The purpose of processing this data is to help us run our Trust and schools, including to:

- Enable you to be paid.
- Facilitate safe recruitment, as part of our safeguarding obligations towards our students
- Uphold our other statutory responsibilities in relation to safeguarding.
- Support an effective appraisal process.

- Inform our recruitment and retention policies.
- Allow better financial modelling and planning.
- Enable ethnicity, disability, and equality monitoring.
- Enable the development of a comprehensive picture of the workforce and how it is deployed.
- Support the work of the School Teachers' Review Body
- Safeguard staff from potentially harmful and inappropriate online material.
- Provide statutory returns to the Department for Education (School Workforce Census)

Our lawful basis for using this data.

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered with you (your contract of employment)
- Comply with a legal obligation (as your employer, or in undertaking statutory duties such as safeguarding)
- Conduct a task in the public interest (the delivery of teaching and learning)

Less commonly, we may also use personal information about you were:

- You have given us consent to use it in a certain way.
- We need to protect your vital interests (or someone else's interests)
- We have legitimate interests in processing the data.

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 requesting your consent and explain how you go about withdrawing consent if 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.

Our basis for using special category data.

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

Collecting this Information

While most information we collect from you is mandatory, there may be some information that you can choose whether or not to provide to us.

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.

How we retain and store this data

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

All information is retained in accordance with the retention guidelines detailed in our Trust Records Management Policy and Retention Schedule. Retention periods vary depending on the information. The retention periods are as follows:

- staff personal file: this is retained for 6 years from the termination of employment.
- annual appraisal records: these are retained for a further 5 years after completion.
- oral and level 1 written warning: these are usually retained for between 6 to 12 months following the date of issue.
- level 2 written warning: these are usually retained for 12 months from the date of issue.
- final warning: these are usually retained for 18 months to 3 years from the date of issue.
- accident/injury at work records: these are retained for 12 years from the date of the incident.

The above time periods are for guidance purposes only and retention periods for both oral and written warning are at the head teacher's discretion.

Your information is stored securely and at the end of the retention period is disposed of in a secure way. Our methods of disposal are in accordance with government guidance and are conducted in a way that ensures that reconstruction is highly unlikely.

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

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.

Use of your personal data for marketing purposes

Where you have given, us consent to do so, we may send you marketing information by email or text promoting Trust and school events, campaigns, charitable causes, or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

We may also you your image in newsletters, posts, and other communications relating to Trust and school activities, which may be published on our websites and social media channels.

Use of your personal data in automated decision making and profiling

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 to explain the processing to you, including your right to object to it.

Data Sharing

We do not share information about you with any third party without your 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:

- Local Authority – Shropshire or Worcestershire – to meet our legal obligations to share certain information with it, such as safeguarding concerns, staff pension processing.
- The Department for Education – for staff workforce census and other statutory data requests
- Other Schools within the Trust
- Your family or contacts – in the event of an emergency
- Educators and examining bodies – only to coordinate arrangements for the smooth and effective running of examinations and non-examination assessment.
- Ofsted – to comply with statutory requests and during the process of an inspection.
- The providers of our management information and safeguarding systems
- The providers of systems we use for the delivery of teaching and learning.
- The providers of systems we use to actively filter and monitor online activities.
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll and HR support.
- Survey and research organisations.
- Financial organisations – this may be organisations such as our HR/Payroll Provider, Student Loan Company, or Child Maintenance Payment
- Central and local government – Teachers' Pension Scheme or West Midlands Pension Scheme
- Our auditors – to ensure we fulfil our statutory obligations in terms of employing staff.
- Trade unions and associations – where they have been appointed to represent you.
- Health authorities/Health and social welfare organisations – staff health and wellbeing
- Professional advisers and consultants – such as Occupational Health and Counselling Services
- Police forces, courts, tribunals – to comply with any requests to facilitate legal processes.
- Professional bodies – who may require information and support with elements of a legal process.
- Employment and recruitment agencies – to comply with requests for references and information from potential employers and/or agencies.
- Public Health England – to support statutory activities in the interests of public health.

Local Authorities

We are required to share information about our workforce members with our Local Authority (LA) - Worcestershire or Shropshire - under Section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

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 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 Trust 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) 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:

- who is requesting the data;
- the purpose for which it is required;
- the level and sensitivity of data requested; and
- the arrangements in place to securely store and handle the data.

To be granted access to school 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.

How to find out what personal information the Department for Education (DfE) hold about you.

Under the terms of the Data Protection Act 2018, you're 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

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

Transferring data internationally

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

Your Information Rights

Data Protection law provides you with certain rights.

Requesting access to your personal data

You (or an authorised official representative) have the right to request access to information about you that we hold. If we do hold information about you, we will:

- Give you a description of it.
- Tell you why we are holding and using 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
- Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
- Give you a copy of the information.

To make a request to access your personal information, please contact our Data Protection Officer by emailing DPO@fourstonesgateway.org.uk or in writing to: Four Stones Gateway Trust, Love Lane, Cleobury Mortimer, Shropshire, DY14 8PE.

When making a request you should confirm:

- The types of records you wish to access.
- any date periods these relate to

Please address letters: For the attention of the Data Protection Officer.

We may require you to provide proof of your identity before we can comply with your request.

Your Other Information Rights:

- **The right to know how your information is being used** – We uphold this by publishing Privacy Notices and letting you know how your information will be used when we collect it.
- **The right to have inaccurate information amended** - We uphold this right by asking you to review the information we hold on record and updating information if you provide evidence to show it has changed.
- **The right to have information removed or deleted from your records** – We uphold this right by removing or deleting your information that we are no longer required to keep.
- **The right to temporarily restrict how your information is used** - We uphold this right by not using information until we have confirmed what is accurate, unless it is necessary to do so.
- **The right to object to us using your data for certain purposes** – We uphold this by asking for your consent or permission to use your information for these purposes (including direct marketing and for scientific/historical research and statistics)
- **The right for important decisions about you not to be made solely by automated systems that use your information (like computer algorithms and AI**) – We uphold this right by letting you know if these systems are used and giving you a choice for these types of decisions to be reviewed.

Who to Contact

The Trust has a Data Protection Officer (provided by Services 4 Schools Ltd). Their role is to oversee and monitor our data protection procedures, and to make sure we are compliant with data protection legislation.

The Data Protection Officer is responsible for helping employees and other individuals uphold their information rights.

You can contact our Data Protection Officer by emailing: DPO@fourstonesgateway.org.uk
or in writing to: Four Stones Gateway Trust, Love Lane, Cleobury Mortimer, Shropshire, DY14 8PE.

Please address letters: For the attention of the Data Protection Officer.

Complaints or Concerns

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with our Data Protection Officer in the first instance. You can also raise a concern with the Information Commissioner's Office at https://ico.org.uk/concerns/

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.