Brunel Academies Trust
Workforce Privacy Notice

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About this Privacy Notice

Brunel Academies Trust collects and processes personal data to manage the employment relationship. We are committed to being transparent about how we collect and use data, and to meeting our data protection obligations.

Brunel Academies Trust is registered with the Information Commissioner's Office (ICO) for the purpose of processing personal data.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the Data Protection Act 2018 (DPA), and the UK General Data Protection Regulation (GDPR).

It applies to all employees, workers Trustees, Governors, volunteers, those undertaking work experience, contractors and others carrying out work on behalf of Brunel Education.

Brunel Academies Trust is a "Data Controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time but if we do so, we will make available to you an updated copy of this notice as soon as reasonably practicable. The notice will be available on Brunel Academies Trust website, or you can request a copy from your manager.

It is important that you read and understand this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as is necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are certain types of special category (sensitive) personal data which require a higher level of protection, such as information about a person's health or sexual orientation.

Information about criminal convictions also warrants this higher level of protection.

We will collect, store, and use the following categories of personal information about you:

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- Personal contact details such as name, title, addresses, telephone numbers, and email addresses
- Date of birth
- Gender
- Marital status and dependants
- Next of kin and emergency contact information
- National Insurance number
- Bank account details, payroll records and tax status information
- Salary, leave and absence, pension, and benefits information
- Start date and, if different, the date of your continuous employment
- The terms and conditions of your employment
- Leaving date and your reason for leaving
- Location of employment/workplace
- Copy of driving licence and vehicle information
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)
- Employment records (including job titles, work history, working hours, holidays, training records)
- Qualifications, education, skills, experience, and professional memberships
- Performance information
- Disciplinary and grievance information
- CCTV footage and other information obtained through electronic means such as swipe card records
- Information about your use of our information and communications systems, including e- mail
- Photographs
- Results of HMRC employment status check, details of your interest in, and connection with, any intermediary through which your services are supplied
- We may use an online platform to live stream meetings; you will be aware of this and we will advise you if they are recorded (which is unlikely)

We may also collect, store, and use the following more sensitive types of personal information:

- Equal opportunities monitoring information including information about your race or ethnicity, nationality, religion or beliefs, gender reassignment and sexual orientation
- Trade union membership
- Information about your health, including any medical condition/disability, health, and sickness records, including whether you have a disability for which we need to make reasonable adjustments
- details of any absences (other than holidays) from work including time on dependants leave, maternity/adoption/paternity leave, disability leave, sick leave
- where you leave employment and the reason for leaving is related to your health, information about that

condition and the decision taken that are needed for pensions or insurance purposes

- Information about criminal convictions and offences

How is your personal information collected?

We collect personal information about employees and workers through the application and recruitment process, either directly from applicants or sometimes from an employment agency or background check provider.

In some cases, we collect personal data from third parties including former employers and other background check agencies i.e. Disclosure and Barring Service (DBS).

We will collect additional personal information during job-related activities throughout the period of you working for us.

Data is stored in a range of different places, including your personnel file, in the HR management systems and in other IT systems including the organisation's email system.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances, where:

- We wish to enter a contract with you and to meet our obligations under your employment contract. For example, to process your data to provide you with an employment contract, to pay you in accordance with your contract and to administer pension and benefit entitlements.
- We need to comply with a legal obligation. For example, we collect and use workforce information under legal and statutory obligations within the Keeping Children Safe in Education (KCSIE) statutory guidelines. We are required to check employees' suitability to work with children, your entitlement to work in the UK, to deduct tax, to comply with health and safety laws, and to enable you to take periods of leave to which you are entitled.
- Our intention is to protect your vital interests.
- You have given us consent to use it in a certain way (for example a photo of you for promotional purposes or on our website).

Where we are processing sensitive personal data, we rely on additional conditions to ensure this is carried out in a lawful manner.

- Where it is necessary to carry out our obligations under employment law (generally the Employment Rights Act 1996, ACAS Codes of Practice, and the Equality Act 2010).
- Where we are carrying out our obligations in the provision of an Occupational Health Service and/or for the assessment of your working capacity.
- For reasons of equality monitoring, which we carry out in the substantial public interest. This condition is met if the processing is necessary for the purpose of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained.

During the recruitment process, we will ask you to declare any unspent criminal convictions, and when working with children or vulnerable adults, we are required by law (Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012) to carry out a Disclosure and Barring Service check. We rely on our common law duty of care to ensure we are recruiting the best person for the job, in accordance with Article 10 of GDPR,

to process this data.

Situations in which we will use your personal information

The situations in which we will process your personal information are listed below:

- Deciding about your recruitment or appointment
- Determining the terms on which you work for us
- Checking you are legally entitled to work in the UK
- Paying you and, if you are an employee or deemed employee for tax purposes, deducting tax and National Insurance contributions (NICs)
- Making the necessary deductions from wages, such as for the childcare benefit scheme, cycle to work scheme, student loans, attachment to earnings orders etc
- Providing benefits to you
- Enrolling you in a pension arrangement in accordance with our statutory automatic enrolment duties
- Liaising with the trustees or managers of a pension arrangement operated by a pension provider and any other provider of employee benefits
- Administering the contract we have entered into with you
- Business management and planning, including accounting and auditing
- Conducting appraisals, managing performance, and determining performance requirement
- Keeping in touch with you and communications
- Making decisions about salary reviews
- Assessing qualifications for a particular job or task
- Gathering evidence for possible grievance or disciplinary hearings
- Making decisions about your continued employment or engagement
- Making arrangements for the termination of our working relationship
- Training and development requirements
- Dealing with legal disputes involving you, or other employees, workers, and contractors, including accidents at work
- Ascertaining your fitness to work
- Managing sickness absence
- Complying with health and safety obligations
- To prevent fraud
- To monitor your use of our information and communication systems to ensure compliance with our IT and information security policies
- To ensure network and information security, including preventing unauthorised access to computer and electronic communications systems and preventing malicious software distribution
- To conduct data analytics studies to review and better understand employee retention and turnover rates

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- Equal opportunities monitoring
- Staff surveys
- "Who's Who" information boards / webpage

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information
If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

You may also have to provide us with data 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.

Change of purpose
We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive information
Special categories of particularly sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation, or trade union membership, require higher levels of protection. We need to have further justification for collecting, storing, and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations or exercise rights in connection with employment.
3. Where it is needed in the public interest, such as for equal opportunities monitoring, or in relation to our occupational pension scheme.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

To support the general wellbeing at work, we will occasionally contact specific groups of individuals, such as those declared as disabled, or in a particular age bracket, to set up working groups.

Situations in which we will use your sensitive personal information
In general, we will not process particularly sensitive personal information about you unless it is necessary for performing or exercising obligations or rights in connection with your employment. On rare occasions, there may be other reasons for processing, such as it is in the public interest to do so. The situations in which we will process your particularly sensitive personal information are listed below.

- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including statutory maternity pay, statutory sick pay and pensions. We need to process this information to exercise rights and perform obligations in connection with your employment.
- If you are eligible for an ill-health pension under a pension arrangement operated by a group company, we will use information about your physical or mental health in reaching a decision about your entitlement.
- We will use information about your race or national or ethnic origin, religion, gender, or your sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided, we do so in line with our Data Protection Policy.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process, or we may be notified of such information directly by you during your employment. We will hold information about criminal convictions and use information about these and offences to determine your suitability to carry out a particular role on an ongoing basis.

Automated decision making

We do not use any means of automated decision-making or profiling.

Data sharing

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you, or where we have another legitimate interest in doing so.

Who might my information be shared with?

We may share your personal information to obtain pre-employment references from other employers and employment background checks from third-party providers including necessary criminal record checks from the Disclosure and Barring Service. We will make you aware of these requests at the relevant time to ensure we have consent from you to obtain the information required.

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If requested, we may also share data to a prospective employer, in response to a reference request about you. However, this would only occur if we were satisfied that you have been made aware that this request has been made.

Where it is legally required or is otherwise necessary (and it complies with data protection law) personal information may be shared with the relevant local authority – to meet our legal obligations to share certain information such as safeguarding concerns or with the Department for Education (DfE). The DfE processes personal data relating to those employed by schools (including all academies and free schools and all special schools including pupil referral units). To find out more about the data collection requirements that are placed upon 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

If you choose to remain in a pension scheme, we will share your employment and pay details with your pension provider. We will also share data relating to your working practices and sickness absence with our occupational health provider (currently Safewell) in the event of an occupational health referral.

We may share your personal information with other third parties, for example in the context of the retendering or outsourcing services. In this situation we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction and the relevant legislation.

We may also need to share your personal information with a regulator, which could include an Employment Tribunal, the Pensions Regulator, the Pensions Ombudsman, our insurers, legal representatives, or to otherwise comply with the law. This may include making returns to HMRC and disclosures to the public such as senior officer remuneration reporting requirements.

We may be obliged, for the purposes of prevention or detection of crime, to share information with the police or other agencies with official authority.

We may also share data with our internal and external auditors, as is our legal requirement under the Local Government Act.

Data may occasionally be shared with our Data Protection Officer, for example in relation to a Subject Access Request.

Under the Freedom of Information Act 2000, we are occasionally asked to disclose documents which may contain your name. As an employee of Brunel Academies Trust the Information Commissioner considers that you have a lesser degree of expectation to privacy when carrying out your work for us, and therefore these documents may be released in an unredacted format. We do make a distinction between junior and senior officers, and those already in public facing roles, when deciding whether to release a name.

It is important to remember that when acting for Brunel Academies Trust the contact details you choose to use may not be considered personal data. We therefore always suggest that you use your work-issued email and/or phones for work correspondence.

Which third-party service providers process my personal information?

The following activities are carried out by third-party service providers, on our behalf:

- Payroll (currently SAM People)
- Pension administration (further details below)
- Benefits provision and administration
- Recruitment (currently SAM People Recruitment)
- Employee Assistance Programme (currently Carefirst)

- We will share personal data regarding your participation in any pension arrangement in connection with the administration of the arrangements.

How secure is my information?

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

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions and have written agreements in place with them to govern the security of data.

Pensions

Our pension providers are the data controller for the information they process for the management and administration of the pension service. As such, they will have their own privacy notice for how they process your personal data, and they should be contacted directly if you have any queries or concerns over the handling of your data.

- https://www.wiltshirepensionfund.org.uk/
- https://www.teacherspensions.co.uk/
- https://www.nestpensions.org.uk/schemeweb/nest.html

Transferring information outside the EU

No data is transferred or processed outside of the UK. The only occasion we may send personal data abroad would be in response to an enquiry or application from someone living abroad. In this instance, secure email would be used.

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available from Brunel Academies Trust Website To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Generally, employee records are retained in accordance with employment law, which requires us to keep records for six years following termination of employment.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker, or contractor of the company we will retain and securely destroy your personal information in accordance with our data retention policy **OR** applicable laws and regulations.

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Rights of access, correction, erasure, and restriction

Your duty to inform us of changes
It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information
You have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request the restriction** to destruction of your records in the event you need them, and they are nearing the end of their retention period.
- **Request the transfer** of your personal information to another party.

If you want to review, request the restriction to destruction of your personal data, or request that we transfer a copy of your personal information to another party, please contact i-west@bathnes.gov.uk.

References received from third-party organisations are considered to have been provided in confidence. Any requests for access to confidential references will be considered in accordance with the wishes of the third-party organisation.
If you wish to make a change to the data we hold about you, please contact i-west@bathnes.gov.uk.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if you wish to receive more than one copy of your record.

What we may need from you
We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent
In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact your People Services Advisor. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data Protection Officer
We have appointed a Data Protection Officer (DPO) to oversee our compliance with data protection legislation. If you have any questions about this Privacy Notice or how we handle your personal information, please contact the DPO:

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- One West
- i-west@bathnes.gov.uk
- 01225 395959

You have the right to make a complaint to us about the way in which we process your personal data. There is also a right to make a complaint to the Information Commissioner but you should raise your complaint with us first by contacting i-west@bathnes.gov.uk. We will acknowledge your complaint within 30 days and respond without undue delay.

The Information Commissioner may be contacted at:

- Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
- www.ico.org.uk
- 0303 123 1113

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will publish 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.

This version was last updated in Sept 2025

Version	Date	Summary of changes	Author
V1.0	July 2020	Initial version	One West
V2.0	Aug 2023	Full review. Addition of Pensions information, and confirmation of confidentiality of references.	One West
V2.1	Oct 2023	Formatting changes	One West
V2.2	Aug 2025	Addition of consideration of providing references, and highlighted AI tools may need to be considered within Automated Decision Making. Addition of right to make a complaint to the organisation.	One West

If you have any questions about this privacy notice, please contact i-west@bathnes.gov.uk.