Privacy Notice
Workforce
(how we use workforce information)
v3.0

Under data protection law, individuals have a right to be informed about how the Trust and its schools use any personal data that is held about them. We, the Tenax Schools Trust, comply with this right by providing Privacy Notices to individuals where we are processing their personal data.

The Trust aims to ensure that all personal data is collected, stored and processed in accordance with the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and other relevant legislation. The Tenax Schools Trust is the Data Controller for the purpose of the data protection law and is registered with the Information Commissioner's Office (ICO), the UK's regulatory body.

The categories of school workforce information that we collect, process, hold and share include:

- **Personal identifiers**, including name, contact details, employee or teacher number, national insurance number, bank account details)
- **Characteristics,** such as ethnicity, language, nationality, country of birth, age, gender,
- **Employment contract information,** such as start dates, hours worked, post, roles and salary information
- **Payroll information**, such as tax code, timesheets, expenses claim details, occupational and statutory sick pay, other statutory and non-statutory payments, membership of pension schemes
- **Work absence information** such as number of absences and reasons
- **Medical information** such as fitness for employment, allergies, details of disabilities, workplace risk assessments, workplace accident records
- **Qualifications** (and, where relevant, subjects taught)
- **Recruitment information**, including copies of Right to Work information, references and other pre-employment checks, and other application details including work history, job titles, references, and interview records
- **Performance management information**, including appraisals and training records
- **Employment records**, including disciplinary and grievance records
- **Information captured via electronic monitoring** of Trust's devices and systems as part of our safeguarding measures in place
- **Other** including photographs, CCTV images (where installed) captured in school, biometric data (in certain schools), information about business and pecuniary interests

Why we collect and use this information

The purpose of processing this data is to:

- Enable the development of a comprehensive picture of the workforce and how it is deployed
- Inform the development of recruitment and retention policies
- Facilitate financial modelling and planning, and financial auditing
- Enable sickness monitoring and fulfil the Trust's duty of care towards employees
- Enable effective performance management and identify training needs
- Enable individuals to be paid, and all contractual entitlements to be fulfilled
- Fulfill statutory obligations under legislation including: the Equality Act 2010, Keeping Children Safe

in Education (KCSIE), Safeguarding Vulnerable Groups Act 2006, Health and Safety at Work Act 1974 and associated regulations, Equality Act (Gender Pay Gap Information) Regulations 2017, Education (Health Standards) (England) Regulations 2003, Immigration, Asylum and Nationality Act 2006, Immigration Act 1971, Education and Skills Act 2008

The lawful basis on which we process this information

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

- Processing the data is necessary for the performance of a contract with an individual, or to take steps before they enter into a contract (e.g. during the recruitment process)
- The processing of the data is necessary for the Trust to comply with the law
- The processing is necessary for the performance of a task in the public interest, or to perform the Trust's official functions
- The processing of data is necessary for our legitimate interests, such as monitoring the effectiveness of our employment policies and procedures.

Where the Trust also processes special category (sensitive) data, the Trust processes this where:

- Processing the data is necessary to carry out the obligations of the Trust in relation to employment law
- There is a substantial public interest, for example to ensure and promote equality of opportunity and treatment
- Processing the data is necessary for the purposes of preventative or occupational medicine for the assessment of the working capacity of the employee

The Trust may also process data for the establishment, exercise or defence of legal claims.

Some of the reasons listed above for collecting and using personal data overlap and there may be several grounds which justify our use of this data.

Collecting this information

While the majority of the information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us. If there is processing or sharing that relies on consent, we will make this clear to you. Where you have a choice, you may withdraw your consent at any time.

Storing this information

We hold workforce data securely for the set amount of time shown in our record retention schedule. For more information on our record retention schedule and how we keep your data safe please refer to our Data Protection Policy and our Records Management Policy which are available on the Tenax Schools Trust website tenaxschoolstrust.co.uk/our-policies

Securing this information

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

Sharing this information

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 for another reason allowed under data protection law, we may share personal information about you with:

- **The Department for Education (DfE)** and other government agencies or regulatory bodies to meet our legal obligations as part of data collections
- **The Local Authority** – to meet our legal obligations to share certain information with it
- **Suppliers and service providers** – to enable them to provide the service we have contracted them for

We may also share personal information with law enforcement or other authorities where required by law, for the prevention and detection of crime, or required to safeguard children, young people or other vulnerable groups.

We are required to share information about our workforce members with the Local Authority and the Department for Education under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Your rights

Under the GDPR you have rights which you can exercise free of charge which allow you to:

- Know what we are doing with your information and why we are doing it
- Ask to see what information we hold about you (Subject Access Request)
- Ask us to change any information we hold about you that you think is not accurate or complete
- Object to direct marketing
- Withdraw consent for processing or retaining data (where relevant)

Depending on our reason for processing or retaining your data, you may also be entitled to:

- Ask us to delete information we hold about you
- Have your information transferred electronically to yourself or to another organisation
- Object to decisions that significantly affect you being made by automated means
- Object to how we are using your information
- Stop us using your information in certain ways

We will always seek to comply with your request however we may be required to hold or use your information to comply with legal duties. Please note, your request may delay or prevent us delivering a service to you.

If you would like to exercise a right, please contact the Data Protection Officer.

Contact details

If you have any questions or any concern about our data processing, please raise this with our Data Protection Officer in the first instance.

You can contact the Data Protection officer via email at DPO@tenaxschoolstrust.co.uk or write to Data Protection Officer, Tenax Schools Trust c/o Bennett Memorial Diocesan School, Culverden Down, Tunbridge Wells, TN4 9SH.

If you feel we have not used your information in the right way you have the right to complain to the Information Commissioner's Office at https://ico.org.uk/concerns/ or by telephone on 0303 1231113

Changes to this notice

We may need to update this privacy notice periodically. Any modification or amendment to this privacy notice will be applied to you and your data as of that revision date. This version was last updated 1st September 2026.