



Coastal Learning
PARTNERSHIP

PRIVACY NOTICE For Employees

Responsibility:	Partnership Board
Document owner:	Data Protection Officer
Approved date:	
Review period:	2 years or as necessary
Amendments:	March 2025 - recording and storage of telephone calls

The Coastal Learning Partnership is committed to protecting and respecting your privacy. This privacy notice explains what personal information we collect about you, how and why we process (collect, store, use and share) your personal information, your rights in relation to your personal information and how to contact us or make a complaint.

When we process your personal information, we are regulated under European and national data protection laws and we are responsible as 'controller' of that personal information for the purposes of those laws.

Your personal information is information relating to you as an individual. It does not include information relating to organisations.

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1 The personal information we collect and use

1.1 We may collect and use the following information during your employment:

- 1.1.1** Personal information, such as your name, contact details (address, home and mobile phone numbers, email address) and emergency contacts (name, relationship and home and mobile phone numbers);
- 1.1.2** Characteristics information, such as gender, age, ethnic group, sex, religion and marital status
- 1.1.3** Information collected during the recruitment process that we retain during your employment, including your curriculum vitae, qualifications, employment and education history (and, where relevant, subjects taught) and references;
- 1.1.4** Employment contract information, such as start date, hours worked, and role;
- 1.1.5** Details of salary and benefits (including expenses), bank/building society, National Insurance and tax information;
- 1.1.6** Payroll records and payslips;
- 1.1.7** Details of your spouse/partner and any dependants;
- 1.1.8** Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information, including right to work in the UK (including sensitive information about your ethnic and racial origin);
- 1.1.9** Details of your pension arrangements, and all information included in these and necessary to implement and administer them;
- 1.1.10** Work absence records, including information in your sickness and absence records (including sensitive personal information regarding your physical and/or mental health);
- 1.1.11** Information about accidents and incidents (including sensitive personal information regarding your physical health);
- 1.1.12** Information contained in health reports (including sensitive personal information regarding your physical and mental health);
- 1.1.13** Criminal records information, including the results of Disclosure and Barring Service (DBS) checks and section 128 checks (as required);
- 1.1.14** Information on grievances raised by or involving you;
- 1.1.15** Information on conduct and/or other disciplinary issues involving you;
- 1.1.16** Details of your training records, appraisals and performance reviews;
- 1.1.17** Details of your performance management/improvement plans (if any);
- 1.1.18** Details of your time and attendance records;
- 1.1.19** Details of annual leave or family friendly leave (including sensitive personal information regarding your sex and sexual orientation and physical health);
- 1.1.20** Information regarding your work output and/or performance;

- 1.1.21 Information about your use of our IT, communication and other systems, and other monitoring information;
- 1.1.22 Your image, in photographic and video form, for example in CCTV images;
- 1.1.23 We record telephone calls, incoming and outgoing, for training and monitoring purposes;
- 1.1.24 Details of your use of business-related social media, such as LinkedIn;
- 1.1.25 Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur); redundancy information; and
- 1.1.26 Details in references about you that we give to others.

- 1.2 The extent to which we process the categories of information detailed above may differ depending on your job role or if you are a casual worker, an agency worker, independent contractor, consultant, work experience student, SCITT trainee or apprentice.

2 How we collect this information

- 2.1 We may collect this information from you (for example, via application forms), your personnel records, employment agencies, the Home Office, HMRC, pension administrators, our payroll providers, the Department for Education, your doctors, from medical and occupational health professionals we engage and from our insurance benefit administrators, the DBS, other employees, consultants and other professionals we may engage, e.g. to advise us generally and/or in relation to any grievance, conduct appraisal or performance review procedure, publicly available sources, automated monitoring of our websites and other technical systems, such as our computer networks and connections, software (including payroll software) and other school systems, communications systems, remote access systems, email and instant messaging systems, intranet and Internet facilities, telephones, voicemail, mobile phone records.
- 2.2 Workforce information is essential for the Partnership's operational use. Whilst the majority of the personal information you provide to us is mandatory, some may be requested on a voluntary basis. We will inform you at the point of collection, whether you are required to provide us with the information requested.

3 How we use your personal information

- 3.1 We use your personal information to allow us to enter into and carry out your contract, to comply with our legal obligations in relation to your employment, to carry out our business and to carry out our public task of providing education.
- 3.2 Without this information, we cannot enter into or perform our obligations under your contract of employment (such as paying you or providing a benefit to you) and we may be prevented from complying with our legal obligations (such as ensuring the health and safety of our workers) or from providing education.
- 3.3 Further information on the monitoring we undertake in the workplace and how we do this is available in the Partnership policies covering data protection, CCTV, information and communication systems, and social media which are available on the Partnership's website and Intranet pages, and in the staffrooms.
- 3.4 We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

4 How we will use your sensitive information

4.1 This includes information which reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic information, biometric information used for identification purposes, or information relating to your health, sex life or sexual orientation. It also includes information about your criminal record, offences and related security measures. We will use sensitive information about you in the following ways:

- 4.1.1** to monitor and make decisions about leaves of absence, which may include sickness absence or family-related leave, to comply with employment and other laws. Details of your sex and sexual orientation and physical and mental health and disability status will be used for these purposes;
- 4.1.2** to check your right to work and suitability for the role. Information about your racial or ethnic origin, criminal records information and physical and mental health and disability status will be used for these purposes;
- 4.1.3** to assess your fitness to work, to provide workplace adjustments and to monitor and manage sickness absence and administer benefits. Information related to your physical and mental health and disability status and your sex will be used for these purposes;
- 4.1.4** to comply with our legal obligations in relation to criminal records checks. Your criminal records information will be used for these purposes; and
- 4.1.5** to monitor your working arrangements and ensure that you are paid in accordance with your contract.

5 Who we share your personal information with

5.1 We will only share your personal information with:

- 5.1.1** law enforcement or other authorities as required by applicable law;
- 5.1.2** our external payroll administrators;
- 5.1.3** benefit providers such as pension administrators;
- 5.1.4** our insurers and insurance brokers;
- 5.1.5** HMRC for tax purposes;
- 5.1.6** hotels for the purposes of business travel;
- 5.1.7** the Disclosure and Barring Service (DBS) for the purposes of vetting;
- 5.1.8** our Local Authority and other Local Authorities, as required;
- 5.1.9** the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007, as amended, where required;
- 5.1.10** teachers' unions, including NCTL;
- 5.1.11** our medical, occupational health and other professional advisors;
- 5.1.12** absence insurance providers;
- 5.1.13** counselling providers;
- 5.1.14** our childcare vouchers administrators;

- 5.1.15 legal advisors and online HR provider software packages;
- 5.1.16 local education providers for the purposes of providing apprenticeships;
- 5.1.17 School Information Management systems;
- 5.1.18 schools within the Coastal Learning Partnership, as required;
- 5.1.19 training providers, as required;
- 5.1.20 employment agencies;
- 5.1.21 potential purchasers of some or all of the business, or if Coastal Learning Partnership or substantially all of its assets are acquired by a third party; and
- 5.1.22 other employers to whom you apply for a job and in response to a request from them for a reference. We will not share sensitive personal information with them.

5.2 Where possible, information will be anonymised but this may not always be practicable. We will not share your personal information with any other third party.

6 How long your personal information will be kept

- 6.1 We will hold your personal information securely in accordance with our data retention documents which are available on request from the Data Protection Officer.
- 6.2 Recordings of telephone calls are retained for one month.

7 Reasons we can collect and use your personal information

- 7.1 Under the General Data Protection Regulation (GDPR) and other applicable data protection laws, we rely on the following lawful bases in order to collect and use your information:
 - 7.1.1 the performance of a contract with you, or to take steps to enter into a contract;
 - 7.1.2 compliance with a legal obligation (including our obligations to you under employment and health and safety legislation, tax regulation and under statutory codes of practice, such as those issued by Acas);
 - 7.1.3 on the basis of our legitimate interest or those of a third party (such as a health insurance provider), but only if these are not overridden by your interests, rights or freedoms;
 - 7.1.4 performance of a task carried out in the public interest as an education provider; and
 - 7.1.5 with your consent, which will be obtained in advance where required.
- 7.2 In addition, concerning any sensitive personal information, we rely on the following conditions:
 - 7.2.1 explicit consent from you;
 - 7.2.2 necessary to carry out the obligations and exercise specific rights in the field of employment and social security and social protection;
 - 7.2.3 to protect your vital interests;
 - 7.2.4 where necessary for the establishment, exercise or defence of legal claims;
 - 7.2.5 where necessary for reasons of public interest.
- 7.3 The collection of your personal information will benefit the organisation and local users by:

- 7.3.1 improving the management of information across the Coastal Learning Partnership;
- 7.3.2 enabling the Partnership to develop a comprehensive picture of the workforce and how it is deployed;
- 7.3.3 informing the development of recruitment and retention policies;
- 7.3.4 allowing better financial modelling and planning;
- 7.3.5 enabling monitoring of selected protected characteristics, where relevant; and
- 7.3.6 enabling individuals to be paid.

8 Consequences of our use of your personal information

Our processing of your personal information allows us to decide whether or not to enter into a contract with you, to perform that contract and manage it in the interests of our business and for the purposes of performing our public task.

9 Transfer of your information out of the EEA

We do not intend to transfer your information out of the UK or outside of the EEA during the course of our general operations. The information we hold is stored in the UK. In the event that we do need to transfer your information overseas, we will inform you accordingly.

10 Your rights

10.1 Under data protection laws you have a number of important rights which you can exercise free of charge. In summary, these include the right to:

- 10.1.1 access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;
- 10.1.2 require us to correct any mistakes in your personal information which we hold;
- 10.1.3 require the erasure of personal information concerning you in certain situations;
- 10.1.4 restrict our processing of your personal information in certain circumstances;
- 10.1.5 receive your personal information which you have provided to us, in a structured, commonly used and machine-readable format and require us to transmit that information to a third party in certain situations;
- 10.1.6 object to processing of your personal information where your interest in stopping the processing overrides ours.

10.2 For further information on each of those rights, including the circumstances in which they apply, see the [guidance](#) from the UK Information Commissioner's Office (ICO) on individual rights under the General Data Protection Regulation.

10.3 If you would like to exercise any of those rights, please:

- 10.3.1 email, call or write to the Data Protection Officer (please see How to Contact Us below);
- 10.3.2 provide enough information to identify you – for example, your full name;
- 10.3.3 provide proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- 10.3.4 detail the information to which your request relates.

11 Keeping your personal information secure

- 11.1** 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.
- 11.2** We also have procedures in place to deal with any suspected information security breach. We will notify you and any applicable regulator of a suspected information security breach where we are legally required to do so.

12 How Government uses your information

- 12.1** The workforce information that we lawfully share with the DfE through information collections:
- 12.1.1** informs departmental policy on pay and the monitoring of the effectiveness and diversity of the school workforce;
 - 12.1.2** links to school funding and expenditure; and
 - 12.1.3** supports 'longer term' research and monitoring of educational policy.

13 Information collection requirements

To find out more about the information collection requirements placed on us by the Department for Education including the information that we share with them, go to [data collection and censuses for schools](#).

14 Sharing by the Department for Education (DfE)

- 14.1** The DfE may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:
- 14.1.1** conducting research or analysis;
 - 14.1.2** producing statistics; and
 - 14.1.3** providing information, advice or guidance.
- 14.2** The Department has robust processes in place to ensure that the confidentiality of personal information is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal information to third parties are subject to a strict approval process and based on a detailed assessment of:
- 14.2.1** who is requesting the information;
 - 14.2.2** the purpose for which it is required;
 - 14.2.3** the level and sensitivity of information requested; and
 - 14.2.4** the arrangements in place to securely store and handle the information.
- 14.3** 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 information. To contact the department, please go to: <https://www.gov.uk/contact-dfe>.

15 How to complain

- 15.1** We hope that we can resolve any query or concern you raise about our use of your information. If you have a concern about the way we are collecting or using your information, we ask that you raise your concern with us in the first instance.
- 15.2** You also have the right to complain to the UK Information Commissioner, who may be contacted at <https://ico.org.uk/concerns/> or by telephone on 0303 123 1113. If you live or work elsewhere in the EU or EEA, you can also complain to your local supervisory authority.

16 Changes to this privacy notice

We may change this privacy notice from time to time. We will notify you of significant changes.

17 How to contact us

- 17.1** Please contact our Data Protection Officer if you have any questions about this privacy notice or the information we hold about you.
- 17.2** If you wish to contact our Data Protection Officer please:
- 17.2.1** send an email to sue.grey@coastalpartnership.co.uk;
 - 17.2.2** write to c/o Heathlands Primary Academy, Andrews Close, Springwater Road, Bournemouth, BH11 8HB;
or
 - 17.2.3** call 01202 651000.

18 Do you need extra help?

- 18.1** If you would like this notice in another format (for example, audio, large print, braille) please contact us (see 'How to contact us' above).