Vanguard Learning Trust

VLT staff privacy notice - Data Protection Act 1998/2018, September 2025

Under data protection law, individuals have a right to be informed about how the Trust uses any personal data that it holds about them. The Trust complies with this right by providing 'privacy notices' to individuals where their personal data is being processed. This privacy notice explains how personal data about staff is collected, stored and used. It also covers the information held as part of the recruitment process for candidates applying for a job within the Trust. This document is published on the Trust's website. Vanguard Learning Trust is a registered 'data controller' for the purposes of data protection law. The Trust has a central data protection policy, a copy of which can be obtained from the Trust website. Each school within the Trust has appointed a data protection lead who is the first point of contact for any queries or subject access requests. The Trust is also required to appoint a data protection officer (DPO) and the Trust's DPO is: Miss Karen Williams, Business Manager, kwilliams@vynersschool.org.uk, 01895 234342.

Personal data held

Data is processed relating to employees and people who otherwise engage with the Trust. Personal data that is collected, used, stored and shared (when appropriate) about staff includes, but is not restricted to:

- contact details
- date of birth, marital status and gender
- next of kin and emergency contact numbers
- some medical information
- 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, references and other information included in an application form, 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 Management information
- outcomes of any disciplinary and/or grievance procedures (retained in line with Trust policies)
- absence data
- copy of driving license (if using a school minibus)
- photographs
- CCTV footage
- data about the use of the school's ICT systems
- data on a person's social media presence (obtained as part of the initial recruitment process)

It may also be necessary to collect, store and use information about staff that falls into 'special categories' of more sensitive personal data. This includes information about (where applicable):

- race, ethnicity, religious beliefs, sexual orientation and political opinions;
- trade union membership; and
- health, including any medical conditions, and sickness records.

Why this data is used

The purpose of processing this data is to help run the Trust, including to:

- enable staff to be paid;
- facilitate safe recruitment, as part of the Trust's safeguarding obligations towards students;
- ensure staff's safety and wellbeing whilst engaged on Trust business;
- support effective performance management and pay progression;

- inform recruitment and retention policies;
- allow better financial modelling and planning;
- Enable ethnicity and disability monitoring; and
- improve the management of workforce data across the sector.

Personal data, including CCTV footage, may be used (and shared with relevant third parties) as part of investigations into staff and student conduct. Staff are advised that any communications from them contained in Trust IT systems (including Google Drive, Google Mail and Google Classroom) may be disclosable to parents and students as part of a subject access request.

The lawful basis for using data

The Trust only collects and uses personal information about staff when the law allows it to. Most commonly, it is used to:

- fulfil a contract the Trust has entered into with an employee;
- comply with a legal obligation; or
- carry out a task in the public interest.

Less commonly, personal information may also be used when:

- an employee has given consent to use it in a certain way (consent may be sought in writing, electronically or verbally); or
- there is a need to protect an employee's vital interests (or someone else's interests).

Some of the reasons listed above for collecting and using personal information about staff overlap, and there may be several grounds which justify the school's use of the data. Where consent has been provided to use data, an individual may withdraw this consent at any time by contacting Karen Williams in writing (or by email).

Collecting information

While the majority of information collected from employees is mandatory, there is some information that individuals can choose whether or not to provide. Whenever information is requested from staff, it is made clear whether it must be provided (and if so, what the possible consequences are of not complying), or whether there is a choice.

How data is stored

An employment file is created and maintained for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to their employment. Once an individual's employment with the Trust has ended, the file will be retained and the information in it will be deleted in accordance with the Information and Records Management Society's 'record retention guidelines' (a copy of which is available on the Trust's website).

Data sharing

No information is shared about employees with any third party without their consent, unless the law and the Trust's policies allow it to be done. Where it is legally required or necessary (and it complies with data protection law) personal information about staff may be shared with:

- **the London Borough of Hillingdon:** to meet the Trust's legal obligations to share certain information with it, such as safeguarding concerns;
- **The Department for Education:** to meet the Trust's legal obligations to share certain information with it, such as workforce data;
- **Other educational organisations or employers/recruitment agencies:** for example to provide employment references when an individual is seeking to develop their career;
- **The Home Office:** in particular the visa sponsorship section who issue permits to work for overseas nationals;
- **Ofsted:** to meet the Trust's obligations in relation to the statutory inspection of state schools;
- **Other schools within Vanguard Learning Trust:** where services are provided to the Trust as a whole;

- **Suppliers and service providers:** particularly online payment systems, biometric identification systems, communication/scheduling systems and school management information systems to enable them to provide the service they have been contracted for;
- **Online training hub:** in order to facilitate staff access to online training materials. Personal details are limited to staff email address and full name;
- **Pension providers:** the Teachers' Pension Scheme (TPS), the local government pension scheme (LGPS) and the local authority);
- **The Trust's external payroll bureau**: the third-party providers that administer the Trust's payroll;
- **External and internal auditors**: the third-party providers carrying out statutory auditing processes;
- **Finance Systems:**
    - **Budgeting system**: which provides the salary budgeting tool used by the central finance team;
    - **Accounting system**: which holds address details and bank details for supplier payment purposes
    - **Purchase order and invoice system** : which holds address details and bank details for supplier payment purposes
- **HMRC**: to meet the Trust's legal obligations in relation to the settlement of tax;
- **The Health and Safety Executive:** to comply with the Trust's statutory obligation in relation to accident and RIDDOR reporting;
- **Health authorities**: including occupational health advisors (only with an employee's consent) and potentially the emergency services; and
- **The Disclosure and Barring Service (DBS): i**n relation to the provision of statutory DBS checks.

The Trust will routinely put information into the public domain in order to demonstrate the high standards of education being delivered within the Trust. This information will be limited to the name, job title and a possible picture of an individual. Information will be used in such places as the Trust website, in regular newsletters and updates and in documents showcasing Trust-wide student activities and school improvement work.

Job applicants

Individuals applying for employment at Vanguard Learning Trust will have their personal data processed in line with the guidance above. Information about unsuccessful applicants will be deleted six months after the recruitment process has been concluded.

The Trust's application form deliberately segregates personal information supplied by applicants and ensures that wider Trust staff involved in the recruitment process (outside HR) only have access to information regarding a candidate's qualifications and experience during the shortlisting and interviewing process. Personal data such as home address, contact details, ethnicity, date of birth, etc. will be withheld.

Google Meet

The Trust's preferred video meeting platform is Google Meet which is used for conducting remote meetings and events. The Trust's usual standards of behaviour operate in Google Meet sessions. Google meet sessions hosted by the Trust will not routinely be recorded. When they are, it will be made clear at the start of the session.

Photographs/film footage of staff

The Trust reserves the right to take photos at official events, such as concerts, staff conferences, and other Trust-wide events. Such photos are intended as an official record of the event and may be shared internally within the Trust community, or used in publicity material. Staff who do not wish to be a part of such photos are empowered to remove themselves from shot, or to make it known before an event that they wish to be excluded. Photographs may also be taken at more social events. Where the Trust intends to take photos, staff will be informed beforehand. Staff are asked to note that the school cannot control the taking or publication of unofficial photos taken by other members of staff. When choosing to publish private photos taken at a school event, all staff are reminded of the guidance contained in the VLT ICT Acceptable Usage Policy (a copy

of which is available on the VLT website) concerning the publication of photographs, especially on social media forums.

Transferring data internationally

When personal data is transferred to a country or territory outside the European Economic Area, it will be done in accordance with data protection law.

Employees' rights: how to access personal information

Individuals have a right to make a 'subject access request' to gain access to personal information that the Trust holds about them. If a subject access request is made, and if the Trust holds the information, it will:

- provide the employee a description of it;
- tell the employee why it is being held and processed, and how long it will be kept for;
- explain where it was collected from, if not from the employee;
- tell the employee who it has been, or will be, shared with;
- Let the employee know whether any automated decision-making is being applied to the data, and any consequences of this; and
- provide the employee with a copy of the information in an intelligible form.

Employees may also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances. If employees would like to make a request, they should contact Karen Williams.

Other rights regarding data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. They have the right to:

- object to the use of their personal data if it would cause, or is causing, damage or distress;
- prevent their data being used to send direct marketing;
- object to the use of their personal data for decisions being taken by automated means (by a computer or machine, rather than by a person);
- in certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing; and
- claim compensation for damages caused by a breach of the data protection regulations.

To exercise any of these rights, employees should contact Karen Williams.

Complaints

The Trust takes any complaints about collection and use of personal information very seriously. If an individual thinks that the collection or use of personal information is unfair, misleading or inappropriate, or they have any other concerns about the Trust's data processing, they should raise it with the data protection lead for the relevant school in the first instance. If they are unsatisfied after they have spoken to them, they can raise an official complaint via the Vanguard Learning Trust complaints policy (available on the Trust website (click here). Employees can also make a complaint to the Information Commissioner's Office using the following channels of communication:

- Online here
- By phone on 0303 123 1113
- In writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Version history

First issue/revision date	Approved by	Summary of changes if not first issue
October 2025	BoT	Rewritten based on template provided by Trust's DPO.
2018	BoT	New policy