



BONITAS TRUST PRIVACY NOTICE – STAFF

BONITAS MULTI-ACADEMY TRUST PRIVACY STATEMENT

Bonitas Multi-Academy Trust is committed to protecting the privacy and security of personal data. We collect and process personal information about students, parents, carers, staff, governors, trustees and visitors across our schools to meet our statutory obligations, deliver education services, and safeguard those in our care. This privacy notice explains how personal data is collected, used, and shared by each school within the Trust, in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and related guidance.

This notice is provided in accordance with Article 13 of the UK General Data Protection Regulation (UK GDPR) to inform you of how your personal data is collected, used, and protected.

Each school within Bonitas Multi-Academy Trust is a data controller for the personal data it holds, with the Trust acting as a joint controller where services, policies, or systems are delivered centrally. The Trust provides oversight, systems, and services to support data protection compliance.”

Introduction

Under data protection law, employees and workers have the right to be informed about how their personal data is used. This privacy notice explains how Bonitas Multi-Academy Trust and its schools collect, store, and use personal data about individuals who work for us.

We, Bonitas Multi-Academy Trust, are the ‘data controller’ for the purposes of data protection law. The Trust Lead for data protection is [Insert].

Our Data Protection Officer is TurnItOn:

Name	TurnItOn
Address	Unit 1F, Network Point, Range Road, Witney, Oxon, OX29 0YN
Email	office@turniton.co.uk
Phone	01865 597620

For further details, contact your school’s headteacher or line manager.

The Personal Data We Collect and Use

We collect and process a range of information about our staff, including but not limited to:

- Personal details (e.g. name, address, contact information, date of birth, gender)
- Employment details (e.g. job title, salary, start and end dates, working hours, absence records, qualifications)
- Recruitment information (e.g. application form, interview notes, references)
- Contract information (e.g. contract type, terms, employment checks, right to work documentation)
- Payroll and pensions data
- Bank account and tax details (e.g. National Insurance number, HMRC info)
- Appraisal and performance management records

- Training records (including safeguarding training)
- Disciplinary and grievance information
- Medical or health information, including occupational health
- Next of kin and emergency contact details
- CCTV images (where used on-site)
- Photographs (e.g. for ID badges, school websites, newsletters)
- Data relating to the use of IT systems (e.g. email and internet usage)
- Trade union membership (only if voluntarily declared)

Some of this information may be considered special category data (e.g. health, ethnicity, trade union membership) and is processed with additional protections.

Why We Use This Data

We collect and use this data to:

- Manage employment and HR processes (e.g. recruitment, contracts, payroll, performance)
- Support staff development and training
- Monitor equality, diversity, and inclusion
- Ensure the safety and security of pupils, staff, and premises
- Comply with legal and regulatory obligations (e.g. safeguarding, tax, pensions)
- Maintain accurate records and fulfil reporting duties (e.g. workforce census)
- Provide references where requested
- Promote the work of the school or Trust (e.g. photos for newsletters or websites)

Our Legal Basis for Processing Your Information

We only collect and use personal data when we have a lawful basis under data protection law.

Most commonly, we process staff data where:

- We need to meet our legal obligations as an employer (e.g. Right to Work checks, HMRC reporting)
- We need to carry out tasks in the public interest (e.g. running a school)
- We have your consent (e.g. for the use of photographs or biometric data, where applicable)
- It is necessary to protect someone's vital interests

Where we rely on consent (for example, for the use of photographs in newsletters, websites, or public-facing materials), you are free to withdraw your consent at any time without consequence.

Some processing activities, such as the use of IT monitoring systems, are not based on consent but are necessary for the Trust's legitimate interests or to meet our safeguarding, legal, or operational obligations. These activities are proportionate and subject to appropriate safeguards.

We may also process special category data where it is necessary for:

- Employment or social security law
- Reasons of substantial public interest (e.g. equality monitoring)

- Preventing or detecting unlawful acts
- Occupational health purposes

Collecting This Information

Most of the information we collect about staff is mandatory to fulfil your employment contract or our legal duties. In some cases, you can choose whether to provide personal data. We will always let you know when this is the case.

Storing Your Data

We keep personal information only for as long as necessary to fulfil our employment, legal, and operational obligations.

Retention periods are based on guidance from the Information and Records Management Society (IRMS) and statutory requirements. A copy of the Trust data retention policy is available on request.

Data Sharing

We do not share your personal data with any third party without your consent unless the law and our policies allow us to do so.

Where it is necessary and compliant with data protection law, we may share personal data with:

- Local authorities
- The Department for Education (DfE)
- HM Revenue & Customs (HMRC)
- Payroll and pensions providers (e.g. Teachers' Pensions, Local Government Pension Scheme)
- Occupational health services
- Disclosure and Barring Service (DBS)
- External HR, legal, and insurance providers
- Professional bodies (e.g. TRA, Ofsted)
- IT support providers and cloud systems used by the Trust
- Trade unions (if applicable and consent is given)
- Police or courts, where legally required

Transferring Data Internationally

If we need to transfer personal data to countries outside the UK or EEA, we will ensure appropriate safeguards are in place in line with data protection law.

Your Rights

You have the right to:

- Access your personal data (via a Subject Access Request)
- Request rectification of inaccurate data
- Request erasure of personal data in some circumstances
- Object to or restrict data processing in certain situations



- Withdraw consent, where processing is based on consent
- Lodge a complaint with the Information Commissioner's Office (ICO)

To exercise these rights, contact the Data Protection Officer via your school or Trust.

Complaints

We take any complaints about data use seriously. If you have concerns, please raise them with your line manager or contact the Data Protection Officer.

You can also contact the ICO at:

Website: <https://ico.org.uk/concerns>

Phone: 0303 123 1113

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Contact Us

If you have any questions or concerns about this notice or how we handle your data, please speak to your line manager or contact:

Bonitas Multi-Academy Trust: ithelpdesk@bonitas.org

School-specific contact: esavage@jennetts.bonitas.org.uk

Data Protection Officer (TurnITon) Email: office@turniton.co.uk