

## **PRIVACY NOTICE FOR EMPLOYEES, WORKERS, AND CONTRACTORS**

### 1. What is the purpose of this document?

- 1.1. The Learning Trust (“the Trust”) is committed to protecting the privacy and security of your personal information. 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 UK General Data Protection Regulation (“UK GDPR”), Data Protection Act 2018 and Data (Use and Access) Act 2025 (“DUAA”). It applies to all employees, workers and contractors.
- 1.2. The 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.
- 1.3. This notice applies to current and former employees, workers, contractors and those who are otherwise self-employed. 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 provide you with an updated copy of this notice as soon as reasonably practical.
- 1.4. It is important that you read 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.

### 2. Data protection principles

- 2.1. We will comply with data protection law. This says that the personal information we hold about you must be:
  - 2.1.1. Used lawfully, fairly and in a transparent way.
  - 2.1.2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
  - 2.1.3. Relevant to the purposes we have told you about and limited only to those purposes.
  - 2.1.4. Accurate and kept up to date.
  - 2.1.5. Kept only as long as necessary for the purposes we have told you about.
  - 2.1.6. Kept securely.

3. The kind of information we hold about you

- 3.1. 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).
- 3.2. There are "special categories" of more sensitive personal data, which require a higher level of protection.
- 3.3. We may collect, store, and use the following categories of personal information about you:
  - 3.3.1. Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
  - 3.3.2. Date of birth.
  - 3.3.3. Gender.
  - 3.3.4. Marital status.
  - 3.3.5. Next of kin and emergency contact information.
  - 3.3.6. National Insurance number.
  - 3.3.7. Bank account details, payroll records and tax status information.
  - 3.3.8. Salary, annual leave, pension and benefits information.
  - 3.3.9. Start date and, if different, the date of your continuous employment.
  - 3.3.10. Location of employment or workplace.
  - 3.3.11. Identity documents (such as driving licence, passport, birth certificate etc.)
  - 3.3.12. Records of online searches, for example, social media website records.
  - 3.3.13. 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).
  - 3.3.14. Employment records (including job titles, qualification level, work history, working hours, training records and professional memberships).
  - 3.3.15. Compensation history.
  - 3.3.16. Performance information.



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- 3.3.18. Disciplinary and grievance information.
- 3.3.19. CCTV footage and other information obtained through electronic means such as swipe cards/fobs for access doors.
- 3.3.20. Information about your use of our information and communications systems.
- 3.3.21. Photographs.
- 3.4. We may also collect, store and use the following "special categories" of more sensitive personal information:
  - 3.4.1. Information about your race or ethnicity.
  - 3.4.2. Trade union membership.
  - 3.4.3. Information about your health, including any medical condition, health, and sickness records.
  - 3.4.4. Genetic information and biometric data.
  - 3.4.5. Information about criminal convictions and offences.

4. How is your personal information collected?

- 4.1. We typically collect personal information about employees, workers, and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or a background and DBS check provider. We may sometimes collect additional information from third parties including former employers and supplied referees, credit reference agencies or other background check agencies including the Department for Education in relation to teaching sanctions.
- 4.2. We will collect additional personal information in the course of job-related activities throughout the period of you working for us.
- 4.3. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with the UK GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this and we will tell you what you need to do if you do not want to share this information with us.

5. How we will use information about you

- 5.1. 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:
  - 5.1.1. Where we need to perform the contract we have entered into with you.



5.1.2. Where we **THE LEARNING TRUST** need to comply with a legal obligation. NURTURING • AMBITION • EXCELLENCE

5.1.3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

5.2. We may also use your personal information in the following situations, which are likely to be rare:

5.2.1. Where we need to protect your interests (or someone else's interests).

5.2.2. Where it is needed in the public interest or for official purposes.

6. Situations in which we will use your personal information

6.1. We need all the categories of information in the list above (see the kind of information we hold about you) primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

<u>Type of personal data</u>	<u>Reason for processing</u>		
	To perform our contract with you	To enable us to comply with legal obligations	To pursue legitimate interests of our own or those of third parties
Making a decision about your recruitment or appointment.	✓	✓	
Determining the terms on which you work for us.	✓		
Checking you are legally entitled to work in the UK.	✓	✓	
Ensure safety of pupils whilst in your care.	✓	✓	
Paying you and, if you are an employee, deducting tax and National Insurance contributions.	✓	✓	
Providing benefits to you including but limited to: Cycle to Work Childcare Vouchers Deduction of Trade Union subs	✓	✓	
Liaising with your pension provider.	✓	✓	
Administering the contract we have entered into with you.	✓		
Business management and planning, including accounting and auditing.		✓	✓



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Conducting performance reviews, managing performance, and determining performance requirements.	✓		
Making decisions about salary reviews and compensation.	✓	✓	
Assessing qualifications for a particular job or task, including decisions about promotions.	✓	✓	
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.	✓	✓	
Education, 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 policies.	✓	✓	✓
To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.	✓	✓	✓
To conduct data analytics studies to review and better understand employee retention and attrition rates.			✓
Equal opportunities monitoring.	✓	✓	✓
In relation to external activities such as school trips or training courses.	✓	✓	
In using communication modules and software within the Trust (such as SIMs and Synergy).	✓		



Some of the above grounds there may be several your personal information. **THE LEARNING TRUST** for processing will overlap and grounds, which justify our use of  
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7. If you fail to provide personal information

7.1. 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).

8. Change of purpose

8.1. 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.

8.2. 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.

9. How we use particularly sensitive personal information

9.1. "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:

9.1.1. In limited circumstances, with your explicit written consent.

9.1.2. Where we need to carry out our legal obligations and in line with our Data Protection Policy.

9.1.3. Where it is needed in the public interest, such as for equal opportunities monitoring, and in line with our data protection policy.

9.1.4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

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. We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

10. Situations in which we will use your sensitive personal information

10.1. 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



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.

- 10.1.1. We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- 10.1.2. 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 and statutory sick pay.
- 10.1.3. We will use information about your race or national or ethnic origin, religious, philosophical, or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- 10.1.4. 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.
- 10.1.5. Biometric data will be used in line with our Protection of Biometric Information Policy.

## 11. Do we need your consent?

- 11.1. 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.
- 11.2. 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.
- 11.3. We do not need your consent where the purpose of the processing is to protect you or another person from harm or to protect your well-being and if we reasonably believe that you need care and support, are at risk of harm and are unable to protect yourself.

## 12. Information about criminal convictions

- 12.1. 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.



12.2. Less commonly, we **THE LEARNING TRUST** may use information relating to criminal convictions NURTURING • AMBITION • EXCELLENCE where it is necessary in relation to legal claims, where it is necessary 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.

12.3. We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

12.4. We envisage that we will hold 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 in the course of you working for us. We will use information about criminal convictions and offences in order to maintain appropriate safeguards for working with children.

12.5. We are allowed to use your personal information in this way to carry out our legal obligations in respect of working with children.

### 13. Automated decision-making

13.1. Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention, as permitted by the DUA 2025. This includes AI systems. We are allowed to use automated decision-making in the following circumstances:

13.1.1. Where we have notified you of the decision and given you 21 days to request a reconsideration.

13.1.2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.

13.1.3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

13.2. If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

13.3. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

13.4. We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

### 14. Data sharing



14.1 We routinely share **THE LEARNING TRUST** your information with the Local Authority, where applicable, NURTURING • AMBITION • EXCELLENCE and the Department for Education. We do not share information about you with anyone without your consent, unless the law and our policies allow us to do so.

14.2 We may have to share your data with third parties, including third-party service providers and other entities in the Trust.

14.3 We require third parties to respect the security of your data and to treat it in accordance with the law.

14.4 We will not transfer your personal information outside the EU.

15. Why might you share my personal information with third parties?

15.1. We may 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.

16. Which third-party service providers process my personal information?

16.1. "Third parties" includes third-party service providers (including contractors and designated agents) and other entities within the Trust. The following activities are carried out by third-party service providers: payroll and expenses, pension administration, benefits provision and administration, IT services, school trips/visits and related management, occupational health, catering, training, payment systems, management and communications systems (such as SIMs, and Synergy).

16.2. We are required to share information about our workforce members with our local authority under Section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

16.3. We share personal data with the Department of Education on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding/expenditure and the assessment of educational attainment.

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

17. How secure is my information with third-party service providers and other entities in the Trust?

17.1. All our third-party service providers and other entities in the group 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.

18. Data collection requirements – Department for Education



- 18.1. The School Workforce with the Department **THE LEARNING TRUST** Census data that we lawfully share for Education through data collections: NURTURING • AMBITION • EXCELLENCE
- 18.1.1. Informs the DfE's policy on pay and the monitoring of the effectiveness and diversity of the Trust workforce.
  - 18.1.2. Links to Trust funding and expenditure.
  - 18.1.3. Supports 'longer term' research and monitoring of educational policy.
- 18.2. The Department for Education collects and processes personal data relating to those employed by schools (including multi academy trusts) and local authorities that work in state funded schools including all academies. Our schools make a census submission because it is a statutory return under Sections 113 and 114 of the Education Act 2005.
- 18.3. To find out more about the data collection requirements placed on us by the Department for Education, including the data that we share with them, go to [www.gov.uk/education/data-collection-and-censuses-for-schools](http://www.gov.uk/education/data-collection-and-censuses-for-schools).
- 18.4. All data is transferred securely and held by the Department for Education under a combination of software and hardware controls, which meet the current Government security policy framework. <https://www.gov.uk/government/publications/security-policy-framework>
- 18.5. The Department for Education may share information about school employees with third parties who promote the educational wellbeing of children or the effective deployment of school staff in England by:
- 18.5.1. conducting research or analysis.
  - 18.5.2. producing statistics.
  - 18.5.3. providing information, advice, or guidance.
  - 18.5.4. For privacy information on the data the Department for Education collects and uses, please see: <https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers>.
- 18.6. The Department for Education has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether the Department for Education releases personal data to third parties is subject to a strict approval process and based on a detailed assessment of:
- 18.6.1. who is requesting the data.
  - 18.6.2. the purpose for which it is required.
  - 18.6.3. the level and sensitivity of the data requested.
  - 18.6.4. the arrangements in place to securely store and handle the data.
- 18.7. 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 data. For more information about the Department for Education's data sharing process, please visit: [www.gov.uk/data-protection-how-we-collect-and-share-research-data](http://www.gov.uk/data-protection-how-we-collect-and-share-research-data).



18.8. Further information regarding the Department for Education's data collection requirements can be obtained by contacting the Department directly at [www.gov.uk/contact-dfe](http://www.gov.uk/contact-dfe).

19. How to find out what personal information the Department for Education hold about you

19.1. Under the terms of the Data Protection Act 2018, you are entitled to ask the Department for Education:

- 19.1.1. if they are processing your personal data;
- 19.1.2. for a description of the data they hold about you;
- 19.1.3. the reasons they are holding it and any recipient it may be disclosed to;
- 19.1.4. for a copy of your personal data and any details of its source.

19.2. If you want to see the personal data held about you by the Department for Education, you should make a 'Subject Access Request'. Further information on how to do this can be found within the Department for Education's personal information charter that is published at the following address:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>.

19.3. To contact the department: <https://www.gov.uk/contact-dfe>.

20. What about other third parties?

We may share your personal information with other third parties, for example in relation to ensure appropriate motor insurance and dealing with school photos. We may also need to share your personal information with a regulator, or the local authority or to otherwise comply with the law.

21. Data security

21.1 We have put in place measures to protect the security of your information. The Trust has a Data and Cyber Breach Prevention Policy and Cyber Response Plan, a copy of which can be found in the shared drive at each of the Trust's schools.

21.2 In line with the UK GDPR, The Learning Trust will appropriately test, assess, and evaluate any security measures put in place on a termly basis to ensure these measures remain effective. All schools will employ firewalls in order to prevent unauthorised access to the systems. Details of these measures are available upon request from the Trust's Director of IT & Data Protection Officer at [dpo@tltrust.co.uk](mailto:dpo@tltrust.co.uk).

21.3 Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

21.4 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are



subject to a duty of confidentiality. Details of these measures may be obtained on request.

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- 21.5 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.
- 21.6 Please see the Trust's Personal Data Breach Procedure for further details. This procedure **MUST** be followed by all of The Learning Trust's staff in the event of an actual or potential personal data breach. All personal data breaches must be recorded.

## 22. Data retention

- 22.1. 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 on request.
- 22.2. 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. We also take advice from external sources.

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 and applicable laws and regulations. For more information, please see our policy on Data Protection Employee Retention of Records Guidelines.

## 23. Rights of access, correction, erasure, and restriction

- 23.1. 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.
- 23.2. Your rights in connection with personal information: Under certain circumstances, by law you have the right to:
- 23.2.1. **Request access** to your personal information (commonly known as a "Subject Access Request"). The UK-GDPR gives you certain rights about how your information is collected and used. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. If you want to request access to the personal information we hold about you, please contact the Trust's Data Protection Officer on [dpo@tltrust.co.uk](mailto:dpo@tltrust.co.uk) or view the Trust's SAR Policy.
- 23.2.2. **To be informed** about the collection and use of your personal data.



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- 23.2.3. **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.
- 23.2.4. **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- 23.2.5. **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation, which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- 23.2.6. **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- 23.2.7. **Request the transfer** of your personal information to another party.
- 23.2.8. **To [complain to the Information Commissioner](#)** if you feel we have not used your information in the right way.
- 23.3. If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Trust's Data Protection Officer at [dpo@tltrust.co.uk](mailto:dpo@tltrust.co.uk).
- 23.4. **No fee usually required:** 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 your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- 23.5. **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.
- 23.6 There are **legitimate reasons why we may refuse your information rights request**, which depends on why we are processing it. For example, some rights will not apply:
- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
  - right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.



- right to object basis for obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.

does not apply when the lawful processing is contract, legal

#### 24. Right to withdraw consent

24.1 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 the Trust's Data Protection Officer at [dpo@tltrust.co.uk](mailto:dpo@tltrust.co.uk).

24.2 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.

#### 25. Data Protection Officer (DPO)

25.1. We have appointed a DPO to oversee compliance with this privacy notice. If you have any questions about this Privacy Notice or how we handle your personal information, please contact the DPO.

25.2. If you are concerned about the way we are collecting or using your information, please raise your concern with the Trust's DPO in the first instance. You can also contact the Information Commissioner's Office at [ICO - Make a Complaint](#).

25.3. The Trust's DPO is Dave Helsby, Director of IT & DPO ([dpo@tltrust.co.uk](mailto:dpo@tltrust.co.uk)).

#### 26. Changes to this privacy notice

26.1. We may need to update this privacy notice periodically if we change how we collect and process data, and will inform you when this privacy notice has changed; however, we also recommend that you revisit this privacy notice from time to time. We may also notify you in other ways about the processing of your personal information.

26.2. If you have any questions about this privacy notice, please contact the Trust's DPO on [dpo@tltrust.co.uk](mailto:dpo@tltrust.co.uk)

### **DECLARATION**

I, \_\_\_\_\_ (employee/worker/contractor name), acknowledge that on

\_\_\_\_\_ (date), I received a copy of the Trust's Privacy Notice for employees,

workers and contractors and that I have read and understood it.

Signature



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.....

Name

.....

**Date Privacy Notice last updated: -**

Updated March 2022

Reviewed March 2023

Reviewed and updated by DH (DPO) and SW February 2024

Approved by the Trustee Resources Panel: 13 March 2024

Reviewed and updated by DH (DPO) and SW November 2024

Approved by the Trustee Resources Panel; 12 November 2024

Reviewed and updated by DH (DPO) November 2025

Approved by the Board of Trustees on 04 December 2025