# KAT WORKFORCE PRIVACY NOTICE

## What is the purpose of this Notice?

This is our workforce Privacy Notice of Kingstone Academy Trust which is intended to provide you with information about how and why we process your personal information. It is also intended to provide you with other information which is required under the UK General Data Protection Regulation (the retained EU law version of the General Data Protection Regulation (EU) 2016/679) (GDPR) and the Data Protection Act 2018 (DPA). The GDPR and DPA contain the key laws relating to data protection.

It is important to us, and a legal requirement, that we are transparent about how we process your personal information. As a MAT that processes personal information, we are known as a "data controller". This means that we collect and use personal information for specified purposes which this Privacy Notice has been designed to tell you about.

## The Data Protection Officer

The Trust has appointed a Data Protection Officer (DPO), HY Education, who can be contacted by telephone on 0161 543 8884 or by email (DPO@wearehy.com). The DPO is responsible for supporting and advising the MAT in relation to data protection matters and you can contact the DPO should you wish to discuss any issues or concerns that you have about data protection.

## What personal information do we collect?

The types of personal information that we collect will include:-

- personal information (such as name, employee or teacher number, national insurance number, next of kin and contact details)
- special categories of data including characteristics information (such as gender, age, ethnic group, race, and religion)
- recruitment information
- contract information (such as start dates, hours worked, post, roles, subjects taught and salary information)
- work absence information (such as number of absences and reasons, annual leave and maternity leave)
- qualifications, subjects taught and training records
- performance information
- grievance and disciplinary information
- health and safety information (such as accidents at work)
- relevant medical information
- safeguarding information
- DBS information
- CCTV

## What is the purpose of us collecting your personal information?

We process personal information relating to those we employ to work at, or otherwise engage to work across, the MAT. This is for employment purposes to assist in the running of the MAT and to enable individuals to be paid. The purposes for which we process workforce personal information include:-

- enabling the development of a comprehensive picture of the workforce and how it is deployed
- managing the recruitment process
- carrying out pre-employment checks and equal opportunities monitoring

- complying with the terms of the contract of employment
- making reasonable adjustments
- enabling individuals to be paid
- managing absence
- managing performance, grievance, and disciplinary matters
- safeguarding purposes
- managing workplace accidents

**Why is it lawful to collect this information?**
We process your personal information, but no more so than is necessary, to comply with legal obligations which the MAT is subject to or because processing is necessary to comply with the terms and conditions of your contract of employment.

In limited circumstances, we may require your consent. If this is the case, we will inform you of the reasons that we need to process your personal information in accordance with the GDPR and the DPA. You will be able to withdraw your consent at any time should you wish to do so.

Where we process sensitive personal information (special category data) we will usually do this, only as far as necessary, to comply with employment law obligations which we are subject to or because it is in the public interest to do so e.g. for safeguarding reasons.

**Who will we share this information with?**
We are required, by law, to pass on some of this personal information to:

- the Department for Education (DfE)
- HMRC

We may also share information with:

- the local authority
- Health and Safety Executive
- DBS
- insurance providers
- training providers
- professional advisors
- IT and communications technology providers

**How long will we hold your information for?**
We will hold personal information for a period of time specified within our retention policy. We generally hold workforce personal information for the period of your employment until termination and a period of 6 years thereafter. For more information, please ask the DPO for a copy of our retention schedule.

**Department for Education**

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our employees with the (DfE) under section 7 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

All data is transferred securely and held by DfE under a combination of software and hardware controls which meet the current government security policy framework.

For more information, please see 'How Government uses your data' section.

For privacy information on the data the Department for Education (DfE) collects and uses, please see: https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers

**Requesting access to your personal data**

The UK-GDPR gives you certain rights about how your information is collected and used. To make a request for your personal information, contact **[insert]**

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request, data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commissioner if you feel we have not used your information in the right way.

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 does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at raise a concern with ICO

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

**Withdrawal of consent and the right to lodge a complaint**

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the Head of School**]**

**Last updated**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated in **September 2025.**

**Contact**

If you would like to discuss anything in this privacy notice, please contact our DPO.

**How Government uses your data**

The workforce data that we lawfully share with the Department for Education (DfE) through data collections:

- informs the Department for Education (DfE) policy on pay and the monitoring of the effectiveness and diversity of the school workforce
- links to school funding and expenditure
- supports 'longer term' research and monitoring of educational policy

**Data collection requirements**

To find out more about the data collection requirements placed on us by the Department for Education (DfE) including the data that we share with them, go to https://www.gov.uk/education/data-collection-and-censuses-for-schools.

**Sharing by the Department for Education (DfE)**

The Department for Education (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:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department for Education (DfE) will only share your personal data where it is lawful, secure and ethical to do so and 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 (DfE) releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of public benefit, proportionality, legal underpinning and strict information security standards.

For more information about the Department for Education's (DfE) data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-data
For information about which organisations the Department for Education (DfE) has provided information, (and for which project) please visit the following website: https://www.gov.uk/government/publications/dfe-external-data-shares

**How to find out what personal information the Department for Education (DfE) hold about you**
Under the terms of UK GDPR, you're entitled to ask the Department for Education (DfE):

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:

https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter
or
https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights

To contact the Department for Education (DfE): https://www.gov.uk/contact-dfe