

Privacy notice for the school workforce

Kings Academy Trust



Effective from

1 September 2026

Next review

September 2027, or earlier if processing changes

Contents

- 1. Introduction
- 2. Personal information we use
- 3. Why we use it
- 4. Lawful bases
- 5. Special category and criminal offence data
- 6. How we collect information
- 7. Retention and security
- 8. Sharing and international transfers
- 9. Your data protection rights
- 10. Automated decision-making and profiling
- 11. Data protection complaints
- 12. Contact us

1. Introduction

This privacy notice explains how Kings Academy Trust collects and uses personal information about employees, workers, agency staff, contractors, trainees and others engaged to work for the Trust. It applies across the Trust and its academies unless a more specific notice is provided at the point of collection.

Kings Academy Trust is the data controller. We process personal information under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025.

The Trust's Data Protection Officer is Satswana and can be contacted at admin@satswana.com.

2. Personal information we use

- identity and contact information, date of birth, employee or teacher number, National Insurance number and emergency contacts
- recruitment and vetting information, including applications, references, right-to-work evidence, qualifications, employment history and DBS or barred-list information where applicable
- contract, role, working pattern, salary, payroll, tax, pension, benefits, expenses, bank and leave information
- attendance, absence, sickness, occupational-health, disability and workplace-adjustment information
- performance, appraisal, training, capability, conduct, disciplinary, grievance and safeguarding records
- equality-monitoring information and trade-union membership where provided or required
- use of Trust premises, devices, accounts and systems, including access, security, filtering, monitoring and communications logs
- photographs, video, audio and CCTV images, and vehicle or driving information where relevant to the role.

3. Why we use it

- recruit, appoint, employ, pay, support and manage the workforce
- administer contracts, payroll, tax, pensions, benefits, leave and expenses
- meet safeguarding, safer-recruitment, equality, health and safety and employment-law duties
- manage attendance, performance, professional development, conduct, complaints and employment disputes
- protect pupils, staff, premises, networks and information, including through appropriate filtering and monitoring
- plan staffing, budgets and service delivery, and meet audit, regulatory and insurance requirements
- complete statutory workforce data collections and support education policy, funding and workforce planning.

4. Lawful bases

We select the lawful basis that applies to each purpose. The principal bases are:

- Article 6(1)(b), contract: processing necessary to enter into or perform the employment or engagement contract, including pay, benefits, leave and role management
- Article 6(1)(c), legal obligation: processing required by employment, tax, pension, equality, immigration, health and safety, safeguarding, education and accounting law
- Article 6(1)(d), vital interests: processing needed to protect someone's life in an emergency
- Article 6(1)(e), public task: processing necessary for the Trust's education, safeguarding and other official functions that have a clear basis in law
- Article 6(1)(f), legitimate interests: limited processing for organisational security, fraud prevention, legal claims and efficient administration where this is not part of an official public task and individual rights do not override the interest
- Article 6(1)(a), consent: only where a genuine choice is available, such as some optional photographs or communications. Consent is not used for core employment administration.

5. Special category and criminal offence data

Some information needs additional protection under data protection law. The special category data we may use includes:

- health, disability and sickness information
- racial or ethnic origin, religious or philosophical beliefs, sexual orientation and other equality-monitoring information
- trade-union membership
- biometric information, only if technically processed to uniquely identify a person.

We use this information only where it is necessary for the purposes described in this notice and where we have both an Article 6 lawful basis and an Article 9 condition. Depending on the purpose, the Article 9 conditions we rely on are:

- Article 9(2)(b): employment, social-security and social-protection obligations and rights
- Article 9(2)(f): establishing, exercising or defending legal claims
- Article 9(2)(g): substantial public interest, supported by an applicable DPA 2018 Schedule 1 condition
- Article 9(2)(h): occupational-health or health-care purposes where the required confidentiality safeguards apply
- Article 9(2)(a): explicit consent, only where it is appropriate and freely given.

Photographs and ordinary CCTV images are personal data but are not automatically special category data. They become biometric special category data only if they are technically processed to uniquely identify a person.

Where we use information about criminal convictions or offences, including relevant DBS information, we do so under Article 10 UK GDPR and an applicable condition in Schedule 1 of the Data Protection Act 2018. This will normally relate to employment, safeguarding, preventing fraud or protecting children and other vulnerable people. Where required, the Trust maintains an Appropriate Policy Document.

6. How we collect information

We collect information directly from you through recruitment, onboarding, contract, payroll, HR, appraisal, training, absence, occupational-health and IT processes. Some information is mandatory because of a contract or legal requirement; other information is voluntary, and we will make this clear when it is requested.

We may also receive information from referees, previous employers, recruitment agencies, the Disclosure and Barring Service, Teaching Regulation Agency, Department for Education, HM Revenue and Customs, pension providers, local authorities, occupational-health providers, law-enforcement bodies and publicly available sources where lawful.

7. Retention and security

We keep workforce information throughout the employment or engagement and afterwards for the periods set out in the Data Retention Schedule.

The exact period depends on the type of record. We apply the Trust's Data Retention Schedule, taking account of statutory record-keeping duties, safeguarding requirements, financial and audit rules, limitation periods, regulatory guidance and whether information is needed to establish, exercise or defend legal claims. Different periods apply to recruitment, payroll and tax, pensions, safeguarding, personnel, health and safety, training, disciplinary and IT-security records.

We use appropriate technical and organisational measures to protect personal information against accidental loss, unauthorised access, alteration or disclosure. Access is limited to people who need the information for their role. Information is securely deleted or destroyed when it is no longer required.

A copy of the relevant retention schedule or further information about a particular retention period is available from the Data Protection Officer.

8. Sharing and international transfers

Where necessary and lawful, we may share workforce information with:

- the Department for Education and relevant local authorities
- HM Revenue and Customs, pension schemes and payroll, banking and benefits providers
- the Disclosure and Barring Service, Teaching Regulation Agency and other safeguarding or professional regulators

- occupational-health, employee-assistance, absence-management and insurance providers
- auditors, professional advisers, courts, tribunals, police and other public authorities
- IT, communications, security, filtering, monitoring, records-management and other contracted service providers
- other schools or employers where the law permits or you ask us to provide a reference.

Department for Education workforce collections

The Department for Education collects workforce information from schools and academy trusts through statutory data collections. We are required to share information about school employees under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007, as amended.

The data supports workforce policy, pay and diversity monitoring, school funding and expenditure analysis, research and monitoring of education policy. Data is transferred securely. Further information is available at <https://www.gov.uk/education/data-collection-and-censuses-for-schools> and <https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers>.

International transfers

Some service providers may store or allow access to personal information outside the UK. Before making a restricted transfer, we check that UK adequacy regulations apply, or put in place an appropriate safeguard such as the UK International Data Transfer Agreement or UK Addendum and complete the required data protection test. We use an Article 49 exception only where the law permits. Contact the Data Protection Officer for information about the safeguard used for a particular service.

9. Your data protection rights

Depending on the circumstances and the lawful basis being used, you may have the right to:

- be informed about how we use your personal information
- ask for access to the personal information we hold about you
- ask us to correct inaccurate or incomplete information
- ask us to erase information or restrict its use in certain circumstances
- object to processing in certain circumstances, including direct marketing
- receive information in a portable format where the right to data portability applies
- withdraw consent at any time where consent is our lawful basis, without affecting earlier lawful processing
- ask for safeguards and human involvement where a significant decision is made solely by automated means
- complain to us and to the Information Commissioner's Office.

These rights are not absolute. For example, erasure does not normally apply where we must keep information to comply with a legal obligation or perform a public task. We will explain any restriction that applies when responding to a request.

To exercise a right, contact the Data Protection Officer or the Trust's Data Protection Lead using the details in section 12. We may ask for information needed to confirm identity and locate the relevant records.

10. Automated decision-making and profiling

The Trust does not currently make decisions about you based solely on automated processing where the decision has a legal or similarly significant effect. Digital and artificial-intelligence tools may support administrative work, but accountable staff remain responsible for significant decisions.

If this changes, we will update the relevant privacy information before the processing begins and explain the logic involved, likely effects and safeguards, including how to obtain human intervention and challenge a decision.

11. Data protection complaints

You can make a data protection complaint by emailing admin@satswana.com or ddonnelly@kingsacademytrust.co.uk, or by writing to the Trust at the address in section 12. Please describe the issue and the outcome you are seeking.

We will acknowledge receipt within 30 days. Without undue delay, we will make appropriate enquiries, keep you informed where an investigation is continuing, and tell you the outcome and any action taken.

You may also complain to the Information Commissioner's Office. The ICO can be contacted on 0303 123 1113 or through <https://ico.org.uk/make-a-complaint/>. The ICO's postal address is Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

12. Contact us

Kings Academy Trust, City Approach 1, Albert Street, Eccles, M30 0BG

Data Protection Officer: Satswana — admin@satswana.com

Data Protection Lead: David Donnelly — ddonnelly@kingsacademytrust.co.uk