Waterton
Academy Trust

Adult Privacy Notice – How we use your personal information



watertonacademytrust.org

How we use your personal data

Waterton Academy Trust collects and processes personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. We do this for clear, specific, and lawful purposes. The categories of personal data we may collect, hold, and share include:

- **Basic personal information:** Name, employee or teacher number, national insurance number, contact details, next of kin.
- **Special category data:** Gender, age, ethnicity, religious beliefs, SEND, bank details.
- **Contractual and employment information:** Start dates, role descriptions, working hours, salary, performance information, declarations of interest, DBS checks.
- **Absence data:** Dates and reasons for absences.
- **Qualifications and recruitment data:** For appointments, tendering, or internal processes.
- **Identification and safeguarding data:** Right to work documentation, enrolment records.
- **Criminal convictions and offences:** Where relevant to recruitment and safeguarding.
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Why we collect and use this information

We collect and use personal data to:

- Develop a complete picture of the workforce and how it is deployed.
- Support recruitment, retention, and employment practices.
- Administer pay and financial processes.
- Assess fitness to work or engage in education.
- Meet legal obligations in relation to safeguarding, health and safety, equality monitoring, and employment law.
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Lawful basis for processing

We rely on the following legal bases for processing personal data:

- **Performance of a contract:** e.g. employment or service agreements.
- **Legal obligations:** e.g. tax, safeguarding, health and safety.
- **Legitimate interests:** e.g. efficient operation of the Trust and schools.
- **Public task:** Delivering education as a statutory public function.

Where we process special category or criminal offence data, we do so in accordance with the conditions set out in Schedule 1 of the Data Protection Act 2018.

Collecting your information

Most personal data is provided directly by you and is mandatory. Where data is optional, we will explain the reason for its collection and whether you have a choice to provide it.

Storing your information

Personal data is retained according to our **Data Retention Policy**, which sets out how long each category of information is kept. We apply strict security measures and use reputable external service providers, such as cloud-based systems, to ensure data is stored safely and securely.

Who we share your information with

We routinely share personal information with:

- Local Authorities (e.g. Wakefield, Barnsley)
- Department for Education (DfE)
- HMRC and pension providers

- Statutory bodies for reporting and compliance
- Software and IT service providers under contract
- Police, social care services, and safeguarding professionals (where legally required)

Why we share information

We only share personal data where legally required, or where our policies allow us to do so. For example, we must share workforce data with Local Authorities under the Education (Supply of Information about the School Workforce) Regulations 2007.
The DfE collects school workforce data for funding, policy development, and performance analysis. Full details are available at:
https://www.gov.uk/education/data-collection-and-censuses-for-schools
The DfE may also share information with third parties for research and analysis purposes under strict confidentiality and access controls.

DATA COLLECTION REQUIREMENTS

The Department for Education (DfE) collects and processes personal data relating to staff and pupils in state-funded schools, including academies, free schools, special schools, Pupil Referral Units, and other Alternative Provision.
This data collection is a **statutory requirement** under sections 113 and 114 of the Education Act 2005. All state-funded schools are required to complete data returns, such as the school workforce census and pupil-level collections.
The information collected by the DfE supports:

- national policy development and workforce monitoring;
- funding allocations;
- statistical and research analysis;
- compliance monitoring and safeguarding;
- public reporting and performance assessment.

Data Sharing with Third Parties
The DfE may share this information with other approved third parties where there is a legal basis to do so. These third parties may include:

- organisations promoting the education or welfare of children;
- bodies conducting academic or policy research;
- services offering guidance, support, or intervention;
- government departments or regulatory agencies.

Each data sharing arrangement is subject to a strict approval process and is assessed against:

- who is requesting the data;
- the specific purpose for its use;
- the sensitivity and scope of the data requested;
- the measures in place to ensure data is kept secure and confidential.

All organisations receiving data from the DfE must agree to strict terms and conditions covering its storage, handling, retention, and use. These arrangements include:

- access controls and audit trails;
- secure transmission and storage methods;
- clearly defined data destruction schedules.

Further Information
To find out more about the DfE's data collection requirements and how your information is handled, please visit:
👉 https://www.gov.uk/education/data-collection-and-censuses-for-schools

👉 https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data
To contact the Department for Education, visit:
👉 https://www.gov.uk/contact-dfe

Your rights under Data Protection Law

Under the UK General Data Protection Regulation (UK GDPR), you have the following rights in relation to your personal data:

- **Right to be informed** – You have the right to know how your data is collected, used, shared, and stored. This privacy notice provides that information.
- **Right of access** – You can ask to see the personal data we hold about you and understand how we use it. This is known as a **Subject Access Request**.
- **Right to rectification** – You can ask us to correct any information you believe is inaccurate or incomplete.
- **Right to erasure** – In certain cases, you can ask for your data to be deleted (e.g. if it's no longer needed or was used unlawfully). This may not apply where we are required to keep it by law.
- **Right to restrict processing** – You can request that we limit how we use your data in certain circumstances, such as while we check accuracy or consider an objection.
- **Right to data portability** – If you've provided data to us and it's used with your consent or to carry out a contract, you can ask to receive it in a format that can be reused or transferred to another provider.
- **Right to object** – You can object to us using your data where we rely on legitimate interests or public task, unless we have compelling reasons to continue.
- **Rights related to automated decision-making** – You have rights to safeguard against decisions made without human involvement where they have legal or significant effects. This does not currently apply to our use of data.

To exercise any of these rights or to find out more, please contact the Data Protection Officer (DPO) using the details at the end of this notice. We aim to respond within one month.
If you're unhappy with how we've handled your data, you can also contact the Information Commissioner's Office (ICO) at www.ico.org.uk.

Further information

If you would like to discuss anything in this privacy notice, please contact the Data Protection Officer as detailed below:
Mr Berry (DPO)
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