

'They will soar on wings like eagles ...'
Isaiah 40:31

collaborate | enrich | trust | innovate | aspire | nurture



Multi Academy Trust Policy

Common Trust Policy, Use as Published

Privacy notice for the school workforce

Date adopted by Trust Board: 23/05/2018

Date of Review: March 2026

Date of next Review: March 2028

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This privacy notice explains how Aquila, The Diocese of Canterbury Academies Trust collects, stores and uses personal information about individuals we employ or otherwise engage to work within our schools. Under UK data protection law (UK GDPR and the Data Protection Act 2018) individuals have the right to be informed about how their personal data is used.

1. Who We Are

Aquila, The Diocese of Canterbury Academies Trust is the data controller for personal information processed by schools within the Trust.

The Trust is registered with the Information Commissioner's Office (ICO) as a data controller.

Aquila, The Diocese of Canterbury Academies Trust
Suites 19 & 20 Motis Business Centre
Cheriton High Street
Folkestone
Kent CT19 4QJ

The Trust has appointed a Data Protection Officer (DPO) who oversees compliance with data protection legislation.

Data Protection Officer

Tracey Howard

Email: DPO@aquilatrust.co.uk

Telephone: 01303 905103

Individual schools within the Trust also have a Data Protection Representative who manages day-to-day data protection matters locally.

2. The Personal Data We Hold

We collect and hold personal information about employees and workers in order to manage employment and fulfil our legal responsibilities.

This may include:

Personal details

- Name
- Address
- Date of birth
- Contact details
- Emergency contact information

Employment information

- Job title and role
- Employment history and qualifications
- Professional memberships
- Training and development records
- Performance management and appraisal records

Payroll and financial information

- Salary and benefits information
- Bank account details
- National Insurance number
- Tax and pension information

Recruitment information

- Application forms
- CVs and references
- Right to work documentation

- Interview notes

Safeguarding checks

- Disclosure and Barring Service (DBS) information
- Section 128 checks (where applicable)

Absence and wellbeing information

- Sickness records
- Occupational health reports
- Return-to-work documentation

Images and recordings

- Photographs
- CCTV images captured on school premises

3. Why We Use This Data

We use workforce data in order to:

- support recruitment and safe hiring practices
- pay staff and manage employment contracts
- administer pensions and benefits
- support performance management and professional development
- ensure safeguarding and child protection compliance
- manage absence and wellbeing
- enable workforce planning and financial management
- meet legal and regulatory requirements

We may also use anonymised workforce data for research and planning purposes.

4. Our Lawful Basis for Using This Data

We only process personal data where the law allows us to.

Most commonly we rely on:

- Contract – where processing is necessary for employment contracts
- Legal obligation – where processing is required by law
- Public task – where processing is necessary for providing education and safeguarding pupils

Relevant legislation includes:

- UK GDPR and Data Protection Act 2018
- Education Act 1996
- Education Act 2005
- Safeguarding Vulnerable Groups Act 2006

Special Category Data

Some workforce data is considered more sensitive and includes:

- health information
- disability information
- ethnicity data

We process this data only where permitted under UK data protection law, including for:

- employment law obligations
- safeguarding
- equality monitoring
- occupational health purposes

5. Collecting This Data

Most workforce data is collected directly from staff during recruitment or employment.

We may also receive information from:

- referees

- previous employers
- the Disclosure and Barring Service (DBS)
- the Department for Education
- local authorities
- professional bodies

Some information must be provided so the Trust can meet legal and safeguarding requirements.

6. How We Store This Data

Personal information is stored securely in accordance with the Aquila Data Retention Policy. Staff records are generally retained during employment and for a defined period after employment ends in line with national records management guidance.

We have security measures in place to prevent personal data from being:

- accidentally lost
- accessed without authorisation
- altered or disclosed improperly

When information is no longer required it is securely deleted or destroyed.

7. Who We Share Data With

We do not share workforce data unless it is necessary and lawful.

We may share personal data with:

Government departments

Including the Department for Education (DfE) as part of the School Workforce Census.

Local authorities

Including Kent County Council, where required.

Payroll and pension providers

To administer salary payments and pension contributions.

Safeguarding organisations

Including the Disclosure and Barring Service.

Professional advisers

Such as auditors, legal advisers and consultants.

Service providers

Companies providing services to the Trust including:

- HR systems
- payroll systems
- IT and cloud services
- training providers

These organisations process personal data under strict contractual agreements.

8. Your Rights

Under UK data protection law individuals have rights including:

- the right to be informed about how personal data is used
- the right to access personal data (Subject Access Request)
- the right to request correction of inaccurate data
- the right to request deletion in certain circumstances
- the right to restrict processing
- the right to object to processing
- the right to withdraw consent where applicable

9. Complaints

If you have concerns about how your personal information is used, please contact the Trust's Data Protection Officer.

You can also complain to the Information Commissioner's Office (ICO): <https://ico.org.uk/concerns>
Telephone: 0303 123 1113

10. Contact Us

If you have questions about this privacy notice or how personal data is processed, please contact:

Tracey Howard, DPO@aquilatrust.co.uk