

ACET Workforce Privacy Notice

(How we use Workforce Information)

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time.

DATE: July 2026

POLICY LEAD: Data Protection Officer

APPROVED BY: Full Board



Excellence



Equity



Empowerment

DOCUMENT CONTROL		
Policy Level	Trust	
Approved By	Trustees	
Approval Date	13 th July 2026	
This policy remains valid until it is reviewed and replaced; it does not expire by date alone. Policies are reviewed annually, or sooner if required by statutory or legislative changes, in line with best practice		
Policy Lead / Author	Data Protection Officer / N. Borrington	
Version Number	Date Issued	Updated Information
V2	July 2026	Updated to reflect latest legislative guidance, Artificial Intelligence and references to the Information Commission.

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Scope

This privacy notice has been written to inform prospective, current, and former employees, including supply and agency staff of all academies within ACET about how and why we process your personal data, including during the recruitment process.

Aston Community Education Trust is the Data Controller for the personal information processed within our academies.

The categories of workforce information that we collect, hold and share

These include:

- Personal information (such as name, employee or teacher number, national insurance number, home address)
- Contact information (including emergency contacts) etc.) Employees are responsible for ensuring that emergency contacts are aware their information may be provided to the Trust for emergency purposes.
- Contract information (such as start date, hours worked, post, roles and salary information)
- Work absence information (such as number of absences and reasons)
- Qualifications (and, where relevant, subjects taught)
- Relevant medical information (such as medication needed in an emergency)
- Payroll information (such as bank account numbers for payment transfers)
- Photographs and images captured on academy CCTV
- Information about medical or health conditions, including whether you have a disability for which the trust/ academy needs to make reasonable adjustments
- Criminal convictions data. This information may have come from other organisations including former employers, Teacher Regulation Agency, social services and the Disclosure & Barring Service.
- Protected characteristics information (such as ethnic group, gender, age, religious beliefs etc.)
- Recruitment information including right to work documentation, references, application and/or CV

Why we collect and use this information

We use workforce data to:

- enable the development of a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- enable individuals to be paid
- to contact you or others known to you, where you have provided their information, in cases where it would be reasonable to contact that individual (i.e. an emergency)
- process the workforce census as required under the Education Act 1996

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- enable the development of a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- enable individuals to be paid
- to contact you or others known to you, where you have provided their information, in cases where it would be reasonable to contact that individual (i.e. an emergency)
- facilitate safer recruitment
- support effective performance management
- allow better financial modelling and planning
- support the management of absence

- photographic images for identification purposes (safeguarding), and celebration purposes (to record work, classes and trust/academy events)
- to meet our statutory duties
- for site safety and security

Under the UK General Data Protection Regulation (UK GDPR), the legal basis/bases we rely on for processing personal information for general purposes are:

- Article 6(a) – Your consent. Where consent is relied upon, this will only be used where individuals have a genuine choice and can withdraw consent without detriment (for any processing which does not fall into the bases detailed within this section below)
- Article 6(b) Contract (your contract of employment) e.g. payroll
- Article 6(c) – Compliance and with our legal obligations e.g. DBS checks
- Article 6(e) – Carrying out tasks in the public Interest
- Article 6(f) – For legitimate interests (as this generally relates to commercial practices)

For special category data, we also rely on the following conditions under Article 9 of the UK GDPR:

- your explicit consent
- for compliance with certain legal obligations for exercising certain legal rights
- for protecting a person's vital interests in an emergency
- for health and public health reasons
- or for carrying out tasks that are in the substantial public interest including for safeguarding purposes.

This notice also reflects our obligations under the Data (Use and Access) Act 2025.

Collecting workforce information

We collect this information in a variety of ways. For example;

- Application forms and other recruitment documentation
- Passport or other identity documents such as your driving licence
- Forms completed by you at the start of, or during, employment
- From correspondence with you, or through interviews, meetings or other assessments
- Self-certification forms and medical fit notes
- Images provided by individuals or taken using school photographic equipment
- Previous employers

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 UK GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us and your rights in relation to this.

Storing workforce data

We store workforce information securely on the School's IT network. Aston Community Education Trust (ACET) store data either on school owned servers or hosted in Microsoft Office 365. Secure storage is provided for paper-based records. We only keep the information for the length of time we need it for, as shown in our data retention schedule. For more information on our data retention schedule, please visit www.astoncetrust.org. We dispose of personal information securely when we no longer need it. Retention periods vary depending on the type of record and legal requirements.

Some of our service providers may process personal data outside the United Kingdom. Where this occurs, we ensure appropriate safeguards are in place in accordance with UK GDPR, including International Data Transfer Agreements or adequacy regulations

Who we share workforce information with:

- Our local authority (where applicable)
- HMRC, DWP and other government departments
- Pension providers etc.
- The Department for Education (DfE)
- Within Aston Community Education Trust (ACET)
- Prospective future employers, landlords, letting agents or mortgage brokers, where you have asked them to contact us for a reference
- Disclosure and Barring Service
- Professional bodies (e.g. Teacher Regulation Agency, trade unions)
- Third Party IT systems used by the trust/academies to carry out day to day processes and requirements. For example, and not limited to; My New Term, CPOMS, SIMS, Access Education
- Our suppliers and advisors, including insurers, auditors, lawyers, consultants, accountant and payroll provider.
- Official bodies, if required (such as Police, courts, tribunals etc.)

Why we share workforce information

We do not share information about our workforce members with anyone without consent unless the law and our policies allow us to do so.

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

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>

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: datacontroller@astoncetrust.org

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. In responding to your request, the Trust will conduct a search that is reasonable and proportionate to the scope and nature of the information requested. Where we require further clarification from you about the scope of your request, we may pause the response period until that clarification is received.
- 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 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 have the right to object, but you have the right to withdraw consent.

If you have a concern about how we use your personal data, you have the right to raise a formal complaint with us.

You can do this by emailing contactus@astoncetrust.org, or writing to the Trust DPO at ACET House, 66 Holderness Drive, Aston, Sheffield, S26 2BH. We will acknowledge your complaint within 30 days and respond without undue delay. If you remain dissatisfied, you may contact the Information Commission at www.ico.org.uk or 0303 123 1113.

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; datacontroller@astoncetrust.org

Contact

If you would like to discuss anything in this privacy notice, please contact:
datacontroller@astoncetrust.org