

January 2026

Next Review date: January 2028

Privacy Notice

Staff

This privacy notice applies to all academies managed by Wootton Academy Trust (WAT).



**Wootton
Academy Trust**

Person responsible: Chief Finance and Operating Officer

Reviewed by: Executive Headteacher

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Overview

Under UK data protection law individuals have a right to be informed about how the Trust uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our Trust.

We, Wootton Academy Trust, are the 'data controller' for the purposes of data protection law within our schools. Our schools currently include Wootton Academy and Kimberley Sixth Form College.

Our Data Protection Officer is the Chief Finance and Operating Officer for Wootton Academy Trust.

The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our Trust. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of identification documents, such as driving license, passport, or utility bill
- Photographs
- CCTV footage
- Data about your use of the school's information and communications system

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Biometric data, such as finger prints
- Criminal data, provided as part of our recruitment process application
- Health, including any medical conditions, and sickness records

Why we use this data

The purpose of processing this data is to help us run the Trust, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body

- Carry out research
- Assess the quality of our services

Our legal basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)
- We have legitimate interests in processing the data

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the Trust's use of your data.

Change of Purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Collecting this information

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

How we store this data

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our Record Management and Retention Policy.

Data Sharing

We do not share information about you with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required or necessary (and it complies with data protection law) we may share personal information about you with:

- Our local authority to meet our legal obligations to share certain information, such as safeguarding concerns
- The Department of Education on a statutory basis. This data underpins workforce policy monitoring, evaluation, and links to school funding / expenditure and the assessment of educational attainment.
- Your family or representatives in the event of an emergency
- Educators and examining boards
- Our regulator, Ofsted
- Suppliers and service providers to enable them to provide the service we have contracted them for such as payroll, HR support, occupational health
- Central and local government to meet our statutory obligations
- Our auditors
- Trade Unions and associations
- Health & Social welfare organisations to ensure the well-being and safety of individuals
- Professional advisers and consultants, including training organisations
- Charities and voluntary organisations
- Police forces, courts and tribunals to fulfil our legal obligations
- Professional bodies
- Employment and recruitment agencies, requesting references for example

Transferring Data Internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with UK data protection law.

Your Rights

You have a right to make a 'subject access request' to gain access to personal information that the Trust holds about you.

If you make a subject access request, and if we do hold information about you or your child, we will:

- Give you a description of it.
- Tell you why we are holding and processing it, and how long we will keep it for.
- Explain where we got it from, if not from you or your child.
- Tell you who it has been, or will be, shared with.
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this.
- Give you a copy of the information in an intelligible form.

You may also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please contact the Trust's Data Protection Officer, using the contact details below.

Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress.
- Prevent it being used to send direct marketing.
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing.

To exercise any of these rights, please contact our Data Protection Officer using the contact details below.

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance. To make a complaint, please follow our complaints procedure.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact Us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer:

- Mr M Mieczkowski, Data Protection Officer, Wootton Academy Trust, Hall End Road, Wootton, Bedford MK43 9HT
- Email: dpo@wootton.beds.sch.uk

This notice is based on the Department for Education's model privacy notice amended to reflect the way we use data in the Trust.