

Privacy Notice - how we use workforce information

Under UK data protection law, individuals have a right to be informed about how our Trust and its schools use 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.

For the purposes of UK data protection law, Leading Edge Academies Partnership is the 'data controller'. We are registered as a Data Controller with the ICO: Ref Z2727836.

The Data Protection Officer for Leading Edge Academies Partnership is David Teasdale (Tel: 01736 688442, Email: dteasdale@leadingedgeacademies.org).

Each school in the Trust also has an Information Management Lead to maintain local oversight and compliance. The Information Management Lead for Mounts Bay Academy is Phil Lane (01736 363240 and plane@mountsbayacademy.org).

This privacy notice explains how we collect, store and use personal data about the workforce in our Trust and its schools.

The categories of workforce information that we process include:

- personal information and contact details (such as name, address, employee or teacher number, date of birth, marital status)
- bank account details, payroll records, national insurance number and tax status information
- salary, annual leave, pension and benefits information
- characteristics information (such as, sex, age, ethnic group)
- 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 employment records, including work history, job titles, training records and professional memberships
- recruitment information, including copies of right to work documentation, ID (e.g. passport, driving licence), references, and other information included in a CV or cover letter or as part of the application process
- performance information
- outcomes of any disciplinary and/or grievance procedures
- information about your use of our information and communications systems, equipment and facilities (e.g. school computers)
- information about any health conditions you have that we need to be aware of
- photographs and CCTV images captured in school
- information about trade union membership

We may also hold data about you that we have received from other organisations, including other schools and local authorities, and the Disclosure and Barring Service in respect of criminal offence data.

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

Why we collect and use workforce information

We collect and use workforce information for the following purposes:

- enable you to be paid

- check your entitlement to work in the UK
- determine the terms on which you work for us
- 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 equalities monitoring
- improve the management of workforce data across the sector
- support the work of the School Teachers' Review Body
- make sure our information and communications systems, equipment and facilities (e.g. Trust/school computers) are used appropriately, legally and safely
- ascertain your fitness to work
- manage sickness absence
- ensure the health and safety of our workforce and workplaces
- to comply with the law regarding data sharing

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for any other 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 explain the legal basis that allows us to do so.

Please note that 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.

Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts by contacting us (see 'Contact us' below).

Use of your personal data for filtering and monitoring purposes

We monitor staff use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so we can:

- Comply with health and safety, and other legal obligations
- Comply with our policies (e.g. child protection policy, IT acceptable use policy) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)
- Protect pupil and staff welfare

Our lawful basis for using this data

We only collect and use the personal data of members of our workforce when the law allows us to. Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- **Consent (Article 6(1)(a))** – we have permission from you to process the personal data. You do have the right to withdraw your consent at any time.
- **Contract (Article 6(1)(b))** – we collect and process personal data necessary for the performance of a contract.

- **Legal Obligation (Article 6(1)(c))** – we collect and process personal data so we can comply with the law.
- **Vital Interests (Article 6(1)(d))** – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk.
- **Public Task (Article 6(1)(e))** – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours.
- **Legitimate Interest (Article 6(1)(f))** – for the purposes of our legitimate interest (such as ensuring the effective operation and administration of the school)

Where we are required to collect special category data, we will use the following lawful bases of the UK GDPR which permits us to process special category data:

- **Explicit Consent (Article 9(2)(a))** – we may request explicit consent from individuals to process special category data for specific purposes, such as, using biometric information to identify individuals to school IT systems
- **Employment, Social Security, and Social Protection (Article 9(2)(b))** – we may process special category data necessary for fulfilling obligations in the fields of employment law, social security, or social protection, such as medical conditions, allergies, or disabilities, to comply with laws that require them to ensure a safe environment.
- **Vital Interests (Article 9(2)(c))** – in situations where processing is essential to protect someone's life, such as during a medical emergency, schools may process special category data without prior consent.
- **Made public by the data subject (Article 9(2)(e))** – to process special category data if that data has been manifestly made public by the data subject.
- **Legal claims (Article 9(2)(f))** – where the processing is for the purposes of establishing, exercising, or defending legal claims or by courts when they are acting in their judicial capacity.
- **Substantial Public Interest (Article 9(2)(g))** – we often process special category data in the public interest, for instance, to comply with equality legislation, ensure diversity and inclusion, or meet safeguarding obligations.
- **Provision of Health or Social Care (Article 9(2)(h))** – we may collect health-related data to support your fitness to work or manage disability accommodations.
- **Archiving, Research, or Statistical Purposes (Article 9(2)(j))** – we may process special category data for academic research, statistical purposes, or archiving in the public interest, provided that appropriate safeguards are in place.

Some of the reasons listed above for collecting and using personal data overlap, and there may be several grounds which justify our use of this 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 would go about withdrawing consent if you wish to do so.

Collecting workforce information

Collecting workforce data is essential for the safe and effective operation of the Trust and its schools. Whilst the majority of information you provide to us is compulsory, we do request some on a voluntary basis. In order to comply with data protection legislation, we will inform you at the point of collection whether you are required to provide certain information to us or if you have a choice in this.

Most of the personal information we process is provided to us by you for one of the following reasons:

- You have applied for a role at the Trust or one of its schools
- You have entered into a contract of employment with the Trust

Most of the data we hold about you will come from you, but we may also receive personal information indirectly, for example from:

- Local authorities
- Government departments or agencies
- Police forces, courts or tribunals
- Other schools or Trusts

Storing workforce information

We keep personal information about you while you work at our Trust or one of its schools. We may also keep it beyond your employment if this is necessary to comply with our legal obligations or to meet our regulatory requirements.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your data securely when we no longer have a legal requirement to retain it.

Who we share your information with

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 UK data protection law), we may share personal information about you with:

- Trust/school staff
- The Local Authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Government department or agencies, including the Department for Education
- Suppliers and service providers, to enable them to provide the service we have contracted them for
- Financial organisations
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

When we use suppliers and service providers to process information, we ask them to demonstrate compliance with our security requirements, adhere to any instructions we give them and comply with relevant data protection legislation. We have contractual agreements with these organisations which clearly define their obligations about what information they hold.

Local authority

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.

Department for Education (DfE)

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our school employees with the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

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>.

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

All data is transferred securely and held by the Department for Education (DfE) under a combination of software and hardware controls which meet the current [government security policy framework](#).

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 privacy information on the data the Department for Education (DfE) collects and uses, please see: <https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers>.

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>

Requesting access to your personal data

UK data protection law gives you certain rights about how your information is collected and used. You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

For more information, see the Trust's [Data Protection Policy](#).

To make a request for your personal information, contact the school's Information Management Lead.

Your other rights regarding your data

Under UK data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- be informed about the collection and use of your personal data – this is called 'right to be informed'.
- ask us for copies of your personal information we have about you – this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request.
- ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- ask us to delete your personal information – this is called 'right to erasure'.
- ask us to stop using your information – this is called 'right to restriction of processing'.
- object to the processing of your data in certain circumstances - the 'right to object to processing'.
- object to and challenge the use of your data for decisions being taken by automated means (by a computer or machine, rather than by a person).
- withdraw consent at any time (where relevant).
- complain to the Information Commissioner 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 the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at [raise a concern with ICO](#).

Contact us

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

- The Information Management Lead for Mounts Bay Academy is Phil Lane (01736 363240 and plane@mountsbayacademy.org) or
- The Trust's Data Protection Officer: David Teasdale (Tel: 01736 688442, Email: dteasdale@leadingedgeacademies.org).

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 concerns about our data processing, please raise this with us in the first instance using the contact details above.

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

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

Last updated

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated in September 2025.