



Privacy Notice (How we use workforce information)

Under UK data protection law, individuals have a right to be informed about how our trust and schools 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 in our trust.

The Agape Multi Academy Trust, C/O The Piggott School, Twyford Road, Wargrave, Berkshire, RG10 8DS (telephone: 01189 402357), is the 'data controller' for the purposes of UK data protection law.

The categories of school information that we process

These include:

- personal information (such as name, employee or teacher number, bank account details, national insurance number and contact details)
- characteristics information (such as gender, age, date of birth, marital status and gender)
- contract information (such as start date, hours worked, post, roles and salary information)
- recruitment information, including copies of right to work documentation, references and other information included in the application form
- qualifications and employment records, including work history, working hours, training records and professional memberships
- copy of driving licence (if driving the school's minibus)
- work absence information (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught)
- information relevant to the School Workforce Census
- details of your emergency contact
- Payroll information including tax status, annual leave, pensions and benefits information
- information relating to performance of paid staff
- declarations about suitability to work relating to the Childcare (Disqualification) regulations
- videos, audio and/or digital recordings (for presentations to staff/pupil/parent body/trustees/governors)
- documents created as a result of any disciplinary, capability, complaint and grievance procedures
- car registration details
- information about your use of our information and communications systems, equipment and facilities (e.g. school computers)

We may also collect, use, store and share (when appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Information about any health conditions you have that we need to be aware of
- Relevant medical information and sickness records
- Ethnic group

Agape MAT document: This is a Trust document which means it must be followed by all schools in Agape MAT.

- Photographs and CCTV images captured in school/on site
- Information about trade union membership

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

Why we collect and use workforce 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
- carry out staff appraisals
- to keep you and everyone at the school safe and secure
- to ensure we treat everyone equally and fairly
- to comply with employment law and our employment policies
- to carry out employment checks such as the right to work in the UK
- to allow better financial modelling and planning
- to provide curricular or pastoral information to our staff, parent and/or pupil bodies, trustees or governors
- to manage sickness absence
- to comply with health and safety and other legal obligations
- to comply with our policies (e.g. child protection and safeguarding policy, IT acceptable use policy) and our legal obligations
- to keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)
- Determine the terms on which you work for us
- Support effective performance management
- Enable equalities monitoring
- Ascertaining your fitness to work
- For external inspections (Ofsted & SIAMS for example)

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 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 explain the legal basis which 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 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 at any time by contacting us (see 'Contact us' below).

Use of your personal data in automated decision-making and profiling

We do not process any staff members' personal data through automated decision-making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

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

- for the purposes of c, d, e, f, g, h, l, m, q & r processing is necessary for compliance with a legal obligation to which the controller is subject (Article 6 – 1 (c)) ;
- For the purposes of e processing is necessary in order to protect the vital interests of the data subject or of another natural person (Article 6 – 1 (d)) ;
- For the purposes of a to k, m, n, q, r and s inclusive processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Article 6 - 1(e));
- For the purposes of a – l, o, p inclusive processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child (Article 6 1 (f)).

For special category data we use it to:

- a. enable the development of a comprehensive picture of the workforce and how it is deployed
- b. inform the development of recruitment and retention policies
- c. to keep you and everyone at the school safe and secure
- d. to ensure we treat everyone equally and fairly
- e. ascertain your fitness to work
- f. to comply with employment law and our employment policies

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

- the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, (Article 9 (2) (a)) UK GDPR - Article 9 or;
- processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law (Article 9 (2) (b)) (A, B, E, F above); or
- Article 9 – 2g reasons of substantial public interest (with a basis in law). Under Schedule 1 of the DPA 2018 we rely on:
 - Ground 8 – equality of opportunity and/or treatment (D above)
 - Ground 10 – preventing or detecting unlawful acts (C above)
 - Ground 16 – support for individuals with a particular disability or medical condition (C, E above)
 - Ground 18 – safeguarding of children or individuals at risk (C, F above)

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way

- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

Collecting workforce information

We collect personal information via you, application forms and documents completed as part of absence management/appraisal processes.

Staff members' personal data may be obtained and processed from third parties where the law requires the trust/school, to do so. The categories of data obtained and processed from third parties include:

- Recruitment agencies
- Previous or current employers (references)
- Teacher Pensions
- Berkshire Pensions
- Department for Work and Pensions
- HMRC
- HM Courts and Tribunal Service
- Local Authorities
- Government Departments or agencies
- Police forces
- Department for Education
- Disclosure and barring service

Workforce data is essential for the Trust's operational use. 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 or if you have a choice in this.

Storing workforce information

We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please visit our trust website or the websites of the schools within our trust.

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 personal data securely when we no longer have a legal requirement to retain it.

Who and why we share workforce information with

We do not share information about our workforce members with anyone 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.

We may share this information with:

- our local authority (where applicable)
- the Department for Education (DfE) or other government agencies
- our payroll provider
- our HR provider
- our Auditors
- occupational health provider
- within the Agape MAT
- other educational establishments/businesses (references only)
- police forces, courts or tribunals
- Disclosure & Barring Service
- Department for Work and Pensions
- pension providers
- HMRC
- Our regulator (Ofsted)
- SIAMS inspectors

Transferring data internationally

We may share personal information about you with the following international third parties, where different data protection legislation applies:

- Other schools or educational establishments
- Government Departments or agencies
- Security organisations

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact:

dpo@agapetrust.co.uk (Employees who work predominantly for the Agape Multi-Academy Trust)

dpo@altwoodschool.co.uk (Employees who work at Altwood Church of England School)

dpo@piggottschool.org (Employees who work at The Piggott School)

DPO@robertpiggott.wokingham.sch.uk (Employees who work at Robert Piggott Federation)

admin@shinfield-st-marys.wokingham.sch.uk (Employees who work at Shinfield St. Mary's CE Junior School)

You also have the right to:

- Object to our use of your personal data where it is likely to cause, or is causing damage or distress
- Prevent your data being used to send direct marketing
- In certain circumstances, have inaccurate personal data corrected

- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office if you feel we have not used your information in the right way
- Claim compensation for damages caused by a breach of the data protection regulations

We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

- Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task
- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests
- Right to object to use of your private data doesn't 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

See information on the types of lawful basis on page 4 of this privacy notice.

To exercise any of these rights, please contact us (see 'Contact us' below).

Withdrawal of consent and the right to lodge a complaint

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/> (Telephone: 0303 123 1113. Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF).

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 your relevant DPO (contact details are on Page 6)

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 June 2026.

Contact

If you would like to discuss anything in this privacy notice, please contact your relevant DPO (contact details are on page 6).