Privacy Notice for School Workforce 2025-26

Who we are:

We are St Catherine's CE Primary School, Marlpool Lane, Kidderminster, DY11 5HP. We are a maintained school for children aged 4 - 11. This privacy notice written on 22/8/2024 explains how we collect, store and use personal data about our workforce. We St Catherine's CE Primary School are the 'data controller' for the purposes of the General Data Protection Regulation (GDPR) and as such we are obliged to inform you of the information we hold on you, what we use it for, who we share it with, and for how long we keep it.

The Categories of School Workforce Information that we Collect, Hold and Share

- Name, address and contact details, including email address and telephone number, date of birth and gender;
- Terms and conditions of employment;
- Details of qualifications, skills, experience and employment history, including start and end dates, with previous employers and with St Catherine's CE Primary School
- Information about remuneration, including entitlement to benefits such as pensions;
- Bank account and national insurance number details;
- Information about marital status;
- Name and contact number of emergency contacts;
- Information about nationality and entitlement to work in the UK;
- Information about criminal records (if applicable);
- Details of working patterns and attendance at work;
- Details of all periods of leave including; sickness absence, unpaid leave and extended leave, maternity/paternity/adoption/shared parental leave, dependent leave, compassionate leave, and the reasons for the leave;
- Details of any formal disciplinary or grievance procedures in which employees have been involved, including any warnings issued and related correspondence;
- Assessments of employee performance, including appraisals, performance reviews and ratings, probation reviews; performance improvement plans and related correspondence;
- Information about medical or health conditions, including whether or not employees have a disability for which St Catherine's CE Primary School needs to make reasonable adjustments;
- Information relating to employees' health and safety at work;

- Equal opportunities monitoring information including information about employees' ethnic origin, sexual orientation, and religion or belief.
- Photographs - for security purposes, school newsletters, media and promotional purposes
- CCTV images

St Catherine's CE Primary School may collect this information in a variety of ways. For example, data might be collected through application forms, obtained from passports or other identity documents such as driving licences; from forms completed by employees at the start of or during employment; from correspondence with employees; or through interviews, meetings or other assessments.

In some cases, St Catherine's CE Primary School may collect personal data about its employees from third parties, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law. In most cases, St Catherine's CE Primary School will only seek information from third parties with the prior consent of the employee(s) in question.

Why We Collect and Use This Information

St Catherine's CE Primary School needs to process personal data to enter into an employment contract with its employees and to meet its obligations under employee employment contracts. For example, St Catherine's CE Primary School needs to process employee personal data to provide an employment contract, to pay an employee in accordance with their employment contract and to administer entitlements such as pension benefits.

In some cases, St Catherine's CE Primary School needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws.

Processing employee data allows St Catherine's CE Primary School to:

- Run recruitment and promotion processes;
- Develop an overview of the school's workforce and how it is deployed.
- Maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- Enable Individuals to be paid and make PAYE and pension contributions.
- Operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- Operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- Operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- Obtain occupational health advice, to ensure that St Catherine's CE Primary School complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensures that employees are receiving the pay or other benefits to which they are entitled;

- Operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that St Catherine's CE Primary School complies with duties that employees are receiving the pay or other benefits to which they are entitled;
- Ensure effective general HR and business administration;
- Provide references on request for current or former employees;
- Respond to and defend against legal claims; and
- Fulfil any statutory reporting obligations.

Some special categories of personal data, such as information about health or medical conditions, are processed to carry out employment law obligations (such as those in relation to employees with disabilities). Where St Catherine's CE Primary School processes other special categories of personal data, such as information about ethnic origin, sexual orientation, religion or belief, this is for the purposes of equal opportunities monitoring. Data that St Catherine's CE Primary School uses for these purposes is anonymised or is collected with the express consent of employees, which can be withdrawn at any time. Employees are entirely free to decide whether to provide such data and there are no consequences of deciding against this.

3. The lawful basis on which we use this information

Our lawful basis for collecting and processing workforce information is defined in GDPR under Article 6. The following elements of the article apply:

a) Consent: where you have given St Catherine's CE Primary School clear consent to process your personal data for a specific purpose
b) Contract: the processing is necessary for a contract you have with St Catherine's CE Primary School
c) Legal obligation**:** the processing is necessary for St Catherine's CE Primary School to comply with the law.
d) Vital interests: the processing is necessary to protect someone's life.

Our lawful basis for collecting and processing workforce information is further defined under Article 9, in that some of the information we process is deemed to be sensitive, or special category data. The following elements of the article apply:

a) Where you have given your explicit consent to the processing of personal data for one or more specified purposes
b) 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.
c) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee.

Collecting Workforce Information

We collect your personal information via application forms, data collection forms.

A full breakdown of the information we collect on our workforce can be found in the school's data mapping document.

On some occasions, we process personal information on the basis of consent, for example, when we wish to take photo images for social media or school newsletters. Consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

Storing and Protecting Workforce data

St Catherine's CE Primary School will hold employee's personal data for the duration of their employment. The period for which detailed employee data is held after the end of employment is six years, and limited employment data is retained indefinitely for historical purposes.

As part of the recruitment process, data will be held for a period of 6 months for unsuccessful candidates

We have data protection policies and procedures in place, including strong organisational and technical measures, which are regularly reviewed. Further information can be found on our website.

Who We Share Workforce Information With

We will share workforce information with appropriate external agencies to meet our legal obligation or where we have sought your permission. The agencies who we routinely share workforce information with include:

- Our Local Authority
- The Department for Education (DfE) - (for further information relating to Covid-19 Testing, please refer to the Privacy Notice for Covid-19 Testing and the DfE Privacy Notice)
- HM Revenue and Customs (HMRC)
- Teachers' Pension Scheme (TPS)
- Local Government Pension Scheme (LGPS)
- HR Provider – Liberata UK
- Payroll Provider- Liberata UK
- Occupational Health Provider – Freedom & Wisdom
- Previous employers to obtain references.
- Disclosure and Barring Service
- Companies to fulfil our statutory reporting obligations.
- Health authorities
- Public Health England
- Police forces, courts, tribunals
- Professional bodies

Why we Share Workforce Information

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

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

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 children and young people with the Department for Education (DfE) for the purpose of those data collections.

School Workforce Census

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.

All data is transferred securely and held by DfE under a combination of software and hardware controls, which meet the current government security policy framework.

For more information, please see 'How Government uses your data' section.

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

Please contact our Data Protection Lead (see contact details at the end of this privacy notice) who can provide you with further details of who we share workforce information with as recorded in our data mapping document.

Failure to provide data.

Failure to provide the requested data may result in the following consequences:

- Delays or error in payment
- Delays in conducting mandatory background checks.
- Error in administering entitlements.
- Increased health and safety risk
- Inaccurate employment records
- Lack of compliance with legal obligations
- Remove the ability to conduct workforce policy monitoring, evaluations and monitor school funding/expenditure.

Requesting Access to your Personal Data and your Data Protection Rights

Under data protection legislation, employees have the right to request access to information about them that we hold, through a Subject Access Request.

We will provide information in a way that is:

- Concise
- Transparent

- Intelligible
- Easily accessible
- Uses clear and plain language.

If you would like to make a subject access request, please contact our Data Protection Lead Kris Edwards – 01562 823614

Data subjects have the following rights with regards to their personal information, as follows:

- Confirmation that their personal data is being processed.
- Access to a copy of the data
- The purpose of the data processing
- The categories of personal data concerned.
- Who the data has been, or will be, shared with
- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period.
- Where relevant, the existence of the right to request rectification, erasure or restrictions, or to object to such processing.
- The right to lodge a complaint with the ICO or another supervisory authority.
- The source of the data, if not the individual
- The safeguards provided if the data is being transferred internationally.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress.
- prevent processing for the purpose of direct marketing.
- object to decisions being taken by automated means.
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed;

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 contact our Data Protection Lead within school: Kris Edwards – 01562 823614

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 Lead.

St Catherine's CE Primary School's is registered as a Data Controller with the Information Commissioner's Office (ICO).

Our Data Protection Officer (DPO) is provided by SIPS Education Ltd. The following officers can be contacted via GDPR@sips.co.uk:

Amanda Moore
Chenille Tennant

You can also report a concern online to the Information Commissioners Office at https://ico.org.uk/concerns
Telephone Number 0303 123 1113

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF 12.

Changes to this privacy notice

This privacy notice may be updated from time to time. We encourage you to check this privacy notice on a regular basis to ensure you understand how your data will be used and to see any minor updates. If material changes are made to the privacy notice, for example, how we would like to use your personal data, we will provide a more prominent notice (for example, email notification or correspondence of privacy notice changes).