

Privacy Notice - Workforce

Document Review and Approval

Review interval: 1 Year
 Review term: Autumn Term
 Reviewed by: Data Protection Manager

First approved: September 2013
 Last approved: June 2026
 Next review: June 2027

A copy of this document and other related policies can be obtained from the School Office.

This document will be reviewed annually and sooner when significant changes are made to the law.

Contents

1. Privacy Notice (How we use your information)	2
2. The categories of school workforce information that we process	2
3. Why we collect and use workforce information.....	3
4. How we collect workforce information.....	4
5. How, where, and for how long we store workforce information	4
6. Who we share workforce information with.....	4
7. Freedom of Information Act and Environmental Information Regulations 2004	5
8. Why we share school workforce information.....	5
9. How the Government uses your data	6
10. Contacts	8

1. Privacy Notice (How we use your information)

Gildredge House collects, holds, uses, and shares information about our workforce. This is known as 'personal data' and you have rights around that data, including knowing how and why we are processing the data. 'Processing' data means collecting, storing, using, sharing and disposing of it. The school workforce includes all those employed to teach, or otherwise engaged to work, either on a paid, contracted, or voluntary basis, at the school.

For the purposes of Data Protection legislation, Gildredge House is a Data Controller and is registered as such with the Information Commissioner's Office.

2. The categories of school workforce information that we process

The categories of workforce information that we process include:

- Personal information such as name, address, employee or teacher number, national insurance number.
- Characteristics such as ethnicity, language, religion, and identity*.
- Equalities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief*.
- Contract information such as start date, hours worked, post, roles, and salary information.
- Work absence information such as number of absences and reasons, and relevant medical information*.
- Qualifications and, where relevant, subjects taught.
- Photographic and CCTV records.
- Information about medical or health conditions, including whether you have a disability for which the school needs to make reasonable adjustments*.
- Next of Kin and emergency contact details.
- Related parties'/close family members' interests where required by the Academies Accounts Direction from the Department for Education (DfE).
- Teacher reference number (TRN), if applicable.
- Recruitment information including right to work documentation, confidential references, application and/or CV.
- Checks made regarding online presence including social media searches.
- Performance information.
- Information relating to grievance and/or disciplinary procedures.
- Your use of school devices and networks as part of our safeguarding procedures.
- Biometrics (thumb print for catering services)* - more information about this can be found in our Protection of Biometric Information Policy.
- Information about any criminal convictions, offences, cautions and prohibitions. This information may have come from other organisations including former employers, Teacher Regulation Agency, social services, and the Disclosure & Barring Service.*

Items marked with an asterisk * are particularly sensitive and so are known as special category or criminal offence data. This includes data that the Department for Education (DfE) advises we treat as special category.

Some of the legal conditions for processing special category and criminal offence data require us to have an Appropriate Policy Document (APD) in place, setting out and explaining our procedures for securing compliance with the data protection principles and to have policies regarding the retention and erasure of such personal data. This document is our Special Category Data Policy and should be read alongside this Privacy Notice.

3. Why we collect and use workforce information

We use workforce information 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;
- facilitate safer recruitment, for example, by carrying out criminal records checks and requesting references;
- support effective performance management;
- allow better financial modelling and planning;
- support the management of absence;
- identify individuals for safeguarding and celebration purposes, for example, to record work, classes, and school events;
- to meet our statutory duties;
- for site safety and security;
- to protect public monies against fraud;
- to detect and prevent crime and combat fraud; and
- to streamline systems.

Under the UK General Data Protection Regulation (UK GDPR), the legal basis for processing your personal information include:

- Article 6(a) - Your consent (for any processing which does not fall into the other bases explained below).
- Article 6(b) Contract (your contract of employment).
- Article 6(c) - Compliance and with our legal obligations.
 - In particular, but not exclusively, section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.
 - Keeping Children Safe in Education (statutory guidance from the DfE issued under Section 175 of the Education Act 2002 etc).
 - Equality, and Health and Safety legislation.
 - The Academy Trust Handbook and the Academies Accounts Direction from the DfE.
- Article 6(d) - Being necessary for us to protect your, or someone else's, Vital Interests (potentially lifesaving).
- Article 6(e) - Carrying out tasks in the Public Interest.
- Article 6(f) - For legitimate Interests.

The ways we collect and use sensitive workforce information are lawful based on Articles 9 and 10 of UK GDPR. Please see our Special Category Data Policy for full details of these lawful bases for processing this data.

Where we are processing your personal data with your consent, you have the right to withdraw that consent.

3.1 Marketing Purposes

Where you have given us consent to do so, we may send you marketing information by email. You can withdraw this consent at any time by contacting the School Office.

3.2 Automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. Should this change in the future, Privacy Notices will be updated to explain both the processing and your right to object to it.

We may use our authorised Artificial Intelligence (AI) tools to help us review and analyse written information that individuals provide to us. This may include identifying themes, patterns or areas of interest within the responses we receive. The AI does not make decisions about individuals, and any analysis is always reviewed and interpreted by staff.

4. How we collect workforce information

We collect this information in a variety of ways. For example, data is collected through application forms, obtained from your passport or other identity documents such as your driving licence, from forms completed by you at the start of or during employment (such as pension benefit nomination forms), from correspondence with you, or through interviews, meetings or other assessments, self-certification forms [medical], Fit Notes, images provided by individuals or taken using school photographic equipment, local authorities, previous employers, NHS, law enforcement agencies e.g. Police, the Disclosure and Barring Service, and the DfE.

We sometimes record audio/video record lessons/assessments for student or staff development and assessment. This will generate personal data including staff images, names, contributions, and will be protected, processed, and retained in the same way as all personal data, in line with the school's Data Protection Policies and in accordance with our other policies including Acceptable Use, Off Site Working, and Bring Your Own Device Policies, as well as our Retention Schedule. Recordings in these circumstances should be carried out in line with our HR policies.

Workforce data is essential for the school's/Local Authority's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. We must inform you at the point of collection, whether you are required to provide certain information to us and your rights in relation to this.

5. How, where, and for how long we store workforce information

We store workforce information securely on the school's IT network or within secure cloud-based servers. 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 Retention Schedule.

We dispose of personal information securely when we no longer need it.

6. Who we share workforce information with

We routinely share this information with:

- Our Local Authority particularly in relation to functions related to HR, payroll, and Criminal Records checks.
- Our Governing Board.
- Our insurance provider.
- The DfE including the Teaching Regulation Agency.
- HMRC.
- The Disclosure and Barring Service.
- Employers where references are requested - we will always mark these as confidential.
- Law enforcement agencies e.g. Police.
- External systems used by the school to carry out day-to-day processes and requirements. Third parties we share your information with include: 3CX, 4Matrix, Access Evo, ActiveLearn, Cunninghams, EduCake, EduLink, Evidence Me, IRIS Financial, Medical

Tracker, Microsoft, Morrisby, MyConcern, PaperCut, ParentPay, People Development (National College), PiXL, Primary Stars, SalamanderSoft, Secure Schools, Securly, SIMs, Sign-In App, Wonde, Yodek.

Your personal information may be transferred outside the UK and the European Economic Area ('EEA'), including to the United States. Where information is transferred outside the UK or EEA to a country that is not designated as "adequate" in relation to data protection law, the information is adequately protected by the use of International Data Transfer Agreements and security measures, and other appropriate safeguards. For more information on international transfers, please contact us using the details below.

7. Freedom of Information Act and Environmental Information Regulations 2004

As a public body, our school is subject to requests made under the above legislation. Therefore, we have a legal obligation to process any personal data we hold when considering requests under these laws. For example, we may receive a request asking about numbers of staff with particular levels of professional qualification.

However, we will never disclose personal data in our responses to these requests where to do so would contravene the principles of data protection.

8. Why we share school 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.

8.1 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.

This may include, inter alia matters relating to the following:

- Payroll;
- Contracts; and/or
- Occupational Health

8.2 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 the Data Protection Manager using the details below.

You also have the right to:

- be informed about the collection and use of your personal data;
- rectification i.e. to have inaccurate personal data rectified, or completed, if it is incomplete;
- erasure, often known as the 'right to be forgotten'. However, this does not apply where, amongst other things, processing is necessary to comply with a legal obligation;
- restrict processing, although as above, this is a limited right;
- object; though other than for marketing purposes, this is also limited as above;

Where we rely on your consent to process your data, you have the right to withdraw that consent. If you do change your mind, or you are unhappy with our use of your personal data, please let us know - our contacts are at the end of this document.

You also have rights in relation to automated decision making and profiling, though these are not currently relevant.

Finally, you have the right to seek redress, either through the ICO, or through the courts.

If you make a request, we will keep a record of the request and any personal data supplied for a suitable period after its fulfilment, in order to deal with any questions that you, your representatives, or the regulators may have about it.

9. How the Government uses your data

We share personal data with the DfE on a statutory basis. We are required to share information about our school employees with the DfE under the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments. All data is transferred securely and held by the DfE under a combination of software and hardware controls which meet the current government security policy framework. For more information about the Department's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

The workforce data that we share with the DfE through data collections:

- informs departmental policy on pay and the monitoring of the effectiveness and diversity of the school workforce;
- links to school funding and expenditure; and
- supports 'longer term' research and monitoring of educational policy.

For privacy notices and further information relating to how the DfE collects, holds and uses your personal information please visit:

[Personal information charter - Department for Education - GOV.UK](#)

For all information relating to how the DfE uses your information please visit:

[Privacy information: education providers' workforce, including teachers - GOV.UK](#)

For all information related to the retention periods for data processed by the DfE, please visit:

[DfE retention schedule - GOV.UK](#)

9.1 Data collection requirements

The DfE collects and processes personal data relating to those employed by schools and Local Authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005.

To find out more about the data collection requirements placed on us by the DfE including the data that we share with them visit <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

9.2 Sharing by the DfE

The 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; and/or
- providing information, advice, or guidance.

The 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. There are stringent controls in place regarding access to it and its use. Decisions on whether the 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.

To be granted access to school workforce information, organisations will comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements, and retention and use of the data.

The DfE provides a formal process for external organisations to apply for access to certain types of personal data it holds. Depending on the nature of the request, access may be provided through the Office for National Statistics Secure Research Service (ONS SRS), the UK Data Service (UKDS), or directly by the DfE where data cannot be shared via those routes. The DfE will only share personal data when strict legal and data protection requirements are met, and in many cases, data is first de-identified by accredited processors such as the ONS or UK Data Service before being made available. Applicants must demonstrate a clear purpose, satisfy security and lawful basis requirements, and comply with the DfE's data sharing arrangements. More information about how organisations can apply for DfE held personal data, including the available routes and eligibility criteria, is available at: <https://www.gov.uk/guidance/apply-for-department-for-education-dfe-personal-data>

If you need more information about how our Local Authority and/or the DfE collect and use your information, please visit:

- our local authority at <https://www.eastsussex.gov.uk/privacy/all-privacy-notice>; or
- the DfE website at <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data> and <https://www.gov.uk/government/publications/dfe-external-data-shares>

9.3. How to find out what personal information DfE hold about you

Under the terms of the UK GDPR, you are 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 are holding it and any recipient it may be disclosed to; and
- 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, you should make a Subject Access Request (SAR). Further information on how to do this can be found within the DfE's personal information charter that is published at:

www.gov.uk/government/organisations/department-for-education/about/personal-information-charter or www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights

To contact DfE, please go to: <https://www.gov.uk/contact-dfe>

10. Contacts

If you have a concern about the way we are collecting or using your personal data or you would like to discuss anything in this Privacy Notice, we ask that you raise your concern with us in the first instance. Please contact the Data Protection Manager on dataprotection@gildredgehouse.org.uk

Alternatively, please contact the school's Data Protection Officer:

DPO: Education Data Hub (Data Protection), Derbyshire County Council

DPO Email: dpforschools@derbyshire.gov.uk

DPO Phone: 01629 532888

DPO Address: County Hall, Smedley Street, Matlock, Derbyshire, DE4 3AG

For our local authority, East Sussex County Council:

Data Protection Officer
Children's Services Department, East Sussex County Council
County Hall
St Anne's Crescent
Lewes
East Sussex
BN7 1UE

Email: <https://www.eastsussex.gov.uk/your-council/about/key-documents/foi/data-protection/data-protection-officer>

Telephone: 01273 482 304

For the DfE:

Public Communications Unit
Department for Education
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

Website: www.education.gov.uk or <https://www.gov.uk/contact-dfe>

Email: <http://www.education.gov.uk>

Telephone: 0370 000 2288

If, however, you are dissatisfied with our response to your concerns you can contact the ICO quoting our ICO registration number **ZA475498** and stating that the Data Controller is Gildredge House.

Information Commissioners' Office
Wycliffe House
Water Lane
Wilmslow
Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

Fax: 01625 524 510

Website: <https://ico.org.uk/concerns/>