St Hugh's School

Privacy notice for staff

Privacy Notice (How we use workforce information)

Under UK data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy 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 school.

We, St Hugh's School, are the 'data controller' for the purposes of UK data protection law.

Our data protection officer(s) are the School's Business Manager (see 'Contact us' below).

The categories of school information that we process

These include:

- personal information (such as name, employee or teacher number, national insurance number)
- 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, where relevant, subjects taught)

- **Next of** kin and emergency contact details
- Salary, annual leave, pension and benefits **workforce 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 an application form, 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
- Copy of driving license, passport or other identification documentation
- Data about your use of the school's information and communications system

We may also collect, 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:

- Trade union membership
- Any health conditions you have that we need to be aware of and sickness records
- Photographs and CCTV images captured within school

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences. We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data list is not exhaustive, to access the current list of categories of information please contact our DPO – Zoe Lifsey Business manager zlifsey@st-hughs.n-lincs.sch.uk

Why we collect and use workforce information

We use workforce data 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) enable individuals to be paid

a) Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
b) Support effective performance management
c) Allow better financial modelling and planning
d) Enable equalities monitoring
e) Improve the management of workforce data across the sector
f) Support the work of the School Teachers' Review Body
g) To report to the DFE
h) to contact others known to you, where you have provided this information

We do not currently process any 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:

- 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)

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

- Article 6.1.b states that the use of personal data is justified if 'processing is necessary for the performance of a contract to which the data subject is party'. For instance, there is an employment contract which includes paying salaries.
- Article 6.1.c states that the use of personal data is justified if 'processing is necessary for compliance with a legal obligation to which the controller is subject'. For instance, we have a legal obligation to process some staff data to meet DfE and Local Authority requirements.
- Article 6.1.e states that the use of personal data is justified if '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'. In this instance, the requirement for the school to deliver education under the Education Act (1996) requires us to collect information to deliver this service.
- Article 9 covers the use of sensitive personal information (this includes health and social care information). This is justified either by article 9.2.a (consent from the data subject) or article 9.2.e (processing is necessary for the purpose of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision

of health or social care or treatment or management of health or social care systems and services).

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

Collecting workforce information
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. 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. If you would like a copy of our retention schedule please contact our Business Manager (please see contact below)

We create and maintain an employment file for each staff member while you work at our school. The information contained is held on a secure database and in paper form in locked cabinets 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 Records Management Policy. Our Records Management Policy can be viewed on the school's website: www.st-hughs.n.lincs.sch.uk

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

We will dispose of your personal data securely when we no longer need it.

Who we share workforce information with

We routinely share this information with:

- our local authority (where applicable)
- the Department for Education (DfE)
- OFSTED
- Suppliers and service providers
- Our auditors
- Trade unions and associations
- Health authorities
- Security organisations
- Health and social welfare organisations – to help keep our employees safe at work
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies
- Pension providers
- Insurance Providers
- Training providers and consultants

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.

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

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.

Transferring data internationally

Where we transfer your personal data to a third-party country or territory outside, 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.

Under data protection legislation, you have the right to request access to information about our school employees to 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 the Department for Education (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.

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-providersworkforce-including-teachers.

Requesting access to your personal data

The UK-GDPR gives you certain rights about how your information is collected and used. To make a request for your personal information, contact Business Manager Zoe Lisfey (see contact below)

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.

- the right to ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request, data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to 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 haven't 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

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

Withdrawal of consent and the right to lodge a complaint

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 Business manager Zoe Lifsey (see contact below)

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 autumn 2025

Contact

If you would like to discuss anything in this privacy notice, please contact: Business Manager, Zoe Lifsey 01724 842960 zlifsey@st-hughs.n-lincs.sch.uk

How Government uses your data

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

Data collection requirements

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.

Sharing by the Department for Education (DfE)

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 more information about the Department for Education's (DfE) data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

For information about which organisations the Department for Education (DfE) has provided information, (and for which project) please visit the following website: https://www.gov.uk/government/publications/dfe-external-data-shares

How to find out what personal information the Department for Education (DfE) hold about you

Under the terms of UK GDPR, you're 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're holding it and any recipient it may be disclosed to
- 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 for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below: https://www.gov.uk/government/organisations/department-for-education/about/personal-informationcharter or https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-yourpersonal-information#your-rights

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