# All Saints' C of E Junior and Emscote Infant School

# Privacy Notice for Staff – How we use your information

# 2026/2027

**Who are we?**
Emscote Infant School & All Saints' Junior School are each the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Emscote Infant School & All Saints' Junior Schools are registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: Emscote Infant School Z6347590. All Saints' Junior School Z6599934

You can contact the school as the Data Controller in writing at:
Emscote Infant School: admin2332@welearn365.com
All Saints' C of E Junior School: admin3154@welearn365.com

**What is a Privacy Notice?**
A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our staff.

**What is Personal Information?**
Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

**What personal information do we process about staff?**
The categories of staff information that we collect, hold and share include:

- personal information such as name, gender, age, employee or teacher number and national insurance number
- special categories of data including characteristics information such as, ethnic group, trade union membership details, health information
- contract information such as start dates, hours worked, post, roles, bank details, and salary information
- work absence information such as number of absences and reasons
- qualifications and, where relevant, subjects taught
- Performance information, outcomes of any capability, disciplinary or grievance procedures.
- Copies of your right to work documents, including documents used to verify your identity.
- We may also collect, use, store, and share (when appropriate) information about criminal convictions and offences

**For what purposes do we use personal information?**

We use staff data to:

- Develop a comprehensive picture of the workforce and how it is deployed
- Inform the development of recruitment and retention policies
- Enable individuals to be paid and receive other staff benefits
- Ensure that we can act in an emergency
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Support effective performance management
- 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
- To fulfil our statutory obligations

**Collecting staff information**
Whilst the majority of staff information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the UK General Data Protection Regulations, we will inform you whether you are required to provide certain staff information to us or if you have a choice in this.

**What are the legal reasons for us to process your personal information?**

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. Data Protection law sets out the lawful reasons we have to process your personal information and these are as follows:

**1) To comply with the law**

We collect and use general purpose staff information in order to meet certain legal requirements and legal obligations placed upon the school by UK law. We therefore have the right to process your personal information for such purposes without the need to obtain your consent.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

**2) To protect someone's vital interests**

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

**3) With the consent of the individual to whom that information 'belongs'**

Whilst much of the personal information is processed in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

**4) To perform a public task**

It is a day-to-day function of the school to ensure that staff members receive the training and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that staff are properly supported and able to do their job.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

**5) To comply with a contract we have with you or because you have asked us to take specific steps before entering into a contract**

We are able to process personal information in order to comply with the contract that we have with you.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 5.

**6) We have a legitimate interest**

Occasionally we have reasons to process information which fall outside of our usual day-to-day school functions. Details of the type of processing that we may undertake on this basis are set out in Table 6.

Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

1) Explicit consent of the data subject
2) Necessary for carrying out obligations and exercising specific rights in relation to employment and social security and social protection law
3) Processing relates to personal data which is manifestly made public by the data subject
4) Necessary for establishing, exercising or defending legal claims
5) Necessary for reasons of substantial public interest
6) Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
7) Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of sensitive category personal information that we process is set out in the tables attached.

**Who might we share your information with?**
We routinely share staff information with:

- our local authority
- the Department for Education (DfE)
- Where appropriate, parents, carers and pupils.
- NHS
- Public Health and other public health agencies

We do not share information about our staff unless the law and our policies allow us to do so.

Please refer to the tables for information about what personal information is shared with which specific third parties.

**Data Collection Requirements:**

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 about the data collection requirements placed on us by the Department for Education including the data that we share with them, please go to https://www.gov.uk/education/data-collection-and-censuses-for-schools

**What do we do with your information?**
All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected. The School monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

**How long do we keep your information for?**
In retaining personal information, the school complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the Academy Trust are required to retain the information.

A copy of those schedules can be located using the following link:
http://irms.org.uk/page/SchoolsToolkit

**Transferring data internationally**
Where we transfer personal data to a country or territory outside of the UK, we will do so in accordance with data protection legislation.

**Commented [SS1]:** Added to reflect Brexit and the UK GDPR

**What are your rights with respect of your personal information?**

Under data protection law, staff members have the right to request access to information about them that we hold. To make a request for your personal information contact the School Data Protection Officer at Warwickshire Legal Services via email at schooldpo@warwickshire.gov.uk or alternatively;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council

Shire Hall
Market Square
Warwick
CV34 4RL

****Please ensure you specify which school your request relates to**.

You also have the right to:

- In certain circumstances, 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
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

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 https://ico.org.uk/concerns/

**Review**
The content of this Privacy Notice will be reviewed September 2027.

**Data Tables:**

The tables below set out the types of processing carried out by the school/Academy Trust and lawful reasons for doing do.

**Table 1** – Personal information we are required to process to comply with the law:

| **Information Type** | **Relevant legislation** | **Special Category– additional lawful reason** | **Third Parties with whom we share the information** | **Lawful reason for sharing** |
|---|---|---|---|---|
| Staff information, including personal details, N.I number, DBS checks, qualifications, verification of right to work in the U.K | Education Act 2005, Section 114 and accompanying regulations | | Secretary of State, Local Authority, Disclosure & Barring Service | Legal Obligation |
| School workforce | Education Act 2005, Section 114 and | | Department of Education | Legal Obligation |

| | | | | |
|---|---|---|---|---|
| Census including staff personal details | accompanying regulations | | | |
| School workforce Census – Staff Ethnicity | Education Act 2005, Section 114 and accompanying regulations | Necessary for reasons of substantial public interest. | Department of Education | Legal Obligation |
| Accident Records | Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 (RIDDOR) | | Health & Safety Executive, and Local Authority Health & Safety team (where necessary) | Legal Obligation |
| Individual Staff Health & Safety Risk Assessments and Personal Emergency Evacuation Plans (PEEP) | Health and Safety at Work etc Act 1974 and accompanying legislation | | Not shared externally | |
| Qualifying Complaint Information | Education Act 2005, Section 11B | | Chief Inspector | Legal Obligation |
| Verification of Right to work in the U.K (Single Central Record) | Immigration, Asylum and Nationality Act 2006, Section 15 | | Local Authority, Ofsted | Legal Obligation |

**Table 2** – Personal information we are required to process as it is necessary to protect someone's vital interests

| **Information Type** | **Special Category - additional lawful reason** | **Third Parties with whom we share the information** | **Lawful reason for sharing** |
|---|---|---|---|
| Medical Information | Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent OR<br>Necessary for preventative/ occupational medicine | Medical staff i.e. paramedics/ambulance Responsible/First aid trained staff on residential trips | Vital Interest |
| Staff Dietary Requirements (food allergies) | Necessary for preventative/ occupational medicine | Medical staff i.e. paramedics/ambulance | Vital Interest |
| Medical Conditions & | Necessary for preventative/ occupational medicine | Medical staff i.e. paramedics/ambulance | Vital Interest |

| | | | |
|---|---|---|---|
| Staff Emergency Contact Details | | Responsible/First aid trained staff on residential trips | |
| Religious belief | Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent | Medical staff i.e. paramedics/ambulance | Vital Interest |

**Table 3 -** Personal information we are required to process with the consent of the individual to whom that information 'belongs' - Please note, you have the right to withdraw your consent for us to process your data in this way at any time.

| **Information Type** | **Third Parties with whom we share the information** | **Lawful reason for sharing** |
|---|---|---|
| Photographs | Local Press/Media, Staff Medical Noticeboard, Parents & Community (Newsletter, School Website, social media platforms, Annual Prospectus, Internal school displays, staff photo board). | Consent |
| Staff Email address and mobile number | Parents, and other members of staff | Public Task |

**Table 4 -** Personal information we are required to process because it is necessary to do so in order to perform a public task. You have the right to object or restrict processing that is carried out for the purposes of Public Task – However, please note that this is not an absolute right and would only apply in certain circumstances.

| **Information Type** | **Special Category - additional lawful reason** | **Third Parties with whom we share the information** | **Lawful reason for sharing** |
|---|---|---|---|
| Attendance Records at staff meetings and staff training | | Not shared externally | Public Task |
| Staff personal characteristics i.e Religion/Gender/Ethnicity | Necessary for reasons of substantial public interest | Local Authority – Confidential Recruitment Monitoring, Diocesan Education Service annual census | Public Task & Statistical Purposes |
| Medical Conditions (including allergies) | Necessary for preventive or | Medical staff i.e. paramedics/ambulance, | Vital Interests |

| | | | |
|---|---|---|---|
| | occupationa l medicine. | | |
| Information relating to Trade Union Membership where there is industrial action that may impact the function of the school including class and/or school closures. | Article 9 (2) (b) *Employment and social security and social protection law* | Parents, Governors and other members of staff | Public Task |

**Table 5** - Personal information we are required to process because of a contract we have with you or because you have asked us to take specific steps before entering into a contract

| **Information Type** | **Third Parties with whom we share the information** | **Lawful reason for sharing** |
|---|---|---|
| Recruitment Information – Application forms, interview notes, Medical questionnaires & references | Local Authority & Ofsted | Public Task / Legal Obligation |
| Absence Records (including number of absences, reasons for absence & self-certifications forms) | Local Authority – HR & Payroll Team | Public Task |
| Disciplinary action taken | Local Authority – HR advisory team where relevant | Public Task |
| Grievances | Local Authority – HR advisory team where relevant | Public Task |
| Staff Information i.e name D.O.B, address, contact details, Emergency contact details | Department of Education – school workforce census. | Legal Obligation |
| P45 Forms | Local Authority – HR & Payroll team | Public Task |
| Consent Forms i.e UK GDPR, Policy Agreement | Not shared externally | |
| Staff personal bank details | Local Authority requirement for Payroll System | Contract |
| Appraisal Records, appraisal notes, feedback from colleagues, objectives, updated job descriptions, pay & promotion recommendations | Not shared externally | |
| Staff information, including personal details, N.I number, DBS, Address, Phone number. | Secretary of State, Local Authority, Disclosure & Barring Service, | Legal Obligation |

**Table 6 - Personal information we process because we have a legitimate interest.** Please note that the right to object will apply to *some* of this processing, please see the section above that refers to '*What are your rights with respect of your personal information?'*

| Information Type | Special Category - additional lawful reason | Third Parties with whom we share the information | Lawful reason for sharing |
|---|---|---|---|
| Images captured on our CCTV system | n/a | This is not shared routinely | n/a |