Privacy Notice for Staff
How we use your information

2026/27

Who are we?
Radford Semele C of E Primary School is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Radford Semele C of E Primary School is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: **ZA 365273**

You can contact the school as the Data Controller in writing at:

Radford Semele C of E Primary
School Lane
Radford Semele
Leamington Spa
CV31 1TQ

or admin3152@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, address, emergency contact information, employee or teacher number and national insurance number;
- special categories of data including characteristics information such as gender, age, ethnic group, trade union membership, medical information;
- contract information such as start dates, hours worked, post, roles 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 right to work documentation, including documents used to verify your identify;
- we may also collect, use, store and share (where appropriate) information about criminal convictions and offences.

This list is not exhaustive, but provides an example of the types of data we store and process in relation to our employees. We may process other data as necessary for the purposes of facilitating the contractual relationship between the school and our staff.

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 equality of opportunity monitoring;
- improve the management of workforce data;
- 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 General Data Protection Regulation, 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. For staff the contract is the individual contract of employment that it is in place with each staff member.

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 types 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 additional 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) vital interests;
4) not for profit bodies;
5) processing relates to personal data which is manifestly made public by the data subject;
6) necessary for establishing, exercising or defending legal claims;
7) necessary for reasons of substantial public interest, with a basis in law;
8) necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health, with a basis in law;
9) necessary for archiving, historical research or statistical purposes, with a basis in law.

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

Collecting information
We collect personal information during the recruitment process and periodically during employment.

Information about staff is essential for the school's operational use. Whilst the majority of personal information provided by staff to school is mandatory, some of it is requested on a voluntary basis. In order to comply with UK GDPR, we will inform staff at the point of collection of information whether they are required to provide the information or if it is a request for voluntary information only.

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

- our Local Authority – we are required to share information about our workforce with the Local Authority under Section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments;
- the Department for Education (DfE) – the DfE collects personal data from educational settings and Local Authorities via various statutory data collections. The school is required to share information about employees under Section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments;
- our HR provider;
- where appropriate, parents, carers and pupils.

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 schools with the DfE under Section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

How Government uses the personal data of school staff
The workforce data that is lawfully shared with the DfE through data collections:

- informed the 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.

To find out more about the data collection requirements placed on the school by the DfE including the data that school shares with them go to:
https://www.gov.uk/education/data-collection-and-censuses-for-schools

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;
- providing information, advice or guidance.

The DfE 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 DfE releases personal data to a third party are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data;
- the purpose for which the data is required;
- the level and sensitivity of the data requested;
- the arrangements in place to securely store and handle the data.

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

Under the terms of the Data Protection Act 2018, staff members are entitled to ask the 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 the personal data stored and any details of the source of the personal data.

If a member of staff would like to see the personal data held about them by the DfE, they should make a 'Subject Access Request'. Further information about how to do this can be found in the DfE's personal information charter that us published at:

https://www.gov.uk/government/organisations/deparment-for-education/about/personal-information-charter

The DfE can be contacted at: https://www.gov.uk/contact-dfe

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 school 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 the European Economic Area, we will do so in accordance with data protection law.

What are your rights with respect of your personal information?
Under data protection legislation, 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 the processing of personal data for the purposes 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;
- restrict our processing of personal data, for example, permitting its storage, but no further processing;
- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed;
- claim compensation for damages caused by a breach of the Data Protection regulations; and
- subject to the complaints procedure below, you have the right to complain to the ICO.

Withdrawal of consent
Where the school is processing staff personal data with their consent, staff members have the right to withdraw that consent. If a member of staff changes their mind about giving consent for the processing of their personal data, they should contact us at admin3152@welearn365.com.

Data protection complaints
We are committed to handling your personal data in a way that is fair, transparent and in accordance with the law. If you are unhappy with how we have handled your personal data, this process outlines how you can make a complaint.

How to make a complaint
If you have a complaint about how your personal data has been handled, please contact our Data Protection Lead or our Data Protection Officer. This allows us to investigate and resolve the issues as quickly as possible.

If you wish to make a complaint you should contact us at:
Radford Semele C of E Primary
School Lane
Radford Semele
Leamington Spa

CV31 1TQ

or admin3152@welearn365.com

Ensuring any correspondence is marked FAO the Data Protection Lead.

The school's Data Protection Officer can be contacted at: schooldpo@warwickshire.gov.uk.

If you contact us, please provide as much information as possible about your complaint. This will help us to understand the issue and investigate it thoroughly.

What to expect from us
We will acknowledge receipt of your complaint within 30 days. We will, without undue delay, take appropriate steps to respond to your complaint, including making appropriate enquiries.

Throughout the process, we will:

- keep you informed of our progress;
- request any additional information needed from you in a timey and proportionate manner;
- provide you with a clear and comprehensive outcome of our investigation.

If you remain unhappy
If you are not satisfied with the outcome of your complaint, or if you feel it has not been handled appropriately, you have the right to complain to the Information Commissioner's Office (ICO). The ICO is the UK's independent regulator for data protection and information rights.

For more information about the ICO and their complaints process, you can visit their website at www.ico.org.uk.

Contact
If any member of staff would like to discuss anything contained in this Privacy Notice for Staff, please email admin3152@welearn365.com.

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

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, Warwickshire County Council, Disclosure & Barring Service	Legal Obligation
School Workforce Census including staff personal details	Education Act 2005, Section 114 and accompanying regulations		Department of Education	Legal Obligation
School Workforce Census – Staff Ethnicity	Education Act 2005, Section 114 and accompanying regulations	Consent	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 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 & Staff Emergency Contact Details	Necessary for preventative/ occupational medicine	Medical staff i.e. paramedics/ambulance Responsible/First aid trained staff on residential trips	Vital Interest
Religious Belief	Necessary to protect vital interests of the data subject or another person where the data subject is	Medical staff i.e. paramedics/ambulance	Vital Interest

	physically or legally incapable of giving consent		

Table 3 - Personal information we are required to process with the **consent** of the individual to whom that information 'belongs'

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, Twitter, 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**

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	Consent	Local Authority – Confidential Recruitment Monitoring, Diocesan Education Service annual census	Public Task & Statistical Purposes
Medical Conditions (including allergies)	Necessary for preventive or occupational medicine.	Medical staff i.e. paramedics/ambulance,	Vital Interests
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 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	WCC Team Prevent, 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, including 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. 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, Warwickshire County Council, Disclosure & Barring Service,	Legal Obligation

Table 6 - Personal information we are required to process because of 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 to your personal information?'

Information Type	Third Parties with whom we share the information	Lawful reason for sharing
We do not currently process any data that falls into this category.		