CASTLE PRIMARY SCHOOL

PRIVACY NOTICE FOR STAFF

1. How we use staff information

Data protection legislation gives staff the right to be informed about what personal data is held on them, how that data is used, who it is shared with and how long it is retained. This privacy notice provides this information, in general terms, in relation to information held on school staff, as well as the lawful bases under which it is collected and retained.

If after reading this notice you have any questions relating to the data we hold or how we use it, please contact our Data Protection Officer, whose contact details are listed in section 12 of this notice.

Castle Primary School is the Data Controller in charge of the data. The school is registered with the Information Commission's Office as a Data Controller and renews that registration annually.

2. Categories of information

The categories of personal information that we collect, hold and share include but are not limited to:

- Contact details (such as names, addresses, telephone numbers and email addresses)
- Next of kin and emergency contact information
- Personal characteristic information (such as gender and age)
- Recruitment information (such as information provided in your CV and references)
- Contract information (such as job roles, start dates, hours worked and salary information)
- Payroll information (such as bank account details and national insurance number)
- Qualifications (including, where relevant, subjects taught)
- Relevant information regarding safeguarding
- Performance information and outcomes of any disciplinary and/or grievance procedures
- Criminal conviction and offence data
- Information about your use of our IT and communications systems, including e- mail
- Photographs
- CCTV footage
- Recordings of live stream meetings or lessons (you will be advised if they are to be recorded).

Special category data (including health data & ethnic group)

In addition to the above categories of information, we may also process 'special category' personal data:

- Equal opportunities monitoring information (including information about your race or ethnicity, nationality, religion or beliefs, gender reassignment and sexual orientation)
- Information about your health, including any medical conditions, sickness records and whether you have a disability for which we need to make reasonable adjustments
- details of any absences (other than holidays) from work including time on dependants' leave, maternity/adoption/paternity leave, disability leave or sick leave
- Trade union membership
- Biometric data.

3. Why we collect and use this information

We use school staff data to:

- communicate with staff
- facilitate safe recruitment as part of our safeguarding obligations

- support performance management
- enable the development of a comprehensive picture of the workforce and how it is deployed
- improve the management of workforce data across the sector
- inform the development of recruitment and retention policies
- enable individuals to be paid
- allow better financial modelling and planning
- enable monitoring of selected protected characteristics
- ensure compliance with our legal obligations.

4. The lawful basis on which we use this information

Most data will be processed under Article 6 of the UK General Data Protection Regulation (UK GDPR) on the basis that:

- processing is necessary for the performance of a contract to which the member of staff is party or in order to take steps at the request of the data subject prior to entering into a contract
  or
- processing is necessary for compliance with a legal obligation to which we are subject
  or
- 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.

We may also process staff personal data in situations where:

- processing is necessary in order to protect the vital interests of the member of staff
  or
- the member of staff has given consent to the processing of their personal data for one or more specific purposes.

Where consent has been obtained to use your personal data, this consent can be withdrawn at any time. This will be made clear when we ask for consent and we will explain how consent can be withdrawn.

Occasionally, where the processing is not part of our performing tasks as a public authority, we may process data under the lawful basis that it is in our legitimate interests or the legitimate interests of a third party to do so. In these circumstances we would be using the data in a way that would be reasonably expected by the member of staff concerned and the processing will have a minimal privacy impact or there will be a compelling justification for the processing.

There may be more than one ground which justifies our use of a particular category of data.

If we need to process any special category data under Article 9 of the UK GDPR which is of a more sensitive nature, we will only do so if we have a lawful basis to do so under Paragraph 2 of Article 9 of the UK GDPR.

No decisions are made by the school through automated decision making (including profiling).

5. Collecting staff information

The majority of staff information collected is obtained directly from the member of staff concerned either as part of the application and recruitment process or upon their commencement of employment via initial application and payroll paperwork. However, we will collect additional personal information during job-related activities throughout the period of your employment with us.

The majority of this information will come directly from you. However, we may also hold data about staff which has been provided by another party, such as a former employer, a local authority, a government department or agency, the disclosure and barring service (DBS), a police force, a court of law or a tribunal.

Whilst most of the 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 Regulation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

Informing us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal information changes during your employment with us.

6. Storing data

Data is stored in a range of different locations, including your personnel file, the school's management information system (Bromcom) and the school's email system.

We will only retain your personal data for as long as it is necessary to fulfil the purposes for which it was collected and to satisfy any legal, accounting or reporting requirements. Specific data is kept in accordance with our retention policy which can be viewed upon request. However, most staff data is retained:

- throughout the period during which the member of staff remains employed by the school and
- up to six years plus the current year once a member of staff leaves the school.

When personal data is no longer needed, we will dispose of it in a secure manner.

We have data protection policies and procedures in place in order to protect data whilst it is in our possession. These include strong organisational and technical measures and these are reviewed regularly. For further information on how data is protected please contact the school's Data Protection Officer whose contact details can be found at the end of this privacy notice.

7. How we may use information about you

We will only use your personal information when the law allows us to do so. Most often, your personal information will be used where:

- we need to communicate with you
- we wish to enter into an employment contract with you
- we need to meet our obligations to you under an existing employment contract
- we need to comply with a legal obligation or statutory guidance, such as the guidelines contained within Keeping Children Safe in Education (KCSIE). For example, we are required to check a potential employee's suitability to work with children and their entitlement to work in the UK. We will also need to process your personal data in order to deduct tax, to comply with health and safety laws, administrate pension contributions and to enable you to take periods of leave to which you are entitled
- we are conducting an appraisal or managing performance
- we need to ascertain your fitness for work or manage sickness absence
- our intention is to protect your vital interests
- you have provided us with your consent to use your personal data in a particular way (for example a photograph of you being used for promotional purposes).

8. Sharing staff information

We do not share information about staff with any third party without consent unless the law and our policies require or allow us to do so.

We routinely share staff information with:

- Our local authority – for example: Payroll and Human Resources (HR ONE), pension data and safeguarding concerns
- The Department for Education (DfE)
- Her Majesty's Revenue and Customs (HMRC)
- Health authorities
- An occupational health service provider
- A staff absence insurance service
- An employee assistance programme (currently Heales Medical)
- IT support services (Scomis and Purple Dog IT Ltd)
- Our auditors
- Ofsted.

Less often, we may also need to share information with other individuals or organisations. These may include charities and voluntary organisations, professional advisors and consultants, our insurers, police forces, courts and tribunals.

Personal data may occasionally be shared with our Data Protection Officer, for example in relation to a Subject Access Request.

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

Why we share school staff information

Local authority

We are required to share information about our staff 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. This data sharing underpins staff policy monitoring, evaluation and links to school funding/expenditure and the assessment of educational attainment.

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. For more information about the department's data sharing process, please visit: https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data

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, please see the 'How the Government uses your data' section of this privacy notice.

Responding to personal information requests – e.g. Subject Access Requests

The school may be requested to share information it holds about a data subject (e.g. a pupil, parent or another member of staff). Meeting such a request may involve the disclosure of records that include your

name as the Information Commission considers that the names of school employees may be disclosed so long as the reference to them relates to their work for the school.

Pensions

Our pension providers are the data controller for the information they process for the management and administration of the relevant pension service. Our pension provider is Peninsula Pensions. As such, they will have their own privacy notice for how they process your personal data and they should be contacted directly if you have any queries or concerns over the handling of your data: https://www.peninsulapensions.org.uk/contact-us/.

9. Requesting access to your personal data and your data protection rights

Under data protection legislation, you have the right to request access to information about you that we hold by making a Subject Access Request.

If you make a Subject Access Request we will:

- Give you a description of the information held
- Tell you why we are processing it and for how long we will keep it
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form.

You also have the right to:

- Object to processing of personal data if it is likely to cause, or is causing, damage or distress
- Prevent processing of your personal for the purpose of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances: have personal data erased or destroyed, restrict the processing of data and have inaccurate or incomplete personal data rectified
- Seek redress, either through the Information Commission's Office or through the courts.

In certain circumstances, individuals also have the right for their personal information to be transmitted electronically to another organisation.

References we provide to or receive from third parties are considered to have been provided in confidence. Any requests for access to confidential references will be considered taking into account the wishes of the third party involved.

If you would like to make a Subject Access Request or exercise another of the above rights, please contact our Data Protection Officer whose contact details are listed at the end of this notice. You will not have to pay a fee in order to exercise any of these rights. However, we may charge a reasonable fee if you wish to receive more than one copy of your records as part of a Subject Access Request.

In order to ensure that personal information is not disclosed to any person who has no right to receive it, we may need to request specific information or evidence from you to help us confirm your identity and establish your right to access the information prior to processing your request.

10. Withdrawal of consent and the right to lodge a complaint

Withdrawing consent

Where we are processing your personal data based on your consent, you have the right to withdraw that consent at any time by contacting the school office:

Castle Primary School
1 Barrington Street
Tiverton
Devon
EX16 6QR

Email: admin@castletiverton.school
Telephone: 01884 253398

Making a complaint

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 the school in the first instance by contacting our Data Protection Officer (see Contact Us below) to express your concerns.

In compliance with the Data (Use and Access) Act 2025 (DUAA) we will acknowledge receipt of the complaint within 30 days and take appropriate steps in response.

However, if you remain dissatisfied after we have replied to your concerns you may then complain to the Information Commission's Office:

- online at https://ico.org.uk/concerns/
- by phoning 0303 123 1113
- by writing to the Information Commission's Office, 4th Floor, No.3 Circle Square, 5 Hawkshaw Street, Manchester M1 7BL.

11. 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 on 13th November 2026.

12. Contact us

If you have any questions or concerns or you would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer (DPO):

Alvin Scott (DPO)
Copplestone Primary School
Bewsley Hill
Copplestone
Crediton
Devon
EX17 5NX

Email: dpo@devonmoorsfederation.devon.sch.uk.

13. How the Government uses your data

The workforce data that we lawfully share with the Department for Education 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
- 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 including the data that we share with them, please go to https://www.gov.uk/education/data-collection-and-censuses-for-schools.

Sharing by the Department for Education (DfE)

The Department for Education may share information about 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 third parties are subject to a strict approval process and based on a detailed assessment of:

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

To be granted access to 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.

How to find out what personal information the Department for Education holds about you

Under the terms of the Data Protection Act 2018, you're entitled to ask the Department:

- 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, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:
https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter

Options for contacting the DfE are available via the following web page: https://www.gov.uk/contact-dfe