

# Honiton Primary School

## Privacy Notice for Staff



### 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 basis 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 at the end of this notice. We, Honiton Primary School, are the Data Controller for the purposes of data protection law.

### Categories of information

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

- personal identifiers and contact details (such as names, date of birth, employee or teacher number, national insurance number, home address, previous home address, email address, telephone number, next of kin)
- special categories of data including characteristics (such as gender, age, ethnic group, health data, trade union membership)
- contract (such as start dates, hours worked, post, job roles and salary information)
- work absence (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught)
- payroll (such as bank account details)
- relevant information regarding safeguarding
- performance (including outcomes of any disciplinary and/or grievance procedures)
- images (for internal safeguarding and security purposes and images captured on the school CCTV)
- driving (such as vehicle details and driver's documentation)
- data about your use of the school's information and communications system

### 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
- 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
- inform budget planning
- support performance management
- enable monitoring of selected protected characteristics
- ensure compliance with our legal obligations

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
- processing is necessary for compliance with a legal obligation to which we are subject
- 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
- the member of staff has given consent to the processing of their personal data for one or more specific purposes

Where we have obtained consent to use personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and 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 General Data Protection Regulation (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 General Data Protection Regulation (UK GDPR).

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

### **Collecting staff information**

Staff data is essential for the school's operational use. Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

The majority of staff information collected is obtained directly from the member of staff concerned either as part of the recruitment process or upon their commencement of employment via initial application and payroll paperwork.

We may also hold data about staff which has been provided by another party, such as a local authority, a government department or agency, a police force, court of law or tribunal.

### **Storing data**

In order to protect data whilst it is in our possession, we have data protection policies and procedures in place. These include strong organisational and technical measures and these are reviewed regularly.

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

Personal data is stored in accordance with our general data protection policy, records retention policy and Information Toolkit for Schools (IRMS). When your relationship with the school has ended and your personal data is no longer needed, we will retain and dispose of it in a secure manner in accordance with these policies.

For more information on how we keep your data safe, please contact the school's Data Protection Officer whose contact details can be found at the end of this privacy notice, or visit: <https://www.honitonprimary.co.uk/gdpr-foi/>

### **Who we share staff information with**

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

Where there is a legal requirement to do so, or it is otherwise necessary and it complies with data protection law, we may share information with:

- our local authority – for example Payroll, Human Resources (HR), pension data and safeguarding concerns
- the Department for Education (DfE)
- Her Majesty's Revenue and Customs (HMRC)
- health authorities
- Medigold Health
- Peninsula Pensions
- absence insurance providers
- Ofsted
- our auditors
- IT support services
- professional advisors and consultants
- police forces, courts and tribunals
- charities and voluntary organisations

#### *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. 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. 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-protectionhow-we-collect-and-share-research-data>

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 the 'How Government uses your data' section of this notice.

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.

## **Requesting access to your personal data and your data protection rights**

Under data protection legislation, individuals have the right to request access to information held about them by making a Subject Access Request.

If you make a Subject Access Request, and if we do hold information about you, 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

Depending on the lawful basis under which personal data is held, you also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing of your personal data 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 personal data rectified
- seek redress, either through the Information Commissioner'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.

If you would like to make a Subject Access Request, or exercise another of the above rights, please contact the school or our Data Protection Officer whose contact details are listed at the end of this notice.

## **Withdrawal of consent and the right to lodge a complaint**

Where we have obtained consent to use personal data, this consent can be withdrawn at any time by contacting the school or our Data Protection Liaison Officer:

Alison Carder (DPLO)  
Honiton Primary School  
Clapper Lane  
Honiton

Devon  
EX14 1QF  
Email: admin@honiton-pri.devon.sch.uk  
Telephone: 01404 548700

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concerns about our data processing, please raise this concern with us in the first instance by contacting our Data Protection Officer whose contact details are listed at the end of this notice.

Alternatively, you can contact the Information Commissioner's Office:

- report a concern online at <https://ico.org.uk/concerns/>
- call 0303 123 1113
- or write to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

## 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 March 2025.

## Contact us

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

**Jenny Goodall**  
**Data Protection Officer (Schools)**  
**School Data Protection Team**  
**Devon Education Services**, Devon County Council  
Room L60, County Hall, Topsham Road, Exeter, EX2 4QD  
Tel : 01392 383445

## How Government uses your data

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

- informs government policy on matters related to child and family social workers
- may be used to inform the distribution of funding to local authorities
- supports 'longer term' research and monitoring of children's social care 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, go to <https://www.gov.uk/guidance/childrens-social-work-workforce-census-guide-to-submitting-data>

## Sharing by the Department

The Department 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 Department 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 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.

To contact the department: <https://www.gov.uk/contact-dfe>