



## **School Workforce Privacy Notice**

### **Common Road Infant & Nursery School**

**April 2026**

Workforce is defined as all paid staff including those on placements, secondments, and agency staff.

It will also include local authority staff engaged and paid by the governors of the school and for unpaid staff /volunteers.

### **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)

This list is not exhaustive, to access the current list of categories of information we process please speak to your Data Protection Lead.

This could also include medical information, addresses, Next Of Kin, Payroll information, bank details

### **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
- d. comply with HMRC and employment legislation

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

Article 6 (1) (c). processing is necessary for compliance with a legal obligation to which the controller is subject.” and 6 (1) (e) - 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 addition, concerning any special category data we rely on Article 9:

- Article 9 (2) (a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes,
- 9 (2) (c) To protect the vital interests of the individual;
- 9 (2) (f) in the event of legal claims or judicial acts,
- 9 (2) (i) As required for purpose of public health (with a basis in law)

## **Collecting workforce information**

We collect personal information via staff contract forms.

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 workforce data securely for the set amount of time shown in our data retention schedule. We have adopted the Information and Records Management Society (IRMS) recommendations as our data retention schedule.

## **Who we share workforce information with**

We routinely share this information with:

- our Local Authority (LA) Children’s Services, the LA payroll department
- the Department for Education (DfE)
- HM Revenue and Customs (HMRC)
- HR (Human Resources) provider
- Occupational Health
- Insurance company

### **1. Statutory returns to the Department for Education (DfE)**

Why shared

Mandatory workforce data collections (e.g. School Workforce Census)

Legislation

Education Act 1996

The Education (School Information) (England) Regulations 2008

UK GDPR Article 6(1)(c) – Legal obligation

Data Protection Act 2018 (DPA 2018)

## **2. Payroll, pensions and HMRC reporting**

Why shared

Paying staff salaries

Tax, National Insurance, and pension contributions (TPS/LGPS)

Legislation

Income Tax (Earnings and Pensions) Act 2003

Pensions Act 2008

UK GDPR Article 6(1)(c) – Legal obligation

UK GDPR Article 6(1)(b) – Contract

DPA 2018

## **3. Disclosure and Barring Service (DBS) checks**

Why shared

Safeguarding checks for staff and volunteers

Legislation

Safeguarding Vulnerable Groups Act 2006

Police Act 1997

Keeping Children Safe in Education (statutory guidance)

UK GDPR Article 6(1)(c) – Legal obligation

UK GDPR Article 9(2)(g) – Substantial public interest

DPA 2018 Schedule 1, Part 2

#### **4. Teaching Regulation Agency (TRA)**

Why shared

Teacher misconduct investigations

Prohibition orders

Qualified Teacher Status (QTS) verification

Legislation

Education Act 2002

Teachers' Disciplinary (England) Regulations 2012

UK GDPR Article 6(1)(c) – Legal obligation

#### **5. Local Authority (maintained schools)**

Why shared

HR support, safeguarding oversight, finance, payroll, and statutory monitoring

Legislation

Education Act 2002

Local Government Act 1972

UK GDPR Article 6(1)(e) – Public task

UK GDPR Article 6(1)(c) – Legal obligation

#### **6. Multi-Academy Trust (MAT) central teams**

Why shared

HR management

Safeguarding oversight

Governance, audits, and compliance

Legislation

Academies Financial Handbook

Charities Act 2011

UK GDPR Article 6(1)(e) – Public task

UK GDPR Article 6(1)(f) – Legitimate interests

## **7. Occupational health and wellbeing services**

Why shared

Fitness to work assessments

Reasonable adjustments

Absence management

Legislation

Health and Safety at Work etc. Act 1974

Equality Act 2010

UK GDPR Article 6(1)(c) – Legal obligation

UK GDPR Article 9(2)(b) – Employment law

UK GDPR Article 9(2)(h) – Health or social care

## **8. Trade unions and professional bodies**

Why shared

Union subscriptions (with consent)

Professional accreditation where required

Legislation

Trade Union and Labour Relations (Consolidation) Act 1992

UK GDPR Article 6(1)(a) – Consent

UK GDPR Article 6(1)(b) – Contract

## **9. Legal advisers, insurers and auditors**

Why shared

Employment disputes

Claims handling

Statutory audits

Legislation

Employment Rights Act 1996

Limitation Act 1980

UK GDPR Article 6(1)(f) – Legitimate interests

UK GDPR Article 6(1)(c) – Legal obligation

## **10. Police, courts and regulatory bodies**

Why shared

Criminal investigations

Court orders

Regulatory enforcement

Legislation

Crime and Disorder Act 1998

Police and Criminal Evidence Act 1984

Court orders / subpoenas

UK GDPR Article 6(1)(c) – Legal obligation

UK GDPR Article 6(1)(e) – Public task

## **11. References to prospective employers**

Why shared

Employment references (factual, safeguarding-aware)

Legislation

UK GDPR Article 6(1)(f) – Legitimate interests

Keeping Children Safe in Education (safeguarding duty)

## **12. IT service providers and cloud systems**

Why shared

Email, MIS, HR systems, payroll software, access control

Legislation

UK GDPR Article 6(1)(e) – Public task

UK GDPR Article 28 – Processor contracts

DPA 2018

### **Third party systems used for staff information**

CPOMS

Arbor (MIS)

My People (HR, Payroll & absence system)

Email

OH Portal

### **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.

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-providers-workforce-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 [headteacher@commonroad.wakefield.sch.uk](mailto:headteacher@commonroad.wakefield.sch.uk) / Tim Pinto at The E-Safety Office Ltd (tpinto@esafetyoffice.co.uk).

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 any concerns about how the school processes your personal data, you have the right to raise a complaint directly with us in the first instance. We encourage all data subjects to follow the school's internal complaints procedure, details of which are set out in the Data Protection Policy available on our website or upon request. The School will investigate all data protection concerns in accordance with its obligations under the UK General Data Protection Regulation and the Data Protection Act 2018 and will respond within a reasonable timeframe. If, after exhausting the school's complaints process, you remain dissatisfied, you have the right to lodge a complaint with the Information Commissioner's Office (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 the headteacher.

## **Contact**

If you would like to discuss anything in this privacy notice, please contact:  
headteacher@commonroad.wakefield.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-information-charter>

or

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

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