

# Privacy Notice - Staff



**Policy last reviewed: June 2025**

**Next review due: June 2026**

**Member of staff responsible: HR Lead**

**Governor's Committee: N/A SLT**

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**Vision Statement:** Our vision is to be a centre of excellence for learning, inspired by Christian values, where every person in our school community fulfils their potential.

**Mission Statement:** Our mission is to be a deeply Christian inclusive community which values every individual as a child of God.

**Values Statement:** The school aims to serve its community by providing an education of the highest quality within the context of Christian belief and practice. It encourages an understanding of the meaning and significance of faith and promotes Christian values through the experience it offers to all its students.

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**Dignity** Underpinning all that we do is the core belief in the ultimate worth of each person as a child of God – precious, valued and loved by God. Dignity comes from the knowledge of our ultimate worth as human beings.

**Community** Having understood our value as individual human beings, we express this value through the quality of the relationships that we share with each other. Community, living well together, is of very great importance to us as a school, as is the place we each take in the wider community locally, nationally and internationally.

**Wisdom** As a school we seek to foster confidence, delight and discipline in seeking wisdom, knowledge and truth. This is achieved through the nurturing of academic habits and skills, emotional intelligence, resilience and creativity across the breadth of the curriculum.

**Hope** As we prepare our students for the future we look to open up horizons of hope and aspiration, encouraging our students to embrace these with confidence and sending them out to make a difference to the world in which they live.

## **Privacy Notice**

### **The School Workforce: those employed to teach, or otherwise engaged to work at, a school or a local authority**

#### The UK General Data Protection Regulation (UK GDPR)

We, Holy Trinity School, take the protection of your personal data very seriously and strictly adhere to the rules laid out by data protection laws and the General Data Protection Regulation (GDPR-EU and GDPR-UK).

#### Data Controller

Holy Trinity Church of England Secondary School complies with the UK GDPR and is registered as a 'Data Controller' with the Information Commissioner's Office (Reg. No. Z7244027).

The Data Protection Officer (DPO) for the School is Bulletproof Ltd, an outsourced specialist in Data Protection and DPO service.

We ensure that your personal data is processed fairly and lawfully, is accurate, is kept secure and is retained for no longer than is necessary.

#### The Legal Basis for Processing Personal Data

The main reason that the school processes personal data is because it is necessary in order to comply with the schools legal obligations and to enable it to perform tasks carried out in the public interest.

The school may also process personal data if at least one of the following applies:

- in order to protect the vital interests of an individual
- there is explicit consent.
- to comply with the school's legal obligations in the field of employment and social security and social protection law
- for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity
- for reasons of public interest in the area of public health
- for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, based on law, or pursuant to contract with a health professional

- for reasons of substantial public interest, based on law, which is proportionate in the circumstances and which has provided measures to safeguard the fundamental rights and the interests of the data subject;

**The categories of school workforce information that we collect, process, hold and share (when appropriate) includes, but is not restricted to:**

- personal information (such as name, contact details, employee or teacher number, national insurance number, date of birth, bank account details, tax status,)
- special categories of data including characteristics information such as gender, age, ethnic group, disability status and relevant notified medical information e.g. chronic life threatening health conditions
- contract information (such as start dates, hours worked, post, pension, roles and salary information)
- photographic image for ID and access badge and database
- work absence information (such as number of absences and reasons)
- performance (such as appraisal, capability and disciplinary matters)
- qualifications (and, where relevant, subjects taught)
- information relevant to the School Work Force Census and absence information.
- Recruitment information, references and other information gathered as part of the application process (including copies of Right to Work in the UK and Identity Check documentation such as passport, birth certificate, national insurance, driving license, application form and information on disclosures, subjects taught, employment work history, training records, professional memberships)
- Next of kin and emergency contact information (in the event of a medical or other emergency)
- CCTV footage
- Data about your use of the school's information and communication system
- Biometric information

Why we collect and use staff information

We process personal data relating to those we employ to work at, or otherwise engage to work at our School for:

- employment purposes

- enable the development of a comprehensive picture of the workforce and how it is deployed
- Facilitate safe recruitment as part of our safeguarding obligations towards students
- inform the development of recruitment and retention policies
- to assist in the running of the School
- to enable individuals to be paid.

The collection of this information will benefit both national and local users by:

- improving the management of workforce data across the sector
- enabling development of a comprehensive picture of the workforce and how it is deployed
- informing the development of recruitment and retention policies
- allowing better financial modelling and planning
- enabling ethnicity and disability monitoring; and
- supporting the work of the School Teachers' Review Body
- protecting vulnerable individuals.
- the prevention and detection of crime

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 school workforce information to us or if you have a choice in this.

#### Who we share this information with

We will not give information about you to anyone outside the School without your consent unless the law allow us to.

We routinely share this information with:

- our local authority
- the Department for Education (DfE)
- our regulator e.g. Ofsted, the Dioceses of Chichester
- suppliers and service providers – to enable them to provide the service we have contracted them for, such as but not limited to Payroll (CAPITA); employment advice (CAPITA);

Health & Safety advice (CAPITA); school information management system (SIMS – CAPITA); Occupational Health advice (Health Assured); appraisal software (Blue Sky); HMRC (tax information); staff registration (inVentry); catering (Nourish and Caterlink- biometric data for staff lunch accounts); DBS checks (Atlantic Data); management of trips, visits, events (Evolve); on line payments (Tucasi); photography (Braiswick); CCTV (Vistech); secure door entry systems (Net2); providers of pupil information, management and communication systems (SLGW, SMHW, Parentmail); preparation of university personal statements (Unifrog)); teaching and learning data including typicality (SISRA Observe).

- Police forces, courts, tribunal,
- Professional bodies such as NCTL and TRA in event of misconduct
- Disclosure and Barring Service in the event that a staff member has harmed someone

#### Why we share school workforce information

We do not share information about 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)

We share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding / expenditure and the assessment educational attainment.

We are required to share information about our school employees with our local authority (LA) and the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

#### Data collection requirements

The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). 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

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/education/data-collection-and-censuses-for-schools>

The department 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 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 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.

For more information about the department's data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

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

### Retention Periods

Personal data will not be retained by the School for longer than necessary in relation to the purposes for which they were collected.

Information will be held in accordance with the Information and Records Management Society Tool Kit for Schools.

<https://irms.site-ym.com/page/SchoolsToolkit>

### CCTV

The school operates CCTV on the school site as it is considered necessary to protect student and staff safety and/or the school's property

## Biometrics

The School operates biometric recognition systems for purchasing food in the refectory

All data collected will be processed in accordance with the GDPR data protection principles and the Protection of Freedoms Act 2012

Your written consent will be obtained before biometric data is taken and used.

## Rights

You have the right to:

1. be informed of data processing (which is covered by this Privacy Notice)
2. access information (also known as a Subject Access Request)
3. have inaccuracies corrected
4. have information erased
5. restrict processing
6. data portability (this is unlikely to be relevant to schools)
7. intervention in respect of automated decision making (automated decision making is rarely operated within schools)
8. Withdraw consent (see below)
9. Complain to the Information Commissioner's Office (See below) To exercise any of these rights please contact the DPO

## Withdrawal of Consent

The lawful basis upon which the School process personal data is that it is necessary in order to comply with the Schools legal obligations and to enable it to perform tasks carried out in the public interest.

Where the School process personal date solely on the basis that you have consented to the processing, you will have the right to withdraw that consent by requesting, in writing, to [hr@holytrinitycrawley.org.uk](mailto:hr@holytrinitycrawley.org.uk)

## Complaints to ICO

If you are unhappy with the way your request has been handled, you may wish to ask for a review of our decision by contacting the DPO.

If you are not content with the outcome of the internal review, you may apply directly to the Information Commissioner for a decision. Generally, the ICO cannot make a decision unless

you have exhausted our internal review procedure. The Information Commissioner can be contacted:

By Post:

The Information Commissioner's Office,

Wycliffe House,

Water Lane,

Wilmslow,

Cheshire

SK9 5AF

By Website: [Click here](#)

By phone: 0303 123 1113