



Privacy Notice – Workforce

Brockley Primary School

Version 5

Last Reviewed	June 2025
Reviewed By (Name)	Jayne Saxton
Job Role	School Business Manager
Next Review Date	June 2026
Version produced Spring 2025	Spring 2025

This document will be reviewed annually and sooner when significant changes are made to the law.

Guidance from the Department for Education about school policies can be found here:

<https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts>

Contents

1. Privacy Notice (How we use workforce information).....	3
2. The categories of school workforce information that we process	3
3. Why we collect and use workforce information.....	3
3.1 Marketing Purposes	4
3.2 Automated decision making & profiling	5
4. How we collect workforce information	5
5. How, where and for how long we store workforce information	5
6. Who we share workforce information with.....	5
7. Why we share workforce information	6
8. Local Authority	6
9. Freedom of Information Act and Environmental Information Regulations 2004.....	6
10. Requesting access to your personal data	7
11. How Government uses your data	7
11.1 Data collection requirements	8
11.2 Sharing by the Department.....	8
12. Last updated.....	8
13. Contacts	9

1. Privacy Notice (How we use workforce information)

Brockley Primary School collect, hold, use and share information about our workforce. This is known as “personal data” and you have rights around that data, including knowing how and why we are processing the data. “Processing” data means everything from collecting, to storing, using, sharing and disposing of it. The school workforce includes all those employed to teach, or otherwise engaged to work, either on a paid, contracted or voluntary basis, at the school.

For the purposes of Data Protection legislation Brockley Primary school is a data controller and is registered as such with the Information Commissioner’s Office.

2. The categories of school workforce information that we process

The categories of workforce information that we process include:

- personal information (such as name, address, employee or teacher number, national insurance number)
- characteristics such as ethnicity, language, religion and identity*
- equalities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief*
- contract information (such as start date, hours worked, post, roles and salary information)
- work absence information (such as number of absences and reasons) and relevant medical information*
- qualifications (and, where relevant, subjects taught)
- photographic records
- information about medical or health conditions, including whether you have a disability for which the school needs to make reasonable adjustments*
- details of trade union membership if you pay your subscriptions through payroll*
- next of Kin and emergency contact details
- recruitment information including right to work documentation, confidential references, application and/or CV
- checks made regarding online presence including social media searches
- performance information
- information relating to grievance and/or disciplinary procedures
- your use of school devices and networks as part of our safeguarding procedures
- information about any criminal convictions, offences, cautions and prohibitions. This information may have come from other organisations including former employers, Teacher Regulation Agency, social services and the Disclosure & Barring Service.*

Items marked with an asterisk * are particularly sensitive, and so are known as special category or criminal offence data. This includes data that the Department for Education advises we treat as special category.

Some of the legal conditions for processing special category and criminal offence data require us to have an Appropriate Policy Document (‘APD’) in place, setting out and explaining our procedures for securing compliance with the data protection principles and to have policies regarding the retention and erasure of such personal data. This document is our Special Category Data Policy Document and should be read alongside this Privacy Notice.

3. Why we collect and use workforce information

We use workforce data to:

- 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
- facilitate safer recruitment (e.g. by carrying out criminal records checks and requesting references)
- support effective performance management
- allow better financial modelling and planning
- support the management of absence
- photographic images for identification purposes (safeguarding), and celebration purposes (to record work, classes and school events)
- to meet our statutory duties
- for site safety and security
- to protect public monies against fraud
- to detect and prevent crime and combat fraud
- to streamline systems

Under the UK General Data Protection Regulation (UK GDPR), the legal basis for processing your personal information include:

- Article 6(a) – Your consent (for any processing which does not fall into the other bases explained below)
- Article 6(b) Contract (your contract of employment)
- Article 6(c) - Compliance with our legal obligations

In particular, but not exclusively:

Section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments

Keeping Children Safe in Education 2024 (statutory guidance from the Department for Education issued under Section 175 of the Education Act 2002 etc).

Equality and Health & Safety legislation.

- Article 6(d) - Being necessary for us to protect your, or someone else's, Vital Interests (potentially lifesaving)
- Article 6(e) – Carrying out tasks in the Public Interest.
- Article 6(f) – For legitimate Interests (as this generally relates to commercial practice, this may only be relevant to MATs and their relation to trust level staff or fundraising activities in maintained schools)

The ways we collect and use *sensitive* workforce information are lawful based on Articles 9 and 10 of UK GDPR. Please see our Special Category Data Policy document for full details of these lawful bases for processing this data.

Where we are processing your personal data with your consent, you have the right to withdraw that consent.

3.1 Marketing Purposes

Where you have given us consent to do so, we may send you marketing information by text message or email promoting school events, campaigns and or charities. You can withdraw this consent at any time by contacting us (see the Contacts section) or by emailing the Headteacher or School Business Officer with your opt out request.

3.2 Automated decision making & profiling

We do not currently process any personal data through automated decision making or profiling. Should this change in the future, privacy notices will be updated to explain both the processing and your right to object to it.

4. How we collect workforce information

We collect this information in a variety of ways. For example, data is collected through application forms, obtained from your passport or other identity documents such as your driving licence, from forms completed by you at the start of or during employment (such as pension benefit nomination forms), from correspondence with you, or through interviews, meetings or other assessments, self-certification forms [medical], Fit Notes, images provided by individuals or taken using school's photographic equipment, local authorities, previous employers, NHS, law enforcement agencies e.g. police, the Disclosure and Barring Service and the Department for Education [DfE].

We sometimes audio/ video record sessions/lessons/assessments for pupil or staff development and assessment. This will generate personal data including staff images, names, contributions, and will be protected, processed and retained in the same way as all personal data, in line with the school's Data Protection Policies and in accordance with our other policies including Acceptable Use, Off Site Working and Bring Your Own Device policies, as well as our Retention Schedule. Recordings in these circumstances will be carried out in line with our HR policies.

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. We will inform you at the point of collection, whether you are required to provide certain information to us and your rights in relation to this.

5. How, where and for how long we store workforce information

We store workforce information securely on the school's IT network, this is hosted by Mercury AVS. Data backups are completed both daily and weekly, data is stored in a secure UK data centre run by Connections 4 London Limited. Security includes encrypted backups and limited staff access to school data. Secure storage is provided for paper based records.

We only keep the information for the length of time we need it for, as shown in our data retention schedule. For more information on our data retention schedule, please visit both the school policy and GDPR section of the school website.

We dispose of personal information securely when we no longer need it.

6. Who we share workforce information with

We routinely share this information with:

- our Local Authority (particularly in relation functions related to HR, payroll and Criminal Records checks)
- our Governing Body
- the Department for Education (DfE) inc. the Teaching Regulation Agency
- HMRC
- The Disclosure and Barring Service

- Employers where references are requested – we will always mark these as confidential
- law enforcement agencies e.g. police
- External systems used by the school to carry out day to day processes and requirements. For example, and not limited to; Arbor MIS, HR platforms and HR Finance, Communication system, Payment system (inc. Catering Payment system), Progress Checking/Assessment Tracking system, IT Provider, Cloud storage, Microsoft, Google Classrooms, Website, Accident system, Booking systems (e.g., parents evening), Curriculum Programmes e.g., Learning platforms, Homework, Library, School Photographer, Social Media, Trips.

See Appendix 1 for a comprehensive list of the external agencies we share information with.

Your personal information may be transferred outside the UK and the European Economic Area ('EEA'), including to the United States. Where information is transferred outside the UK or EEA to a country that is not designated as "adequate" in relation to data protection law, the information is adequately protected by the use of International Data Transfer Agreements and security measures, and other appropriate safeguards. For more information on international transfers, please contact us at the details below.

7. Why we share 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.

8. 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.

This may include, inter alia matters relating to the following: -

- payroll,
- contracts,
- Occupational Health

9. Freedom of Information Act and Environmental Information Regulations 2004

As a public body, our school is subject to requests made under the above legislation. Therefore, we have a legal obligation to process any personal data we hold when considering requests under these laws.

For example, we may receive a request asking about numbers of staff with particular levels of professional qualification.

However, we will never disclose personal data in our responses to these requests where to do so would contravene the principles of data protection.

10. Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the school Office, the Headteacher or the Data Protection Officer.

You also have the right to:

- be informed about the collection and use of your personal data.
- rectification, ie to have inaccurate personal data rectified, or completed if it is incomplete.
- erasure, often known as the ‘right to be forgotten’; however, this does not apply where, amongst other things, processing is necessary to comply with a legal obligation.
- restrict processing, although, as above this is a limited right.
- object; though other than for marketing purposes, this is also limited as above.
- Where we rely on your consent to process your data, you have the right to withdraw that consent. If you do change your mind, or you are unhappy with our use of your personal data, please let us know – our contacts are in section 2.14 at the end of this document.
- You also have rights in relation to automated decision making and profiling, though these are not currently relevant
- Finally, the right to seek redress, either through the ICO, or through the courts.

If you make a request, we will keep a record of the request and any personal data supplied for a suitable period after its fulfilment, in order to deal with any questions you, your representatives or regulators may have about it.

11. How Government uses your data

We share personal data with the Department for Education (DfE) on a statutory basis. We are required to share information about our school employees with the Department for Education (DfE) under the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments. All data is transferred securely and held by DfE under a combination of software and hardware controls which meet the current government security policy framework. 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>

The workforce data we share with the DfE 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.

For all information relating to how the DfE uses your information please visit: [Privacy information: education providers’ workforce, including teachers - GOV.UK](#)

11.1 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>.

11.2 Sharing by the Department

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 will comply with our strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

If you need more information about how our local authority and/or DfE collect and use your information, please visit:

- our local authority at <http://www.derbyshire.gov.uk/privacynotices> ; or
- the DfE website at <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

If you are unable to access these websites, please contact:

12. 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 5th August 2025.

13. Contacts

If you have a concern about the way we are collecting or using your personal data or you would like to discuss anything in this privacy notice, we ask that you raise your concern with us in the first instance.

Please contact the school Office, or the Data Protection Officer:

Data Protection Officer Education Data Hub (Data Protection), Derbyshire County Council
DPO Email: dpforschools@derbyshire.gov.uk
DPO Phone: 01629 532888
DPO Address: County Hall, Smedley Street, Matlock, Derbyshire, DE4 3AG

For Derbyshire County Council:

Information Governance Officer
Children's Services Department, Derbyshire County Council
County Hall
Matlock
Derbyshire
DE4 3AG

Email: cs.infogov@derbyshire.gov.uk

Telephone: 01629 536906

For DfE:

Public Communications Unit,
Department for Education,
Sanctuary Buildings,
Great Smith Street,
London, SW1P 3BT

Website: www.education.gov.uk

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

Email: <http://www.education.gov.uk>

Telephone: 0370 000 2288

If however you are dissatisfied with our response to your concerns you can of course contact the ICO quoting our ICO registration number Z6445458 and stating that the Data Controller is Brockley Primary School.

Information Commissioners' Office

Wycliffe House
Water Lane
Wilmslow
Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

Fax: 01625 524 510

Website: <https://ico.org.uk/concerns/>

Appendix 1 - Suppliers and Systems

2Simple Ltd

Purple Mash

3P Learning Ltd

Mathletics

Angel Solutions Ltd

Perspective Lite

Alternative Provision Early Help

Alternative Provision Sport Careers Music or Other

Governance and Finance

Photographs

Pupil Assessment and Tracking

Pupil Files (non SEND)

Pupil Meal Registers

Pupil Work

Safeguarding Pupil Files

SEND Pupil Files

Sign in records and evacuation lists

Staff HR Files

Staff Recruitment Files

Teacher planning

Trips and Visit Records

Charanga Ltd

Musical School

ClassDojo, Inc

Class Dojo

Classroom Secrets Ltd

Classroom Secrets

Clifton EMAG Ltd

EAZ MAG

COMMUNITY BRANDS UK LIMITED

Teachers2Parents

Cool Milk at School Ltd

Cool Milk

Brockley Primary School - L830-2046

Create Development Limited

Real PE

DEPARTMENT FOR EDUCATION - DFE

Analyse School Performance (ASP)

Automated Attendance Data

Check Your Performance Measures Data

COLLECT

Common Transfer Form (CTF)

DfE Sign-in

Eligibility Checking System (ECS)

Get Information About Schools (GIAS)

Key to Success (KtS)

Learning Records Service (LRS)

National Curriculum Tools (NCA Tools)

National Pupil Database (NPD)

Ofsted

Primary Assessment Gateway

Pupil Census

Pupil Premium Review

School to School (S2S)

Standards and Testing Agency

Teacher Services

Teachers' Pensions

Derby and Derbyshire Safeguarding Children Partnership

DDSCP

Derbyshire County Council

Derbyshire County Council
Derbyshire Services for Schools (DS4S)
SAP for Schools

Edenred (UK Group) Limited

Edenred

Edge Hill University

Every Child Counts

eduFOCUS Limited

Educational Visits Online Management System EVOLVE

GDPRiS

GDPRiS

Globebrow Ltd t/a Manor Adventure

Manor Adventure

IntraHealth Ltd

IntraHealth

Maths Circle Ltd

Times Table Rockstars

Meta Platforms Inc (Facebook) Inc.

Facebook

Microsoft UK

Forms
Teams

NHS England

School Fruit and Vegetable Scheme (SFVS)

ParentPay Limited

ParentPay

Pearson PLC

Bug Club

Playwaze Limited

Playwaze

Positive 4 Young People

Positive 4 Young People

PrimarySite Limited

PrimarySite

Raspberry Pi Foundation

Raspberry Pi

RM Education Ltd

Integris - see Arbour for miS

Seesaw Learning Inc

Seesaw

Teach Active Ltd

Maths of the Day

The Education Shed Ltd (prev. The Spelling Shed)

Literacy Shed +

Spelling Shed

The Key Support Services Limited

The Key for School Leaders

The Safeguarding Company

MyConcern

Virtual Class Limited (t/a Third Space Learning)

Third Space Learning Maths

Wonde Ltd

Wonde

Youth Hostel Association

Youth Hostel Association

Youth Sport Trust

Youth Sport Trust

Zoom Video Communications Inc

Zoom