Privacy Notice for Staff–How we use your information

Who are we?
Suckley School is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.
Suckley School is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: Z2854546
You can contact the Suckley School Data Controller in writing at:
FAO Headteacher, Suckley School, Church Lane, Suckley, Worcestershire. WR6 5DE or email head@suckley.worcs.sch.uk

What is a Privacy Notice?
A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our staff.

What is Personal Information?
Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.
'Special category' personal information reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

What personal information do we process about staff?
The categories of staff information that we collect, hold and share include:

- personal information such as name, employee or teacher number and national insurance number
- special categories of data including characteristics information such as gender, age, ethnic group
- contract information such as start dates, hours worked, post, roles and salary information
- work absence information such as number of absences and reasons
- qualifications and, where relevant, subjects taught

For what purposes do we use personal information?
We use staff data to:

- develop a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- enable individuals to be paid and receive other staff benefits
- ensure that we can act in an emergency

Collecting staff information
Whilst the majority of staff information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain staff information to us or if you have a choice in this.

What are the legal reasons for us to process your personal information?
We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. Data Protection law sets out the lawful reasons we have to process your personal information and these are as follows:

1) To comply with the law
We collect and use general purpose staff information in order to meet certain legal requirements and legal obligations placed upon the Academy by UK law. We therefore have the right to process your personal information for such purposes without the need to obtain your consent.
Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

2) To protect someone's vital interests
We are able to process personal information when there is an emergency and/or where a person's life is in danger.
Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

3) With the consent of the individual to whom that information 'belongs'
Whilst much of the personal information is processed in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In those circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.
Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

4) To perform a public task
It is a day-to-day function of the Academy Trust to ensure that staff members receive the training and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that staff are properly supported and able to do their job.
Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

5) To comply with a contract we have with you or because you have asked us to take specific steps before entering into a contract
We are able to process personal information in order to comply with the contract that we have with you. Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 5.

Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In additional to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

1) Explicit consent of the data subject
2) Necessary for carrying out obligations and exercising specific rights in relation to employment and social security and social protection law
3) Processing relates to personal data which is manifestly made public by the data subject
4) Necessary for establishing, exercising or defending legal claims
5) Necessary for reasons of substantial public interest
6) Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
7) Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of sensitive category personal information that we process is set out in the tables attached.

Who might we share your information with?

We routinely share staff information with:

- our local authority
- the Department for Education (DfE)

We do not share information about our staff unless the law and our policies allow us to do so. Please refer to the tables for information about what personal information is shared with which specific third parties.

What do we do with your information?

All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected. The Academy monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

How long do we keep your information for?

In retaining personal information, the Academy complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the Academy Trust are required to retain the information.
A copy of those schedules can be located using the following link:
http://irms.org.uk/page/SchoolsToolkit

Transferring data internationally

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

What are your rights with respect of your personal information?

Under data protection law, staff members have the right to request access to information about them that we hold. To make a request for your personal information contact the School Data Protection Officer at Warwickshire Legal Services via email at schooldpo@warwickshire.gov.uk or alternatively;
School Data Protection Officer

Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

****Please ensure you specify which school your request relates to**.

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 for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations and
- Subject to the complaints procedure below, you have the right to complain to the ICO

Data Protection Complaints

We are committed to handling your personal data in a way that is fair, transparent, and in accordance with the law. If you are unhappy with how we have handled your data, this process outlines how you can make a complaint.

How to Make a Complaint

If you have a complaint about how your data has been handled, please contact our Data Protection Lead (DPL) or our Data Protection Officer (DPO). This allows us to investigate and resolve the issue as quickly as possible.

- School DPL Email: head@suckley.worcs.sch.uk
- School DPO: Schooldpo@warwickshire.gov.uk

When you contact us, please provide as much detail as possible about your complaint. This will help us to understand the issue and investigate it thoroughly.

What to Expect from Us

We will acknowledge receipt of your complaint within 30 days. We will, without undue delay, take appropriate steps to respond to your complaint, including making appropriate enquires. Throughout the process, we will:

- Keep you informed of our progress.
- Request any additional information we may need from you in a timely and proportionate manner.
- Provide you with a clear and comprehensive outcome of our investigation.

If You Remain Unhappy

If you are not satisfied with the outcome of your complaint, or if you feel we have not handled it appropriately, you have the right to complain to the Information Commissioner's Office (ICO). The ICO is the UK's independent regulator for data protection and information rights.
For more information about the ICO and their complaints process, you can visit their website at ico.org.uk.

Review

The content of this Privacy Notice will be reviewed June 2027

Table 1 – Personal information we are required to process to **comply with the law**:

Information Type	**Relevant legislation**	**Special Category– additional lawful reason**	**Third Parties with whom we share the information**	**Lawful reason for sharing**
Staff information, including personal details, N.I number, DBS checks, qualifications, verification of right to work in the U.K	*Education Act 2005, Section 114 and accompanying regulations*		*Secretary of State, Worcestershire County Council, Disclosure & Barring Service*	*Legal Obligation*
School workforce Census including staff personal details	*Education Act 2005, Section 114 and accompanying regulations*		*Department of Education*	*Legal Obligation*
School workforce Census – Staff Ethnicity	*Education Act 2005, Section 114 and accompanying regulations*	*Consent*	*Department of Education*	*Legal Obligation*
Accident Records	*Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 (RIDDOR)*		*Health & Safety Executive, and Local Authority Health & Safety team (where necessary)*	*Legal Obligation*
Individual Staff Health & Safety Risk Assessments and Personal Emergency Evacuation Plans (PEEP)	*Health and Safety at Work etc Act 1974 and accompanying legislation*		*Not shared externally*	
Qualifying Complaint Information	*Education Act 2005, Section 11B*		*Chief Inspector*	*Legal Obligation*
Verification of Right to work in the U.K (Single Central Record)	*Immigration, Asylum and Nationality Act 2006, Section 15*		*Local Authority, Ofsted*	*Legal Obligation*

Table 2 – Personal information we are required to process as it is necessary to protect someone's **vital interests**

Information Type	**Special Category - additional lawful reason**	**Third Parties with whom we share the information**	**Lawful reason for sharing**
Medical Information	*Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent OR Necessary for preventative/ occupational medicine*	*Medical staff i.e. paramedics/ambulance Responsible/First aid trained staff on residential trips*	*Vital Interest*
Staff Dietary Requirements (food allergies)	*Necessary for preventative/ occupational medicine*	*Medical staff i.e. paramedics/ambulance*	*Vital Interest*
Medical Conditions & Staff Emergency Contact Details	*Necessary for preventative/ occupational medicine*	*Medical staff i.e. paramedics/ambulance Responsible/First aid trained staff on residential trips*	*Vital Interest*
Religious belief	*Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent*	*Medical staff i.e. paramedics/ambulance*	*Vital Interest*

Table 3 - Personal information we are required to process with the **consent** of the individual to whom that information 'belongs'

Information Type	**Third Parties with whom we share the information**	**Lawful reason for sharing**
Photographs	*Local Press/Media, Staff Noticeboard, Parents & Community (Newsletter, School Website, Twitter, Annual Prospectus, Internal school displays, staff photo board).*	*Consent*
Staff Email address and mobile number	*Parents, and other members of staff*	*Public Task*

Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a **public task**

Information Type	**Special Category - additional lawful reason**	**Third Parties with whom we share the information**	**Lawful reason for sharing**
Attendance Records at staff meetings and staff training		*Not shared externally*	*Public Task*
Staff personal characteristics i.e Religion/Gender/Ethnicity	*Consent*	*Local Authority – Confidential Recruitment Monitoring, Diocesan Education Service annual census*	*Public Task & Statistical Purposes*
Medical Conditions (including allergies)	*Necessary for preventive or occupational medicine.*	*Medical staff i.e. paramedics/ambulance,*	*Vital Interests*

Table 5 - Personal information we are required to process because of a contract we have with you or because you have asked us to take specific steps before entering into a contract

Information Type	**Third Parties with whom we share the information**	**Lawful reason for sharing**
Recruitment Information – Application forms, interview notes, Medical questionnaires & references	*Local Authority & Ofsted*	*Public Task / Legal Obligation*
Absence Records (including number of absences, reasons for absence & self-certifications forms)	*Local Authority – HR & Payroll Team*	*Public Task*
Disciplinary action taken	*Local Authority – HR advisory team where relevant*	*Public Task*
Grievances	*Local Authority – HR advisory team where relevant*	*Public Task*
Staff Information i.e name D.O.B, address, contact details, Emergency contact details	*Department of Education – school workforce census.*	*Legal Obligation*
P45 Forms	*Local Authority – HR & Payroll team*	*Public Task*
Consent Forms i.e GDPR, Policy Agreement	*Not shared externally*	
Staff personal bank details	*Local Authority requirement for Payroll System*	*Contract*
Appraisal Records, appraisal notes, feedback from colleagues, objectives, updated job descriptions, pay & promotion recommendations	*Not shared externally*	
Staff information, including personal details, N.I number, DBS, Address, Phone number.	*Secretary of State, Worcestershire County Council, Disclosure & Barring Service,*	*Legal Obligation*