



# Privacy Statement – Staff Workforce

Based on the DfE model privacy statement – September 2026

## Version History

|       |                |                                                                                                                                                                                                   |
|-------|----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| V26.1 | September 2026 | Updated against the DfE 2026 model policy. Updated ICO complaint wording; aligned terminology; updated the DfE subject access section and contact link. Updated Article 6 and Article 9 sections. |
| V25.1 | September 2025 | General review of resource.                                                                                                                                                                       |

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|-------|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |             | <p>Within the 'How government uses your data' section, the 'Sharing by the DfE' section has been updated based on current wording used within the DfE model privacy notice.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| V24.2 | August 2024 | <p>Amendments to DfE model staff privacy notice applied within this template as follows:</p> <p><b>Why we share school workforce information</b><br/>Added in a link to view the DfE's privacy notice.</p> <p><b>Requesting access to your personal data</b><br/>Updated the wording to match the DfE description of the data protection rights individuals hold and that there may be legitimate reasons why an information request may be refused.</p> <p><b>How Government uses your data – Sharing by the DfE</b><br/>Added in a link to view the DfE's privacy notice and added in a link to view organisations that the DfE shares data with.</p> <p><b>How Government uses your data – How to find out what data the DfE holds about you</b><br/>Added in additional link to where individuals can find out more about submitting an information request to the DfE.</p> |

## Privacy Notice (How we use school workforce information)

This privacy notice explains how we collect, process and manage information for the school workforce. That includes employed members of staff, volunteers, trainee teachers, apprentices and work experience/workplace placements.

Buttsbury Primary School is the data controller for the use of personal data in this privacy notice.

### The categories of school workforce information that we collect process

These include:

- personal information (such as name, employee or teacher number, national insurance number, address)
- characteristics information (such as sex, age, ethnic group)
- contract information (such as start date, hours worked, post, roles and salary information)
- payroll information
- work absence information (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught)
- medical information
- other personal information
- references

The list is not exhaustive, to access the current list of categories of information we process please contact the school office.

### Why we collect and use workforce information

We share information to comply with statutory, regulatory and contractual obligations. These may include, but are not limited 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
- allowing better financial modelling and planning
- enabling ethnicity and disability monitoring
- supporting the work of the School Teachers' Review Body
- comply with guidance such as 'Working Together' and safeguarding obligations
- facilitating good governance
- internal reviews and quality monitoring
- CPD and staffing issues
- fulfilling our duty of care towards our workforce during a medical or mental health emergency

If we are required to comply with other legal obligations not listed above, we will share data only when it is lawful to do so.

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) to communicate with staff via Parentmail
- e) to enable staff to pay for items eg school dinners via Parentpay

## The lawful basis on which we process this information

**Under the UK GDPR, we rely on the following lawful bases when processing workforce information:**

- For the purposes of recruitment, managing employment contracts, payroll, pensions, attendance, performance and professional development, in accordance with the legal bases of Article 6(1)(b) - performance of a contract - and Article 6(1)(c) - compliance with a legal obligation.
- For the purposes of school administration, workforce planning, governance, safeguarding and statutory reporting, including the School Workforce Census, in accordance with the legal bases of Article 6(1)(c) - compliance with a legal obligation - and Article 6(1)(e) - performance of a task in the public interest or exercise of official authority.
- For the purpose of responding to a medical or other emergency, in accordance with the legal basis of Article 6(1)(d) - protection of the vital interests of the individual or another person.
- For the purpose of genuinely optional processing, in accordance with the legal basis of Article 6(1)(a) - consent. Where we rely on consent, it may be withdrawn at any time

**In addition, concerning any special category data:**

- For the purposes of meeting employment, equality, social security and social-protection obligations, in accordance with Article 9(2)(b) and Schedule 1, Part 1, paragraph 1 of the Data Protection Act 2018.
- For the purposes of managing sickness absence, occupational health, fitness for work and workplace adjustments, in accordance with Article 9(2)(b) and, where appropriate, Article 9(2)(h).
- For the purposes of equality monitoring, statutory reporting and safeguarding children or individuals at risk, in accordance with Article 9(2)(g) and the relevant conditions in Schedule 1, Part 2 of the Data Protection Act 2018, including paragraphs 6, 8 and 18.
- Where applicable, we may also rely on Article 9(2)(a) for explicit consent, Article 9(2)(c) for vital interests, or Article 9(2)(f) for the establishment, exercise or defence of legal claims.

Criminal-offence and DBS information is not special-category data under Article 9. It is processed separately under Article 10 of the UK GDPR and the Data Protection Act 2018, using an Article 6 lawful basis and an applicable Schedule 1 condition, normally in connection with employment, safeguarding, preventing unlawful acts or protecting the public. Access is restricted to authorised staff.

## Collecting workforce information

We collect personal information from new staff via Personal Information Forms and update annually staff information via Data Collection Sheets.

Workforce data is essential for the school's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it is provided to us 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 data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please visit Buttsbury Primary School website [Buttsbury Primary School - Data Protection](#)

## Who we share workforce information with

We routinely share this information with:

- our local authority
- the Department for Education (DfE)
- safeguarding and protection for children and vulnerable adults
- payroll services
- legal advisers
- insurance providers
- HMRC
- Teacher Pension Scheme and the Local Government Pension Scheme (and other pension providers)
- health professionals
- authorised third parties e.g. Parentmail, Parentpay, Google Classroom (a full list can be obtained from the school office), where contractual assurances are made that data will be kept securely.

## 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)

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 with the Department for Education (DfE) for the purpose of those data collections, under:

#### School Workforce Census

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

We are required to share information about our school employees with the (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 of this privacy notice.

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>.

Data protection law allows us to share personal information in an urgent or emergency situation, including to help prevent loss of life or serious physical, emotional or mental harm. During a medical emergency, including a mental health emergency, where there is risk of serious harm to one of our workforce or to others we will share necessary and proportionate information without delay with relevant and appropriate emergency services or health professionals. We may also share necessary and proportionate information with an employee's next of kin or emergency contact. We will use our judgement in each specific situation, sharing only what is necessary and proportionate to the circumstances.

## Requesting access to your personal data

The UK GDPR gives you certain rights in relation to how your information is collected and used. To make a request concerning your personal information, contact the Buttsbury Primary School office.

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 have the right to object, but you have the right to withdraw consent.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at [raise a concern with 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 Buttsbury Primary School Office.

## **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 September 2026.

## **Further information**

If you would like to discuss anything in this privacy notice, please contact Buttsbury Primary School Office

## **More information about Data Protection and our Policies**

How we manage the data and our responsibilities to look after and share data is explained in our Data Protection policy and connected policies which are also available on our website.

## **How Government uses your data**

The workforce data that we lawfully share with the Department for Education (DfE) through data collections:

- informs 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 of 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'. See the guide for details:

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

Further information on what personal information the Department for Education (DfE) holds about you is published in the privacy notice for education providers' workforce, including teachers. This is available below:

<https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers>

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

### **Data Protection Officer**

Our Data Protection Officer is SBM Services (UK) Limited, contact details 01206 671103 or e-mail [info@sbmservices.co.uk](mailto:info@sbmservices.co.uk)