

Employees Privacy Notice

Under the data protection law ([the General Data Protection Regulation](#)), individuals have a right to be informed about how the Trust uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **our Employees**.

Primitas Learning Partnership, C/O Greywood Primary Academy, Baker Way, Lichfield, WS14 9QF, Tel: 01543 229937 is the 'data controller' for the purposes of data protection law and is responsible for how employee personal information is processed and for what purposes.

Primitas Learning Partnership is registered for this purpose with the Information Commissioner's Office (ICO).

The Data Protection Officer (DPO) for Primitas is Jackie Hesslegrave and can be contacted via dpo@primitas.co.uk

The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our Trust. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- personal information (such as name, date of birth, employee or teacher number, national insurance number, proof of ID via passport, driving license, marriage certificate, birth certificate)
- characteristics information (such as gender, 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 employment records qualifications held where relevant, subjects taught, work history, working hours, training records and professional memberships)
- Photographs
- Contact details (such as addresses, email, telephone, contact preferences, date of birth, identification documents, next of kin & emergency contact numbers)
- payroll information (such as bank account details, payroll records, NI number, tax status information)
- Recruitment information (such as including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)
- Performance information

- Disciplinary information (such as outcomes of any disciplinary and/or grievance procedures)
- CCTV footage
- Data about your use of the Trust's information and communications system
- Data regarding attendance via signing in and out systems
- Data relating to work logs on electronic management systems e.g. iAMCompliant

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade Union membership
- Biometric data such as finger prints for school canteen or face recognition for Laptops (in selective schools only - please see the school office)
- Criminal data, provided as part of our recruitment process application
- Health, including any medical conditions, sickness records and allergies.

Why we use this data

The purpose of processing this data is to help us run the Trust, including 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 in line with safeguarding responsibilities and statutory obligations to check the Right to Work in the UK
- Support effective performance management
- Allow better financial modelling and planning
- Carry out research
- Assess the quality of our services
- Accessing online payment gateways
- Enable gender, minority and disability monitoring
- To make sure our information and communications systems, equipment and facilities are used appropriately, legally and safely

Use of personal data in automated decision-making and profiling

We do not currently process any staff members' personal data through automated decision-making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing including the right to object to it.

Use of your personal data for filtering and monitoring purposes

We may monitor your use of our information and communication systems, equipment and facilities (e.g. Academy computers).

We do this so that we can;

- Comply with Health and Safety and other legal obligations
- Comply with our policies (e.g. Child protection and IT acceptable use policies and our legal obligations)
- Keep our networks and devices safe from unauthorised access and prevent malicious software from harming our networks
- Protect staff welfare

Our lawful basis for using this data

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

- To fulfil a contract we have entered into with you (Payroll, Pension services)
- To comply with a legal obligation, the lawful basis for processing school workforce information is to fulfil contractual obligations and other legitimate interests. The Education Act 2005, Tax Law, KCSiE, Immigration, Asylum and Nationality Act 2006,
- To fulfil our Statutory obligations for data collection purposes (Departmental Censuses) following the provisions of the Education Act 1996
- To carry out a task in the public interest in providing education to children following the provisions of the Education Act 1996 this includes of personal and contractual information with the DfE, Local Authority, Contractors, HMRC.
- To comply with Health and Safety obligations under the Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 (RIDDOR), Health and Safety at Work Act 1974

In addition, concerning any special category data:

- You have given us consent to use it in a certain way (examples include minority monitoring, health information, photographs and biometrics)

We need to protect your vital interests (or someone else's interests) and ensure that we can act in an emergency (examples include medical information, contact information, allergies, religious beliefs) Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the Trust's use of your data.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Collecting this information

We collect personal information via application forms, contracts, data collection forms and internal surveys.

Workforce data is essential for the Trust's, Academy's and 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 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 and we will tell you what you need to do if you do not want to share this information with us.

How we store this data

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 detailed in our Data Protection Policy, please visit our [Policies](#) page.

Data sharing

We do not share information about employees with any third party without consent unless the law and our policies or internal procedures allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information with the following organisations/providers:

- **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 School Workforce) (England) Regulations 2007 and amendments.

Information shared may include information relating to safeguarding concerns.

- **Department for Education**

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

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.

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>.

Information shared includes employment records and workforce census data.

- **Professional Health Bodies – Public Health England**
- Public Health England has special permission from the Secretary of State for Health and Social Care to use personally identifiable information without people's consent where this is in the public interest and example of this is the NHS Track and Trace used in the coronavirus pandemic. **Ofsted**

To provide information to our regulator to support their evaluative work of our provision such as staffing levels and safer recruitment checks.

- **Suppliers and service providers**

To enable them to provide the service we have contracted them for such as pension services and payroll.

- **Financial organisations / Government funding department / Auditors**

To enable them to provide financial support and to support the analysis and evaluation to assist academies in securing the best possible provision.

- **Trade Unions & Associations**

To provide information to facilitate trade union support such as in disciplinary matters or formal employee relations matters.

- **Survey & Research Organisations**

To provide information to support education related evaluation and to inform teaching and learning approaches e.g. employment details to the office of National Statistics or to support academy self-evaluation.

- **Security organisations**

To enable providers to maintain security and safety for all staff, such as biometric data for canteen services.

- **Welfare organisations**

To enable welfare providers to effectively deliver key provision to staff such as counselling services.

- **Professional consultants**

To provide information to support staff welfare and delivery, such as Occupational Health Professionals or Teaching Trainer bodies.

- **Judiciary and Policing Bodies**

To meet our legal obligations to share certain information with it such as criminal concerns or legislative matters.

- **Professional Bodies**

To provide information to support school self evaluation and to inform teaching, learning and pastoral approaches.

- **Prospective Employment and recruitment agencies**

To provide information relating to length of service and professional conduct such as for references. Please note references are provided in Confidence.

Transferring data internationally

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

Your rights

Individuals have a right to make a ‘**subject access request**’ to gain access to personal information that the Trust holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request [click here to find all the information you require.](#)

Your other rights regarding your data

Depending on the lawful basis above, you may 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
- a right to seek redress, either through the ICO, or through the courts

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

For further information on how to request access to personal information held centrally by DfE, please see the '[How Government uses your data](#)' section of this notice.

To exercise any of these rights, please contact our [Data Protection Officer](#)

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 following our complaints procedure](#).

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 in January 2026 .

Contact us

If you would like to discuss anything in this privacy notice, please contact our [Data Protection Officer](#)

How Government uses your data

The workforce data that we lawfully 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

Data collection requirements

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>.

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/departments-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>