Policy Name	**PRIVACY NOTICE – EMPLOYEES**
Relevant To	**Federation ☒** **Bidwell Brook Only ☐** **Ellen Tinkham Only ☐**
Policy Type	**Model ☒** **School ☐**
Name of Holder	**Christine Walker**
Subject/Department	**Data Protection**
Approved By	**Full Governing Body ☐** **CBT Governors ☒** **T&L Governors ☐** **SLT ☐**
Version Date (if applicable)	**v2 August 2025**
Date of Last Review	**Autumn Term 2026**
Date of Next Review	**Autumn Term 2027**

1. Purpose of this Notice

Under data protection law, individuals have a right to be informed about how the school 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 Notice explains how we collect, use and share personal information about individuals employed to work at the Learn to Live Federation in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data Use & Access Act 2025, henceforth collectively known as 'data protection legislation'.

We will comply with the data protection principles when gathering and using personal information as set out in our Data Protection Policy and are committed to protecting the privacy and security of our employees' personal information.

2. Data Controller

As a public authority, we are a 'data controller' which means that we are responsible for deciding how we hold and use personal information about you.

The Learn to Live Federation is known as the 'Data Controller' for data protection legislation purposes and is registered with the Information Commissioner's Office (ICO) under registration number ZC081975.

3. What data we collect

We may collect and process the following personal data:

- personal identifiers (eg full name, National Insurance number, teacher number)
- date of birth
- contact details including home address, email address and telephone number
- characteristics (gender, age, ethnicity, religious beliefs)
- car registration number (where applicable)
- recruitment information (eg job application; qualifications, training and employment history)
- right to work evidence
- employment and safeguarding checks (Disclosure and Barring Service information)
- references
- contract and employment information (eg start dates, hours worked, post, roles, salary information, appraisal and disciplinary information)
- next of kin and emergency contacts
- images (these may be captured during official school photos; class work; activities, performances or on school CCTV)
- details about equipment assigned to an employee
- allegations or concerns about child protection or safety
- work absence and attendance records (such as the number of absences and their reasons, fitness to work and occupational health information)

- disability, medical, health and dietary information (where relevant)
- Disclosure and Barring Service (DBS) information
- facial photograph for use on identification badges
- payroll and pension information such as bank account and tax details

4. Why we collect this data

We collect this data to:

- manage employment contracts
- monitor absence and performance
- support training and development
- recruit, retain, train, appraise, manage the welfare and performance of staff
- enable individuals to be paid, pension contributions made, and tax and NI deducted
- provide employee services and benefits (such as childcare vouchers and pensions)
- enable the development of a comprehensive picture of the workforce and how it is deployed
- communicate with employees regarding work related matters
- comply with the law regarding data sharing
- maintain staff records
- provide library, ICT, learning and information services
- assess the quality of our services
- assist in the prevention and detection of crime
- promote the school and its activities
- carry out audits (eg to ensure compliance with our legal obligations)
- deal with complaints, grievances and disciplinary action
- comply with legal obligations (eg HMRC, DfE school workforce census)
- administer school trips and activities
- monitor and comply with our responsibilities under the Equality Act 2010
- ensure staff and student safety and security
- provide catering and payment services
- ensure safeguarding, duty of care, and monitoring the health and welfare of our employees

5. Legal Basis for processing

When processing personal data about our employees, we rely upon the following legal bases, which are set out in Article 6 of the UK GDPR.

- it is necessary for us to perform a task carried out in the public interest or in the exercise of our official duties (eg education provision)
- it is necessary for us to comply with a specific legal obligation (eg employment law, tax law)
- it is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject, prior to entering into a contract
- the data subject has provided their consent
- it is necessary to protect the vital interests of a person (eg emergency medical care)

When we process special category data about our employees, we rely on one or more of the following additional legal bases, as set out in Article 9 of the UK GDPR:

- the data subject has given us their explicit consent
- it is necessary for us to carry out our obligations and exercise our or the data subject's specific rights relating to employment, employment law, social security and social protection law
- processing is necessary to protect the vital interests of a person where the data subject is physically or legally incapable of giving consent
- it is necessary for the establishment, exercise or defence of a legal claim
- it is necessary for the assessment of the working capacity of an employee
- it is necessary for reasons of substantial public interest

Other legal bases listed in Article 9 of the UK GDPR may also apply, depending on the processing required.

6. Who do we share data with and why?

Department for Education (DfE) - We are required to share workforce information (this is known as the workforce census) with the DfE, so they can fulfil their statutory obligations relating to data collection. We are required to share information about our school employees with the DfE under Regulation 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

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 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. For information about how the DfE collects and shares workforce data for research purposes, visit their website at https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data

Our Local Authority - We may be required to share information about our employees with our local authority under Regulation 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Other - We may also need to share personal data with payroll and pension providers, Occupational Health services, IT and HR system providers and regulatory bodies (eg Ofsted, DBS).

In all cases, we will take reasonable steps to ensure that all third parties comply with UK data protection legislation.

7. Retention Periods

Except as otherwise permitted or required by applicable law or regulation, we will only retain personal data for as long as necessary to fulfil the purposes we collected it for as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

Full details on how long we will retain your personal data for is set out in our Records Retention Schedule available on our website.

Data is securely deleted when no longer needed.

8. Security of your Information

We have put in place measures to protect the security of your information (ie to prevent it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

Third parties will only process your personal information on our instructions and where they have agreed to treat information confidentially and to keep it secure.

We have put in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office of a suspected breach where we are legally required to do so.

9. International Transfers

Every effort is taken to try and use third party suppliers within the boundaries of the European Economic Area (EEA) to ensure the data protection rights of individuals. However, there may be occasions where the system supplied by an organisation is outside of the EEA for example the United States. Where personal data is transferred outside the UK or EEA to a country that is not designated as 'adequate' in relation to data protection law, we will ensure the personal data is adequately protected using International Data Transfer Agreements, appropriate security measures, and other appropriate safeguards.

10. Your data protection rights

Your right of access - You have the right to ask us for copies of your personal data. There are some exemptions, which means you may not always receive all the information we process.

Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing - You have the right to object to us processing your information where we consider this is necessary for us to perform a task in the public interest. You can also object to us using your contact details to send you direct marketing or fundraising communications.

Your right to data portability - This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information based on your consent or under a contract (or in talks about entering into a contract) and the processing is automated.

Your right to complain - We work to high standards when it comes to processing your personal information. We hope you will always be happy with the way we handle your data so if we have not met your expectations, please let us know so we can put things right. Please contact the Federation HR Manager, Sarah Bedford, sbedford@bidwellbrook.devon.sch.uk who will notify Nikki Burroughs, Executive Head via email – nikki.burroughs@learntolivefederation.co.uk.

We take any formal complaints about our data collection and use of personal information very seriously. Under the Data Use and Access Act 2025, any complaints to ourselves as the "Data Controller" must be acknowledged within 30 days followed by an investigation and response. Please bear in mind these timescales may be difficult for us to achieve should you submit your complaint either just before or during a school holiday. However, we will do our best to keep you informed about when you can expect us to respond to you.

Further details about our data complaints process can be found in the Data Protection Complaints Policy, along with a form for you to complete. This policy is available to download on our school websites and you are not required to pay a charge for exercising your rights.

After receiving the response to our investigation, if you still remain dissatisfied, you have the right to complain to the Information Commissioner's Office (ICO). The ICO's contact details are available at https://ico.org.uk/concerns Further information about your data protection rights, can be found on the Information Commissioner's Office website at www.ico.org.

11. Further information

If you have any queries about this privacy notice, or the way your personal information is being handled by the school, see our Data Protection Policy which is publicly available on our website or contact our Data Protection Officer, Jenny Goodall at Devon County Council.

12. Updates to this Notice

We will update this notice periodically. The latest version will always be available on our website and we will notify you when any changes are made.