

Privacy Notice (How we use nursery, school and central team workforce information)

Stour Vale Academy Trust collects and processes personal data relating to its employees to manage the employment relationship. Stour Vale Academy Trust is committed to being transparent about how it collects and uses the data and to meeting its data protection obligations. This privacy notice will inform you about why Stour Vale Academy Trust and your individual setting (nursery/school/central team), as joint data controllers, collect and process a range of information about you.

The categories of workforce information that we collect, process, hold and share include:

- personal information (such as name, address and contact details, employee or teacher number, details of your bank, national insurance number, information about your marital status, nationality, next of kin, dependants and emergency contacts);
- copies of your identification documents;
- your photograph (where we are not relying on your consent to use the data, e.g. for your staff ID badge);
- special categories of data including characteristics information (such as gender, age, ethnic group, religion and sexual orientation);
- contract information (such as start dates, terms and conditions of your employment, hours worked, post, roles and salary information, information about entitlement to benefits such as pensions, information about your nationality, entitlement to work in the UK and periods spent outside the UK);
- work absence information (such as number of absences and reasons);
- qualifications (such as skills, experience and employment history, where relevant, subjects taught);
- information about your membership of professional bodies;
- information about your trade union membership;
- details of driving licence (if relevant to the role);
- information about your criminal record;
- information about your DBS status (date of check and certificate number);
- details of any disciplinary or grievance procedures in which you have been involved (such as any warnings issued to you and related correspondence);
- assessments of your performance (such as appraisals, performance reviews, performance improvement plans and related correspondence);
- training records;

- annual declarations;
- information about medical or health conditions (such as whether or not you have a disability for which the organisation needs to make reasonable adjustments);
- whether you are related to any pupil, employee, member, trustee or local governor within the Trust; and
- information about your use of the Trust's information and communication systems.

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;
- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that Stour Vale Academy Trust complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;
- provide references on request for current or former employees;
- respond to and defend against legal claims;
- maintain and promote equality in the workplace;
- monitor and quality assure ECT induction;
- carry out teacher training.

We may use artificial intelligence (AI) to support workforce administration, recruitment, and data analysis. This processing is carried out in line with our legal obligations and public task in delivering education services. AI tools assist

staff but do not replace professional judgement, particularly in safeguarding and employment decisions. We do not make solely automated decisions that have a significant impact on individuals without informing them and providing appropriate safeguards. All AI use is subject to human oversight, data protection controls, and strict security measures. Where applicable, the Trust will undertake a data protection impact assessment.

Some special categories of personal data, such as information about health or medical conditions, are processed to carry out employment law obligations (such as those in relation to employees with disabilities).

The lawful basis on which we process this information

We process this information under the following UK General Data Protection Articles:

Article 6.1 (b) Processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract

Article 6.1 (c) Processing is necessary for compliance with a legal obligation to which the controller is subject

For example: The Health and Safety at Work Act, Equality Act 2010, The Disability Discrimination Act

Article 6.1 (e) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

For example: The Education Act requires the collection of workforce data for the purpose of Departmental Census. Working together to Safeguard Children Guidelines (DfE).

Article 6.1 (f) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child

For example: Where images are captured via recording of video conferencing for online lessons and similar. A Legitimate Interest Test (LIT) will be carried out before processing takes place.

Article 9.2 (b) Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by domestic law or a collective agreement pursuant to domestic law providing for appropriate safeguards for the fundamental rights

and the interests of the data subject

For example: Where statutory sick pay records are maintained.

Article 9.2 (g) Processing is necessary for reasons of substantial public interest, and is authorised by domestic law

For example: Where a substantial public interest condition, such as the requirement to share data with law enforcement agencies to prevent or detect unlawful acts, applies.

Collecting workforce information

Stour Vale Academy Trust collects personal information in a variety of ways. For example, data might be collected through application forms; obtained from your passport or other identification documents such as your driving licence; from forms completed by you at the start of or during employment; from correspondence with you; or through interviews, meetings or other assessment.

In some cases, Stour Vale Academy Trust may collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law.

Workforce data is essential for the Trust's/nursery's/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 and appropriate consent will be sought, e.g. when capturing/using staff photos for certain identified purposes. In order to comply with data protection legislation, 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.

Storing this 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 [IRMS Toolkit for Academies](#).

Detailed information about how we ensure the safe use of data can be found in our policies:

- [Data Protection Policy](#)
- [Information and Cyber Security Policy](#)
- [Data Retention Policy](#)
- ICT Acceptable Use Policy
- Newtown Staff SharePoint

Who we share this information with

Your information may be shared internally, including with those people responsible for HR and recruitment (including payroll), senior staff who you report to or who have supervisory/management responsibilities for you and business support and IT staff if access to the data is necessary for performance of their roles.

Stour Vale Academy Trust routinely shares this information with:

- our local authority
- the Department for Education (DfE)
- MyNewTerm
- iTrent/Neo People Management
- School MIS (*this may be SIMS or Arbor depending on your school*)
- Health Assured
- CareCheck
- Office for National Statistics
- AvePoint
- Civica Education Operations (Parago)
- Evolve Advice
- TES Educare
- Relevant staff within Halesowen College (*central team employees only*)
- Single Central Record
- Papercut
- Microsoft Online Services – Microsoft Office 365
- Microsoft Teams
- YouTube
- Twitter
- Wonde
- Aperture Portraits
- GovernorHub
- Developing Experts
- Sign In App
- Groupcall Xporter
- Facebook
- TES Training Platform
- TeachMateAi
- Twinkl
- Testbase

Why we share 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 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 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.

For privacy information on the data the DfE collects and uses, please see <https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers>

MyNewTerm

We use MyNewTerm for job advertisements, applicant tracking and hiring of individuals in accordance with safer recruitment requirements.

iTrent/Neo People Management

We are required to share information about workforce members with Neo People Management for the purposes of creating employment contracts for successful candidates through the HR information and payroll system iTrent. Information entered into the system is taken from new workforce members' application forms, qualification certificates, next-of-kin information and HMRC starter checklist forms to enable them to be paid. The system is also used to record absences and changes to roles, such as contract type or hours worked.

MIS

We use management information systems for the purposes of recording staff data, including categories of personal information such as contact details.

Health Assured

We offer use of Health Assured's anonymous mental health and wellness support platform and Wisdom App to all staff. We use Health Assured for pre-employment medical clearance and occupational health referrals.

CareCheck

We use CareCheck, an umbrella body authorised by the Home Office, to process DBS applications.

Office for National Statistics

We are required to complete an annual survey of hours and earnings on a sample of workforce members selected by the ONS.

AvePoint

We use AvePoint for secure cloud-to-cloud backup of online information and records held in Office 365, including that relating to workforce members.

Civica Education Operations (Parago)

We use the Parago system for health and safety monitoring, including accident and incident reporting, and for recording annual declarations made.

Evolve Advice

We use the Evolve system for approval of offsite visit arrangements, including visit leader contact details.

TES Educare

We use TES Educare for online training courses to be completed by all workforce members.

Halesowen College

We are required to share DBS information about central team members with Halesowen College, our central team office base, for safeguarding purposes.

Single Central Record

We use the Single Central Record to track safer recruitment checks before the start of employment.

Papercut

We use Papercut in addition to the schools print management solution to process print jobs and the cost for printing.

Microsoft Online Services – Microsoft Office 365

We use Microsoft Office 365 to access E-Mails, One Drive, SharePoint, Teams etc.

Microsoft Teams

We use Microsoft Teams to communicate virtually in online meetings with other fellow children and staff from Newtown Primary School and with people outside of the organisation.

YouTube

We use YouTube to upload videos of the staff to be shared via a link, QR code, Twitter, Facebook, school website or on the schools YouTube channel.

Twitter

We use Twitter to share staff photos/videos on the schools Twitter account.

Wonde

Wonde is used to sync personal data from our MIS with a range of approved applications integrated within its platform.

Aperture Portraits

Aperture Portraits is a photography company used to take staff photos.

GovernorHub

We use GovernorHub to record staff governor information.

Developing Experts

We use Developing Experts to access resources for the teaching of science.

Sign In App

We use Sign In App as an electronic signing in and out system that records entry and exit times for staff.

Groupcall Xporter

Groupcall Xporter is used to sync personal data from our MIS with a range of approved applications within its platform.

Facebook

We use Facebook to share staff photos/videos on the schools Facebook account.

TES Training Platform

We use the TES Training Platform for staff training and development.

TeachMateAi

We use TeachMateAi to support lesson planning and resource creation.

Twinkl

We use Twinkl to access classroom resources and support lesson planning.

Testbase

We use Testbase to access and plan maths resources and to analyse test paper scores.

CCTV

This section of the privacy notice relates to CCTV systems, including, but not limited to, where it has been installed on the outside of some of the buildings. This section applies only to schools/settings that have CCTV systems installed.

What personal information does this service use?

The CCTV system captures images of people and vehicles in and around where a camera is located. Where fixed CCTV cameras are operating, there will be signs clearly displayed. Images captured by CCTV will not be kept for longer than 30 days. However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated.

What is this personal information used for?

We use this personal data for the following reasons:

- a. To increase personal safety of pupils, staff and visitors, and reduce the fear of crime.
- b. To protect the school/setting buildings and their assets.
- c. To support the Police in a bid to deter and detect crime.
- d. To assist in identifying, apprehending and potentially prosecuting offenders.
- e. To protect members of the public and private property.
- f. To assist in managing the school/setting.

What is the lawful basis we are relying on?

We collect and use this information to ensure the school/setting can undertake its remit to educate children ensuring personal safety of pupils, staff and visitors, protecting school/setting buildings and its assets and to assist in managing the school/setting (Article 6(1)(e) of the UK General Data Protection Regulation). The school/setting will use the 'Passport to Compliance', issued by the Surveillance Camera Commissioner, to ensure that the surveillance camera system complies with the Guiding Principles set out in the Surveillance Camera Code of Practice published by the Home Office as a requirement of the Protection of Freedoms Act 2012.

Where has your personal information come from?

The images are captured because you are present in the area which is covered by the CCTV system.

Who will we share this personal information with?

Your personal data is shared securely with the following, where it is both necessary and appropriate to do so:

- Relevant staff within the school/setting
- Our local authority
- The Police

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 your nursery manager/headteacher (CEO for central team members).

Data Use and Access Act 2025 (DUAA)

Under the Data Use and Access Act 2025 (DUAA), schools are required to provide an electronic complaints form for individuals who wish to raise complaints about how their personal data is handled.

If you have a complaint of this type, please complete the DUAA Complaints

Form by clicking on this [link](#).

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 September 2026.

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:

YourIG Data Protection Officer Service
Dudley MBC
The Council House
Dudley
West Midlands
DY1 1HF

Email: YourIGDPOService@dudley.gov.uk

Tel: 01384 815607

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.

The Trust, in line with statutory guidance, will respond to Subject Access Requests within one calendar month. However, if the request is received during the school holiday, we will liaise with you to seek your agreement to treat receipt of the request as being on the first day back at school.

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/>

Contact

If you would like to discuss anything in this privacy notice, please contact:

**YourIG Data Protection Officer Service
Dudley MBC
The Council House
Dudley
West Midlands
DY1 1HF**

Email: YourIGDPOService@dudley.gov.uk

Tel: 01384 815607

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

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; and
- 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 must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

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 DfE hold about you

Under the terms of the UK Data Protection Act 2018, you're entitled to ask the Department:

- 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, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

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