



Privacy Notice

(How we use school workforce information)

September 2026

V12

Hales Valley Trust collects and processes personal data relating to its employees to manage the employment relationship. **Hales Valley 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 **Hales Valley Trust** collects and processes a range of information about you.

The categories of school 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, next of kin, dependants and emergency contacts.)
- Special categories of data including characteristics information (such as gender, age, ethnic group.) 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 and the entitlement to work in 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 criminal record.
- 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 and ratings, performance improvement plans and related correspondence.)
- Information about medical or health conditions (such as whether or not you have a disability for which the organisation needs to make reasonable adjustments.)

Why we collect and use this information

We use school 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 the **Hales Valley 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.

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).

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.

The lawful basis on which we process this information

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

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.

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.

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).

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.

Collecting this information

Hales Valley Trust collects personal information in a variety of ways. For example, data might be collected through application forms, CVs or resumes; obtained from your passport or other identity 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, Hales Valley 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 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. 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 school workforce data in line with the Trust Retention Policy. Data will be stored in a range of different places, including in your personnel file, in the organisation's HR management systems and in other IT systems (including the organisation's email system).

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.

Hales Valley Trust routinely shares this information with:

- Our local authority
- The Department for Education (DfE)
- Prospects Payroll (Payroll services)
- BROMCOM (Bromcom is a cloud-based school Information management system. The system records assessments, attendance, behaviour, student and staff data across individuals, groups, classes and years)
- Our Trust schools
- Inventry (Visitor, staff and pupil signing-in system) (As part of the school's visitor management system we will ask for your name, who you work for, and car registration. We will also record when you arrive and when you leave the school. This information is to ensure that we meet our duty of care under health and safety and the safeguarding of our children. Our data retention period for this information is current year + 6 years. Please note that we will also take a photograph of you, and this will be retained on our visitor management system in order for us to use again should you visit us again. If you would prefer your photograph to be removed from the database once your visit is complete, please advise either our receptionist or your host)
- West Midlands Pension Fund
- Teachers' Pension Scheme
- Employment Check (Government approved online DBS check tool)
- Browne Jacobson Solicitors
- iTrent (HR Software) Management information system, including payroll, contractual and employment information. Date retention in accordance with retention policy.
- Hoge (Cloud based financial management software 2022)
- Loom (Video Messaging)

- Zoom (Video communication system)
- Medicash (EAP)
- E4education (part of Juniper) Staff Intranet
- School Life (recording Covid absences for local authority and public health)
- GovernorHub (Secure Cloud based platform for governance evident and documentation I.e Board meetings, Local Committee meetings across Hales Valley Trust)
- Maitland Medical (Occupational Health Referral)
- Services For Schools (Governance support)
- IRIS connect also now includes AI. AI will be used for analysis of professional development. Only transcriptions are sent to the AI service provider, not video or audio. No data is stored by the AI service provided once the output is complete. IRIS Connect take the view that given it is already storing video, audio and associated data with professional development with the addition of a transcription of the audio they state that this does not affect the way data is being and intended to be processed going forward. IRIS Connect suggest that the lawful basis can remain as public task as teacher professional development is a statutory obligation for schools. YourIG would agree with this view. In terms of the issue of consent from the teachers YourIG are of the view that teachers have to take a positive step to utilise the AI and therefore this covers this requirement.
- RPA (Davies Group) - Risk Protection Assurance - (Liability Insurance provider)
- My New Term - Application Tracking system for internal and External applicants
- Sparta Occupational Health - (Occupational Health Referral)
- Sciba - Scriba is an intelligent clerking tool which uses AI to write minutes of meetings, capturing decisions from a committee or recording actions from and tracking actions. It produces minutes in tailored formats that are designed for the specific requirements of different boards and meetings within the education sector, for example by capturing challenge and accountability.
- Canva- Canva for Education (and all content and media incorporated therein) for educational purposes may be used by schools. In the context of schools this can include using Canva as a platform to produce promotional material, newsletters, school memorabilia for school proms, leavers books, etc.
- Eventbrite- a global, self-service ticketing and marketing platform that enables users to create, promote, and sell tickets for live, in-person, and virtual events.
- Trellis is a hosted system which means that all updates, maintenance and management can be performed in a central location by Trellis Education Limited.
- Microsoft 365 Education including Copilot- Microsoft 365 Education is a productivity suite that provides a suite of applications that can assist with students learning and collaboration. Microsoft 365 builds on top of Office 365 apps such as Word, Excel, PowerPoint, and Outlook and provides enhanced management, security, and compliance tools. In addition, an artificial intelligence tool 'Copilot' is included as part of the M365 Education suite of apps and complements the above tools.

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 about our children and young

people with the Department for 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.

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.

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.
- 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 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.
- 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>

Data Use and Access Act 2025 (DUAA)

Under the Data Use and Access Act 2025 (DUAA), Complaints about data protection matters are handled under our **data protection policy** and in accordance with relevant guidance from the Information Commissioner's Office (ICO). If you have serious concerns, you may wish to contact the ICO directly, but the ICO will usually expect you to have raised your concerns with our Data Protection Officer in the first instance.

If you have a complaint, please refer to the Data Protection Policy available on Lutley Primary School website – [click here](#).

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 Road, Your IG, Data Protection Officer, Dudley MBC at the address below and Ref Hales Valley Trust and your school.

YourIG Data Protection Officer Service
Dudley MBC, 3-5 St James's Road, Dudley, DY1 1HZ

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.

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/>

CCTV

This section of the privacy notice relates to our CCTV System, including, but not limited to, where it has been installed on the outside of some of our buildings.

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 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.

What is the lawful basis we are relying on?

We collect and use this information to ensure the school can undertake its remit to educate children ensuring personal safety of pupils, staff and visitors, protecting school buildings and its assets and to assist in managing the school (Article 6(1)(e) of the General Data Protection Regulation). The school 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.
- Our local authority.
- The Police.

Further information

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

YourIG Data Protection Officer Service

Dudley MBC, 3-5 St James's Road, Dudley, DY1 1HZ

Email: YourIGDPOService@dudley.gov.uk

Tel: 01384 815607

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 August 2026.