

Woodlands Secondary School	Privacy Notice for workforce (How we use workforce information)	
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Date	Review Date	Author	Nominated Governors
January 2026	January 2027	SPT Compliance	Governing Board
Website	Statutory Policy	Source	Ratification Date
Yes	Yes	SPT Compliance	2/2/2026

Woodlands Secondary School is the Data Controller for the use of personal data in this privacy notice.

Our Data Protection Office is Paula Creighton and can be contacted at paula.creighton@sptcompliance.co.uk

Under General Data Protection Regulation (UK GDPR) we are obliged to inform you of the information that we hold on you as our employees, including what we use it for, who we share it with, and for how long we keep it. This privacy notice aims to provide you with this information.

The categories of school information that we process

These include:

- 1) personal information (such as name, employee or teacher number, national insurance number, proof of right to work, DBS, barred list checks and risk assessments (where appropriate), Prohibition order checks (teachers, HLTAS, UQTS), S128 checks (governors), overseas letter of good conduct (where applicable), disability and health information
- 2) criminal convictions
- 3) contact information (such as address, email address, telephone number, emergency contact information)
- 4) characteristics information (such as gender, age, ethnic group)
- 5) contract information (such as start date, hours worked, post, roles and salary information)
- 6) work absence information (such as number of absences and reasons)
- 7) health, safety and wellbeing information (medical information, occupational health records, incident reports)
- 8) qualifications
- 9) staff training records (details of mandatory and optional training completed by staff, such as safeguarding, first aid, and subject-specific training)
- 10) performance and appraisal information

- 11) IT and system access information to school systems, databases, and networks, including usernames, passwords, and permission levels.
- 12) Grievances, complaints, low level concerns and disciplinary investigations (details of complaint /low level concern documents, investigation notes, resolution records)

This list is not exhaustive.

Why we collect and use workforce information

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) provide payroll and pension services
- d) enable individuals to be paid
- e) complete statutory returns
- f) support staff performance management, training and development
- g) support the health, safety and wellbeing of staff manage and reduce sickness and improve health
- h) provide learning and development opportunities
- i) information we collect may be used to instigate or resolve disciplinary action
- j) fulfil our duty to publish information about protected characteristics as part of Public Sector Equality Duty
- k) ensure safeguarding of pupils and staff

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

For the purpose of:

- for the purposes of **g** in accordance with the legal basis of **consent**
- for the purposes of **d, f, i** in accordance with the legal basis of **contract**
- for the purposes of **c, e, g, j, k**, in accordance with the legal basis of **legal obligation**
- for the purposes of **a, b, g, h**, in accordance with the legal basis of **public task**

Consent - Article 6 (a)

For the purposes of processing workforce information where we have explicit consent. Consent can be withdrawn at any time.

Contract Article 6 (b)

for the purposes of entering into and performing employment contracts, including recruitment, payroll, pensions, benefits, absence management, performance management, and ending employment where applicable.

Legal obligation - Article 6 (c)

For the purposes of meeting our duties as an employer and education provider, including payroll, safeguarding, employment checks and statutory data returns, in accordance with legislation such as:

- Education Act 1996
- Education Act 2002
- Children Act 2004
- School Information (England) Regulations 2005
- Keeping Children Safe in Education (statutory guidance)
- Employment and equality legislation

Public task - Article 6 (e)

For the purposes of carrying out tasks in the public interest and in the exercise of official authority vested in the school, including the management of the school workforce and the provision of education.

In addition, concerning any special category data, we rely on the following conditions of UK GDPR **Article 9**:

- **Article 9(2)(b)** – processing is necessary for the purposes of carrying out obligations and exercising specific rights in the field of employment and social security law
- **Article 9(2)(g)** – processing is necessary for reasons of substantial public interest, including safeguarding of children and individuals at risk and equality of opportunity
- **Article 9(2)(h)** – processing is necessary for occupational health and the assessment of working capacity of employees

Some of the information we collect and use is provided with your consent and that is the lawful basis for us processing it. We will make it clear where we are asking for your consent, why, and provide you with the opportunity to refuse to provide us with that information, explaining what the consequence of that will be.

Collecting workforce information

We collect personal information via:

- Job application forms
- Employment contract forms
- Background checks (DBS, References, Right to work, Prohibition order checks, Sections 128 checks (governors, Letter of good conduct)
- Right to work documentation
- Medical questionnaires and health forms
- Attendance and absence records
- Appraisal documentation
- Employee surveys and feedback forms

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 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 see the Data Retention Policy and schedule on **N:\POLICIES AND PROCEDURES\10. GDPR\Data Retention Policy**.

Who we share workforce information with

We routinely share this information with:

- our local authority (where applicable)
- the Department for Education (DfE)
- external training providers
- health providers
- payroll and pension providers

- legal and regulatory bodies (compliance with legal requirements, investigations, and safeguarding or employment law matters.)
- statutory bodies for safeguarding e.g. police, social services (reporting and investigating safeguarding concerns as required by law.)

Why we share school workforce information

We do not share information about our workforce members with anyone without consent unless the law and our policies allow us to do so.

We share workforce data for the following reasons:

- comply with statutory reporting requirements (e.g. safeguarding and child protection, health, safety and risk management)
- prevent or detect crime
- support trade union membership
- provide training opportunities
- ensure employees have access to relevant external services which support wellbeing
- to ensure accurate and timely payroll processing, tax compliance, and pension contributions.
- to manage insurance coverage, process claims for work-related injuries or illnesses, and comply with liability and compensation regulations.
- to ensure compliance with employment laws, respond to legal requests, or participate in investigations and audits.
- to protect the school's IT infrastructure and ensure data security.

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.

School workforce census:

We are required to share information about our school employees with the Department for Education (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.

Requesting access to your personal data

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 the GDPR Lead at: schooloffice@woodlands.luton.sch.uk

You also have the right to:

- to ask us for access to information about you that we hold
- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)

- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

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 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 the Headteacher.

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

If you would like to discuss anything in this privacy notice, please contact the school by telephone: 01582 572880 or by email: schooloffice@woodlands.luton.sch.uk

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 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) 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:

- 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.

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 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/department-for-education/about/personal-information-charter>

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