



Leamington Federation

Lighthorne Heath Primary School

Privacy Notice for Staff - How we use your information

Who are we?

Lighthorne Heath Primary School, part of the Leamington Federation, is the data controller for the personal information described in this notice. This means that the school decides why and how this information is used. The school is registered with the Information Commissioner's Office (ICO), registration number Z737279X.

You can contact the school at: Lighthorne Heath Primary School, Stratford Road, Lighthorne Heath, Leamington Spa, Warwickshire, CV33 9TW; email admin2064@welearn365.com.

Our Data Protection Officer

Our Data Protection Officer (DPO) is the School Data Protection Officer Service, Warwickshire Legal Services. You can contact the DPO at schooldpo@warwickshire.gov.uk, telephone 01926 412859, or by post at Warwickshire Legal Services, Warwickshire County Council, Shire Hall, Market Square, Warwick, CV34 4RL. Please state that your enquiry relates to Lighthorne Heath Primary School.

About this privacy notice

This notice explains how we collect, use, store and share personal information about employees, workers and other members of staff. It is provided in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025. We also follow current Department for Education (DfE) data protection guidance for schools and relevant ICO guidance.

We review privacy information at least annually and whenever there is a significant change to the way personal information is used. Where a new use would not reasonably be expected, we will update this notice and bring the change to the attention of affected individuals before the new processing begins.

What personal information do we collect?

- identity and contact details, date of birth, national insurance number, employee or teacher number and emergency contacts;
- bank, payroll, tax, pension and salary information;
- employment contract, role, working pattern, start and leaving dates, qualifications and professional registrations;
- recruitment records, references and safer-recruitment checks, including DBS, barred-list, right-to-work, teacher prohibition and other checks where applicable;
- absence, leave, sickness and occupational-health information;
- performance management, appraisal, training, CPD, capability, grievance and disciplinary information;
- safeguarding information relating to professional conduct, including low-level concerns, allegations and associated records where applicable;
- health and safety records, accident reports, risk assessments and reasonable adjustments;
- equality monitoring information, including special category data where collected lawfully;
- photographs and contact details used for school communications where appropriate;
- IT, email, network, device and cyber-security logs generated through use of school systems; and
- other information necessary to manage the employment relationship or comply with legal and safeguarding duties.

Where does the information come from?

Information comes mainly from you, but may also come from previous employers and referees, Warwickshire County Council HR/payroll services, DBS, Teaching Regulation Agency, pension and tax authorities, occupational health providers, safeguarding agencies, professional bodies, school managers, the school's IT systems and other lawful sources relevant to your employment.

Why do we use staff information?

- recruit, appoint and manage staff and administer contracts, pay, pensions and benefits;
- manage attendance, leave, health, wellbeing, reasonable adjustments and health and safety;
- support professional development, appraisal, performance management and workforce planning;
- meet safeguarding, safer-recruitment and professional-regulation responsibilities;
- complete statutory workforce returns and meet obligations to DfE, the local authority, HMRC and other public bodies;
- manage grievances, disciplinary matters, complaints and legal claims;
- protect school information, networks, devices and systems and investigate security or acceptable-use concerns; and
- operate the school safely, efficiently and lawfully.

Our lawful bases for using personal information

We only use personal information where data protection law allows us to do so. Depending on the purpose, our lawful bases under Article 6 UK GDPR may include:

- Article 6(1)(b) - performance of the employment contract and steps connected with that contract;
- Article 6(1)(c) - compliance with legal obligations, including employment, tax, pensions, equality, health and safety, safeguarding and statutory reporting;
- Article 6(1)(e) - performance of public tasks connected with operating a maintained school and providing education;
- Article 6(1)(d) - protection of vital interests in emergencies; and
- Article 6(1)(a) - consent for limited optional uses where consent is appropriate and can be freely withdrawn.

Where we use special category data, such as health, ethnicity, religious belief, trade union membership or information about a person's sex life or sexual orientation, we also identify a condition under Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018. These commonly include employment and social protection obligations, substantial public interest, health or social care, vital interests, legal claims, or explicit consent where consent is genuinely appropriate.

Criminal offence and safeguarding-vetting information is handled only where authorised by law, including Article 10 UK GDPR and the Data Protection Act 2018, and is subject to additional safeguards and restricted access.

Who may we share staff information with?

- Warwickshire County Council HR, payroll, legal, pension, health and safety or other relevant services;
- Department for Education, including through the School Workforce Census;
- HM Revenue & Customs, pension providers and other statutory bodies;
- DBS, Teaching Regulation Agency, professional regulators and safeguarding agencies where relevant;
- occupational health, employee assistance, medical or wellbeing providers where commissioned and necessary;
- our legal advisers, insurers, auditors and professional advisers;
- law enforcement, courts, HSE or other regulators where disclosure is required or lawful; and
- IT, payroll, HR and other contracted service providers acting as processors on our instructions.

Monitoring of school systems

School email, networks, devices and systems are provided for professional purposes and may be logged, filtered or monitored for cyber security, safeguarding, system administration, legal compliance and investigation of suspected misuse. Monitoring will be proportionate, access will be restricted and information will only be used for legitimate purposes described in school policies and this notice.

How we keep information secure

We use appropriate technical and organisational measures to protect personal information against accidental or unlawful loss, alteration, disclosure or access. Access is limited to people who need the information for their role. Our service providers must process information only on our instructions, keep it secure and meet data protection requirements.

How long we keep information

Staff records are kept for the periods set out in the school's retention schedule. Core personnel and employment records are normally retained for the duration of employment and for an appropriate period afterwards, commonly up to 6 years, while some records must be kept for longer because of safeguarding, pension, payroll, health and safety, legal or regulatory requirements. We retain only what is necessary for each purpose.

Records are securely deleted, destroyed or anonymised when they are no longer required. Our retention arrangements are reviewed regularly and are informed by the school's retention schedule, DfE guidance and the Information and Records Management Society (IRMS) Schools Toolkit where applicable.

International transfers

Some suppliers may store or access information outside the UK. Where this happens, we ensure that a lawful transfer mechanism and appropriate safeguards are in place, for example UK adequacy regulations or approved contractual safeguards, and we assess the protection available for the information concerned.

Automated decision-making and artificial intelligence

We do not currently use solely automated decision-making that produces legal or similarly significant effects on individuals. If this changes, or if we introduce an AI-enabled system that uses personal information in a way that could materially affect individuals, we will assess the data protection risks, update our privacy information where necessary and provide meaningful information about the use of the system.

Your data protection rights

Depending on the circumstances and the lawful basis being used, you may have the right to:

- ask for access to your personal information and receive a copy of it;
- ask us to correct inaccurate or incomplete information;
- ask us to erase information in certain circumstances;
- ask us to restrict the use of information in certain circumstances;
- object to particular uses of personal information in certain circumstances;
- receive personal information in a portable format where the right to data portability applies;
- withdraw consent at any time where we rely on consent; withdrawal does not affect processing already carried out lawfully; and
- challenge a decision based solely on automated processing where the law gives that right.

These rights are not absolute and may be limited where another legal duty or exemption applies. We will explain this if it affects a request. Requests can be made to the school or the DPO. We normally respond to valid data protection rights requests within one month, subject to the rules in data protection law.

Concerns and complaints

If you have a concern about how we use personal information, please contact the school or our DPO first so that we can try to resolve it. You also have the right to complain to the Information Commissioner's Office (ICO). Current contact details and complaint routes are available at ico.org.uk.

Reviewed: September 2026

Next review: September 2027

Chair of Governors: Richard Butler