



## **Privacy Notice for Staff, Governors and Volunteers**

**This Policy has been approved and adopted by the  
Xavier Catholic Education Trust in May 2022**

**Committee Responsible: Risk & Audit Committee  
to be reviewed in January 2026**

## Privacy Notice for staff, Governors and volunteers

Under the General Data Protection Regulation (GDPR), introduced in May 2018, individuals have a right to be informed about how the Trust uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about you. We, the school, are the 'data controller' for the purposes of data protection law.

### The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details and contact preferences
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Documents to support an Enhanced Disclosure and Barring Service application, such as copies of Passports, Bank statements, Birth and Marriage Certificates
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence
- Photographs
- CCTV footage captured in school
- Data about your use of the school's information and communications system

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions

- Trade union membership
- Disability, health and access requirements

This list is not exhaustive. The full list of processors is held on the Trust Record of Processing Activity.

## Why we use this data

We use this data to:

- Enable staff to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body
- Maintain effective governance
- Meet statutory obligations for publishing and sharing governor details
- Ensure that appropriate access arrangements can be provided for volunteers

## Our lawful basis for using this data

The school processes workforce data under the following legal bases:

**Contract** - to meet the contractual obligations with its workforce during the recruitment process and following employment.

**Legal Obligation** – to record, process and share data regarding its workforce to comply with employment law. This includes the legal duty to process governance information in respect to Trustees.

**Public Interest** – where processing is required in the performance of a task in the public interest.

**Consent** – where another legal basis is not already present, consent will be requested before processing personal data. Consent may be withdrawn at any time.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

## Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

## How we store this data and how long it is held

Personal data is stored in line with the IRMS [Information and Records Management Society's toolkit for schools](#). This is normally seven years from the date of leaving employment with the school, but in some instances, this may be longer when a legal basis is present. A copy of the Toolkit is held on the Trust SharePoint site.

We maintain files to store personal information about all staff and volunteers. The information contained in this file is kept secure and is only used for purposes directly relevant to work with the school.

## Data sharing

Workforce data is shared with:

- The local Authority to support the management of workforce data across the County (section 5 of the Education - Supply of Information about the School Workforce - (England) Regulations 2007 and amendments)
- The Diocese
- The Department for Education (DfE) and regulatory bodies such as Ofsted
- Payroll and personnel service providers
- Training, catering, occupational health providers
- Professional bodies, trade unions and associations
- Police forces, courts, tribunals

We are required to share information about our workforce with the DfE under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments. This data sharing underpins workforce policy monitoring, evaluation and links to school funding/expenditure and the assessment of educational attainment.

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.

In addition, Governor / Trustee data is shared with:

- School auditors
- Companies House
- the Local Authority Governor's database
- the Department for Education (DfE) and regulatory bodies such as Ofsted
- Other Board members
- On our school website

## Transferring data internationally

Where we transfer personal data to a country or territory outside the UK or European Economic Area, we will do so in accordance with data protection law.

## Your rights

### a. How to access personal information we hold about you

You can find out if we hold any personal information about you, and how we use it, by making a 'Individual Rights Request' (also known as a Subject Access Request).

If we do hold information about you, we will be able to:

- Give you a description of the information
- Tell you why we are holding and using it, and how long we will keep it for
- Identify where we got it from, if not from you or your parents
- Identify who it may be shared with
- Give you a copy of the information, subject to any legal restrictions

### b. Your other rights over your data

The other rights allow individuals to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- have inaccurate personal data rectified
- to restrict or erase information that no longer has a legal basis to be held

In some circumstances, where a legal reason exists, the school may decline a request by an individual about their data. In this case an explanation will be provided as to why the school is unable to support the request.

### Data Protection Officer

The Trust has appointed an independent Data Protection Officer as its DPO.

The Data Protection Officer is Roger Simmons and may be contacted via email at [rsimmonsltd@gmail.com](mailto:rsimmonsltd@gmail.com) and via telephone on 07704 838512.

However, please contact the Trust in the first instance if you have a query regarding this Privacy Notice or how your information is used.

Trust contact email: [info@xaviercet.org.uk](mailto:info@xaviercet.org.uk)

**Further information about the Principles of GDPR, the Rights of Individuals and the legal basis for processing data is available in the Trust's Data Protection and Information Security Policy.**

### **Complaints**

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we've done something wrong.

If you wish to make a complaint then please consult the complaints policy which can be found on the Trust's website [Complaints policy](#).

You can also complain to the Information Commissioner's Office in one of the following ways:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF