



Privacy Notice for Staff

Responsible Committee	CLPT Finance and Operations Committee
Date Approved by Committee	9th December 2025
Implementation Date	9th December 2025
Next Review Date	Autumn Term 2026
Policy Owner	Laura Austen

This document has been created to support the mission, values and beliefs of the Creative Learning Partnership Trust:

Our mission.

Creating
transformational
educative opportunities;
promoting **social justice**;
unlocking individual
freedom



Our values.

Integrity

Courage to do the right thing, taking time to care.

Speaking and acting truthfully, fairly and upholding universal, moral principles.



Collaboration.

Working together, enabling each other.

Working with others to achieve strategic direction and to develop mutual trust and respect.



Dedication.

Committed to supporting and improving.

Showing commitment to and responsibility for strategies and goals.



Kindness.

Thinking of others and acting with compassion.

Demonstrating intentional actions to show care, respect and empathy to others.



Innovation.

Using expertise and research to transform.

Taking a proactive approach to problem solving, showing creativity, forward thinking and adaptability.



Understanding.

Openness, listening and valuing one another.

Actively listening to others to gauge the perspectives and needs of others within relevant context.



C

CREATIVE.

Creativity is at the heart of how we achieve exceptional educational outcomes. It drives innovation and empowers us to transform new and original ideas into reality, enriching the learning experience for every child.

L

LEARNING.

Learning is at the core of all we do. We are relentless in our commitment to ensuring that every child within our care achieves outcomes that truly reflect their potential and aspirations.

P

PARTNERSHIP.

Collaboration and **partnership** are key to continuous improvement. By working together, we create an inclusive, supportive, and responsive **organisation** that listens and learns from all voices.

T

TRUST.

Trust is the foundation of our culture. It permeates every aspect of our schools and **organisation**, creating confidence, integrity, and building strong relationships across our entire community.

This privacy notice applies to all school staff within The Creative Learning Partnership Trust:

- **Greenhall School**
- **Hempstalls Primary School**
- **James Bateman Middle School**
- **Langdale Primary School**
- **Manor Hill First School**
- **Parkside Primary School**
- **Thursfield Primary School**
- **Green Lea First School**
- **Beaconfields Primary School**
- **Doxey Academy**
- **Burleyfields Primary School**

Under data protection law, 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' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at within our Trust.

We, The Creative Learning Partnership Trust, c/o Beaconfields Primary School, Ramson Avenue, Stafford, Staffs, ST16 1ZY, are the 'data controller' for the purposes of data protection law. Our data protection lead is the Trust's Chief Operating Officer.

The personal data we hold

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

- Contact details

- Date of birth, marital status and gender
- Next of kin and emergency contact numbers / email address
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including DBS check, copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- 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 / maternity data
- Copy of driving license and vehicle details including insurance certificate
- Photographs
- CCTV footage
- Data about your use of the Trust'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
- Health, including any medical conditions, medication taken and sickness records

Where We Obtain Your Personal Data

Most of the personal data we hold about you is provided directly by you during the recruitment process and throughout your employment. However, we may also obtain information from the following sources:

During Recruitment:

- **Previous employers:** References and employment verification
- **Disclosure and Barring Service (DBS):** Criminal records checks for safeguarding purposes
- **Teaching Regulation Agency (TRA):** Teacher prohibition checks and professional conduct information
- **Qualifications awarding bodies:** Verification of qualifications and professional memberships
- **UK Visas and Immigration:** Right to work verification

During Employment:

- **Occupational health providers:** Health assessments and fitness to work reports (with your consent)
- **Pension providers:** Information relating to your pension arrangements
- **HMRC:** Tax code information

- **Trade unions:** Membership information (with your consent)
- **Professional bodies:** Information about professional registration and conduct
- **Other schools within the Trust:** If you work across multiple Trust schools

In Specific Circumstances:

- **Local authority designated officer (LADO):** Information relating to safeguarding allegations
- **Police and legal authorities:** Information relating to criminal investigations or legal proceedings
- **Medical professionals:** Information provided with your consent for occupational health or reasonable adjustments purposes

Where we receive information about you from third parties, we will inform you as soon as practicable, unless we are legally prevented from doing so.

Why we use this data

The purpose of processing this data is to help us run the Trust, including to:

- Enable you 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

Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

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 Trust'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

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with the [Information and Records Management Society's toolkit for schools](#).

How Long We Keep Your Data

We will retain your personal data only for as long as necessary to fulfil the purposes for which it was collected and to comply with legal, accounting, or reporting requirements. Specific retention periods include:

Personnel and Employment Records:

- **Personnel files:** 6 years after employment ends
- **Timesheets and attendance records:** 6 years after the end of the financial year
- **Annual leave records:** 6 years after the end of the financial year

Payroll and Financial Records:

- **Payroll and pension records:** 6 years after the end of the tax year (HMRC requirement)
- **Bank account details:** Securely destroyed when no longer needed for payroll purposes
- **Expense claims:** 6 years after the end of the financial year

Recruitment Records:

- **Successful candidates:** Incorporated into personnel file and retained for 6 years after employment ends
- **Unsuccessful candidates:** 6 months after the recruitment process concludes
- **DBS certificates:** We do not retain copies of DBS certificates; we record the date, certificate number, and outcome only

Safeguarding and Child Protection:

- **Safeguarding records and allegations:** Retained in accordance with local safeguarding partnership guidance and statutory requirements. These records may be kept for longer periods where necessary
- **Records of allegations that are found to be malicious:** Removed from personnel files

Health and Safety:

- **Accident and incident reports:** 3 years from the date of the incident (or longer if the incident involves a child)
- **Occupational health records:** 6 years after employment ends (or 40 years for records relating to hazardous substances)

Performance and Conduct:

- **Performance management records:** 6 years after employment ends
- **Disciplinary and grievance records:** 6 years after employment ends
- **Training records:** 6 years after employment ends

Other Records:

- **Sickness and absence records:** 3 years after employment ends

- **Maternity records:** 3 years after the end of the tax year in which maternity leave ends
- **CCTV footage:** 30 days (unless required for an investigation or legal proceedings)
- **References provided to other employers:** 6 years from the date provided

For full details of our retention periods, please refer to our Records Retention Schedule, which is available on request from the Trust's Chief Operating Officer.

How We Keep Your Data Secure

We take the security of your personal data seriously and have implemented appropriate technical and organisational measures to protect it against unauthorised or unlawful processing, accidental loss, destruction, or damage.

Our security measures include:

- **Access controls:** Personal data is only accessible to staff members who need it to perform their duties. Access is controlled through secure login credentials and role-based permissions
- **Secure storage:** Paper records are stored in locked filing cabinets in secure areas. Electronic records are stored on password-protected systems with encryption
- **Data encryption:** Sensitive data is encrypted both in transit and at rest
- **Regular backups:** Electronic data is backed up regularly to prevent loss
- **Staff training:** All staff receive data protection training and are required to follow our data protection policies
- **Secure disposal:** When data is no longer needed, paper records are securely shredded and electronic data is permanently deleted
- **Third-party security:** We require all third-party service providers who process personal data on our behalf to implement appropriate security measures

If we discover a data breach that is likely to result in a risk to your rights and freedoms, we will notify you and the Information Commissioner's Office (ICO) within 72 hours of becoming aware of the breach.

CCTV and Monitoring

We may collect photographs and CCTV footage as part of our security and safeguarding measures.

Purpose of CCTV:

We use CCTV systems for the following purposes:

- To protect the security of our buildings and assets
- To safeguard staff, pupils, and visitors
- To assist in the prevention and detection of crime
- To support the management of the Trust

CCTV Coverage:

CCTV cameras are located at key areas across our Trust schools including main entrances, corridors, car parks, and external areas. Cameras are not installed in private areas such as toilets or changing rooms.

Retention and Access:

- CCTV footage is retained for 30 days, after which it is automatically overwritten unless required for an investigation or legal proceedings
- Access to CCTV footage is restricted to authorised personnel only
- You have the right to request access to CCTV footage that shows you (subject access request)

Cookies and Online Systems

When you access the Trust's online systems, information and communications platforms, or intranet, we may collect data about your usage through cookies and similar technologies.

What we collect:

- Login times and frequency of access

- Pages visited and features used
- Device information (e.g., IP address, browser type, operating system)

Why we collect this data:

- To ensure the security of our systems
- To monitor and improve system performance
- To provide technical support
- To comply with our network security policies

Your rights:

You can manage cookie preferences through your browser settings. However, disabling certain cookies may affect your ability to use some features of our online systems.

For more information, please contact the Trust's IT support team.

Automated Decision-Making and Profiling

The Trust does not use automated decision-making or profiling in relation to staff personal data. All decisions that affect your employment, including recruitment, performance management, and disciplinary matters, involve human intervention and oversight.

If this changes in the future, we will update this privacy notice and inform you of any automated processing that may affect you.

Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required or necessary (and it complies with data protection law) we may share personal information about you with:

- *Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns*
- *The Department for Education – school workforce census*
- *Your family or representatives – in the case of an emergency*
- *Educators and examining bodies*
- *Our regulator Ofsted*
- *Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll*
- *Financial organisations*
- *Central and local government – for statutory returns*
- *Our auditors – to meet the legal obligations of a multi academy trust*
- *Survey and research organisations*
- *Trade unions and associations*
- *Health authorities*
- *Security organisations*
- *Health and social welfare organisations*
- *Professional advisers and consultants*
- *Charities and voluntary organisations*
- *Police forces, courts, tribunals*

- *Professional bodies*
- *Employment and recruitment agencies*
- *Other schools within MAT – if working across schools*

Transferring data internationally

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

Your information rights You have the following rights in relation to your personal data:

The right of access

Individuals have a right to make a **‘subject access request’** to gain access to personal information that the Trust holds about them.

We have to provide a copy of your information to you free of charge, within 1 month. We can extend the deadline if your request is complex. We have to let you know if the deadline is to be extended within 1 month if this is the case.

Information is provided free of charge unless you request further copies of information we have already provided to you. However, we are permitted to charge a reasonable fee or refuse your request if it is manifestly unfounded or excessive. Any fee will be based on the administrative cost of providing the information to you.

The right of rectification

If you feel that any data that we hold about you is factually inaccurate, you have the right to ask us to correct or rectify it. In order for us to review your request you must provide evidence of the alleged inaccuracy.

The right of erasure

You have a right to ask us to erase information about you. This right will only apply where:

- The personal data is no longer necessary for the purpose which we originally collected it for
- We are relying on consent as the lawful basis for holding the data and you withdraw that consent
 - We are processing the data for direct marketing purposes and you object to that processing

Most of the processing carried out by the Trust is governed by legislation, which usually includes how long we have to keep your information for. The right of erasure won't apply where we have a lawful reason to process your data and it is kept in accordance with policies in our retention and disposal scheme.

The right to erasure also does not apply to information which is being processed in accordance with a ‘public task’. This means where we are carrying out a specific task in the public interest, which is laid down by law or exercising official authority. This includes, for example, information being processed for Educational, Health and Social Care purposes.

Your right of rectification and erasure extends to anyone we have disclosed your personal information to. We will take reasonable steps, where it is practicable for us to do so, to inform organisations with whom we have shared your information that you have made a request for erasure.

The right to restrict processing

You have the right to ask us to restrict processing of your personal data in the following circumstances:

If you contest the accuracy of your personal information and we need to verify its accuracy If we have unlawfully processed your information and you do not want us to erase the data If we no longer need your information but you need to keep it in order to establish, exercise or defend a legal claim You have objected to us processing your information and we are considering whether we have legitimate grounds to continue to process it

This right to restrict processing is closely linked but is distinctly different from the right to rectification and the right to object. As a matter of good practice we may automatically restrict processing of your personal information while we consider its accuracy or the legitimacy of processing it.

The right to data portability

You have a right to receive personal data that you have provided to us in order to transfer it onto another data controller. This right only applies where the processing is based on consent and is carried out by automated means. This is called a data portability request.

The right to object

You have the right to object to our processing your personal information where our lawful basis for processing is based on the performance of a 'public task' carried out in the public interest or exercise of official authority.

You have the right to withdraw your consent to our processing your personal information if our lawful basis for processing is 'consent'.

You also have the right to object to processing for the purpose of direct marketing. You can opt-out of receiving marketing communications from us at any time. You can do this by clicking on the 'unsubscribe' or 'opt-out' link in marketing emails we send to you. If you wish to opt-out of other forms of marketing such as postal or telephone marketing contact us using the addresses or telephone number below.

If we are processing your personal information for scientific or historical research, or statistical purposes your right to object is more limited.

The right of complaint or to raise a concern

You have the right to raise a concern or make a complaint about how we handle (process) your personal information or if you are not satisfied with how we have dealt with a request. **Complaints**

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact the Trust's Chief Operating Officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- 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

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, in the first instance, please contact the Trust's Chief Operating Officer.

Beaconfields Primary School, Ramson Avenue, Stafford, Staffs, ST16 1ZY. Telephone 01782 228912

Email: lausten@creativelrng.com

The Data Protection Officer acting for the Trust is:

Hedda Motherwell

Staffordshire County Council

Staffordshire Place 1

Stafford, Staffordshire

ST16 2DH

Telephone: 01785 278717

Email: dpo@staffordshire.gov.uk

This notice is based on the [Department for Education's model privacy notice](#) for the school workforce, amended to reflect the way we use data in this Trust.