



Under data protection law, individuals have a right to be informed about how the Trust/school 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 individuals we employ, or otherwise engage, to work at our schools and is applicable to all employees of the St Thomas Catholic Academies Trust (the 'Trust') and the schools included within the Trust.

The Trust (c/o St Martin de Porres Catholic Primary School, Pastures Way, Luton, LU4 0PF) is the data controller for the purpose of data protection law.

The Data Protection Officer ('DPO') can be contacted via [mgilmartin@stcat.co.uk](mailto:mgilmartin@stcat.co.uk); 01582 361601 (postal address: c/o St Martin De Porres Catholic Primary School, Pastures Way, Luton, LU4 0PF).

## What categories of information do you collect, process, hold and share?

We process data relating to those we employ, or otherwise engage, to work at our schools. 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
- 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
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information
- Records and outcomes of any disciplinary and/or grievance procedures
- Your image and/or voice
- Absence data
- Copy of driving licence and car registration number
- Photographs
- CCTV footage
- 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
- Health, including any medical conditions, and sickness records

## Why do we collect and use your information?

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

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Support effective performance management and continuing professional development
- 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
- Provide information via our website about the staff in our school and in policies linked to specific roles.
- Promote school activities via use of your details (including photos) in places such as the school newsletter, website, prospectus etc.

## The lawful basis on which we process this information

We only collect and use personal information about you when the law allows us to. We process this information under:

- Article 6(1)(b) GDPR as processing is necessary for a contract we have with you or because we have asked you to take specific steps before entering into a contract
- Article 6(1)(c) GDPR as processing is necessary for us to comply with the law
- Article 6(1)(e) GDPR as processing is necessary for us to perform a task in the public interest or for our official functions and this task or function is lawful.
- Article 9(2)(b) GDPR as processing is necessary for the purposes of carrying out our obligations in relation to employment law
- Article 9(2)(h) GDPR as processing is necessary, where applicable, for the purposes of preventative or occupational medicine to assess the working capacity of the employee or to obtain a medical diagnosis.

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)
- We have legitimate interests in processing the data

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.

## Data Protection Principles

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless;
  - (a) at least one of the conditions in Schedule 2 is met, and
  - (b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.

5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the UK unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

## Collecting this information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

## Storing this information

In accordance with the UK GDPR, the school does not store personal data indefinitely; data is only stored for as long as necessary to complete the task for which it was originally collected. This information may be stored in physical form or electronically both within the Trust and via cloud/online.

## Who we share this information with?

We routinely share this information with:

- the Local Authority
- The Department for Education (DfE)
- The school's Payroll & HR support provider (SchoolsHR Co-Operative, Medigold Health, Wellbeing Solutions Management and Dataplan)
- Pension Schemes for Teaching and Support Staff
- The Diocese, Board of Directors, Governors of the local governing body of the school you work within
- Other schools within the Trust
- The NHS, police, ambulance service and other statutory bodies
- The Teaching Regulatory Agency
- HMRC
- On occasions your personal data may be shared outside of the UK if, for example, the school are arranging a school trip

## 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)** - We share personal data with the Department for Education on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding / expenditure and the assessment educational attainment.

## Data collection requirements

The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005.

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>.

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 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's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>. To contact the department: <https://www.gov.uk/contact-dfe>

## Transferring data externally

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

## Use of Mailchimp (Email Communications Platform)

The Trust uses Mailchimp, a communication platform provided by The Rocket Science Group LLC (Intuit), to send newsletters, updates, surveys and other Trust-related communications to staff. Mailchimp acts as a data processor and only processes your data under our instructions.

Data shared with Mailchimp includes your name, work email address and engagement data (such as email opens and clicks). We do not upload any sensitive or special category data to Mailchimp.

Mailchimp processes data in the United States; these transfers are permitted under UK data protection law because Intuit participates in the Data Privacy Framework with the UK Extension. The Trust also uses the UK Addendum to the EU Standard Contractual Clauses as a supplementary safeguard where appropriate.

Mailchimp applies strong security protections including encryption, MFA, account isolation and regular penetration testing. The Trust applies additional controls such as restricted role-based access.

## 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 DPO.

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 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/>

## 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, in the first instance please contact the DPO. If you are unsatisfied with the response to your complaint, 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

## Further information

If you have any questions, concern or would like more information, please contact the DPO, [mgilmartin@stcat.co.uk](mailto:mgilmartin@stcat.co.uk); 01582 361601; c/o St Martin de Porres Catholic Primary School, Pastures Way, Luton, LU4 0PF.

**M Gilmartin, Data Protection Officer**

**February 2026**