



PRIVACY NOTICE

This Privacy Notice explains how we collect, use, store, and share information while ensuring transparency and security.

March 2025



office@feniscowles.blackburn.sch.uk

www.feniscowlesprimary.com



The categories of school workforce information that we collect, process, hold and share include:

- personal information (such as name, employee or teacher number, national insurance number)
- special categories of data including characteristics information such as gender, age, ethnic group
- contract information (such as start dates, hours worked, post, roles and salary information)
- work absence information (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught)
- medical information (such as occupational health reports and medical conditions)

Why we collect and use this information

- We use school workforce data to:
- enable the development of a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- enable individuals to be paid
- provide training and development for employees

Use of Artificial Intelligence (AI) in Data Processing

Why We Use AI in School Operations

Feniscowles Primary School may use Artificial Intelligence (AI) to assist with administrative and operational processes in ways that improve efficiency and support workforce management. AI may be applied in areas such as:

- Data Analysis and Reporting – Summarising workforce data to support staffing analysis, absence monitoring, training needs, and workforce planning.
- Administrative Efficiency – Assisting in document collation, timetable planning, policy summarisation, and drafting routine communications.
- Recruitment and HR Support – Supporting the organisation and review of recruitment documentation and workforce records.
- Professional Development Support – Helping identify relevant training opportunities and summarising professional guidance and development materials.
- Safeguarding and Compliance Monitoring – Assisting with identifying trends or patterns in workforce compliance records, training completion, or safeguarding requirements.

AI does not replace human decision-making. Any AI-generated summaries, reports, or insights are reviewed by appropriate school staff before decisions or actions are taken.

How AI Processes Workforce Data

- AI may process personal data already held by the school but will not collect new data beyond the school's existing records.
- AI does not make automated decisions about employees or workers.
- AI does not independently train itself using workforce personal data, ensuring all processing remains within school-controlled systems.
- Processed data is deleted immediately after the task is completed unless retention is required under the school's standard retention policies.

Security Measures for Protecting Workforce Data

Feniscowles Primary School follows strict security protocols to protect workforce data, including:

- Access Controls – Only authorised staff can access workforce data according to job role and responsibilities.
- Secure Storage –

- Paper records containing personal data are kept in locked cabinets.
- Digital records are stored on secure school systems and servers.
- Secure Data Transfer – Any sharing of personal data is conducted using secure email encryption, secure portals, or other approved secure systems.
- Data Breach Response – In the event of a breach, the school follows Information Commissioner’s Office (ICO) compliant procedures, including investigation and reporting where necessary.
- AI-Specific Security –
 - AI tools do not retain personal data beyond task execution.
 - All AI usage is monitored and approved by school leadership to ensure compliance with data protection requirements.

Staff receive regular data protection and cyber security training to maintain compliance and safeguard personal information.

The Lawful Basis on Which We Process This Information

We collect and use workforce data under the following conditions contained within Article 6(1) of the General Data Protection Regulations:

- (a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
- (c) Legal obligation: the processing is necessary for you to comply with the law
- (d) Vital interests: the processing is necessary to protect someone’s life.
- (e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- (f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual’s personal data which overrides those legitimate interests.

Where we process special category data we identify an additional processing condition within Article 9(2) of the GDPR:

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

We hold workforce data for a specified period which is detailed in the School’s Retention Schedule which is contained within the IRMS’s Information Management Toolkit for Schools. A copy of the retention schedule is available on request from the School’s Data Protection Officer.

Who we share this information with

We routinely share this information with:

- our local authority
- the Department for Education (DfE)

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 (DfE) 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 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.

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>

Requesting Access to Personal Data (Subject Access Requests - SARs)

Under UK GDPR, parents and pupils have the right to:

- Request access to their personal data
- Correct inaccurate data
- Request data erasure (where applicable)
- Object to data processing
- Restrict processing in certain circumstances

How to Make a Request

Requests should be made in writing to:

 **Email:** office@feniscowles.blackburn.sch.uk

 **Address:** Feniscowles Primary School, Blackburn, BB2 5EG

We will respond within one month of receiving a valid request. Proof of identity may be required.

If you have concerns about how we process your data, you can contact the Information Commissioner's Office (ICO):

 [ICO Website](#)

Contact for Data Protection Queries

 **Email:** Schools.IG@blackburn.gov.uk

 **Lee Gardiner, Schools Data Protection Officer**