



Privacy Notice for School Staff

This Privacy Notice explains how we collect, store, and use personal data about individuals employed by, or otherwise working at, our school. Under data protection law, individuals have a right to be informed about how the school uses their personal data.

Egerton Church of England Primary School is the "**data controller**" for the purposes of Data Protection law and is registered with the Information Commissioner's Office (ICO), reg no. Z7322463.

Our Data Protection Officer is Andy Crow, dpo@dpoforeducation.co.uk. The school's designated Data Champion is Mrs Sue Hubbard, who can be contacted in the first instance at sbm@egerton.kent.sch.uk or 01233 756274.

The Personal Data We Hold About Staff

Personal data that we may collect, use, store, and share) about staff includes, but is not restricted to:

- Contact details, emergency contact details, date of birth, and identification documents
- Financial and payroll details, bank account details, National Insurance number, and tax status information
- Recruitment information, including references, application forms, CVs, cover letters, and qualifications
- Right to work, citizenship, and immigration status information
- Enhanced Disclosure and Barring Service (DBS) records, prohibition check records, and safeguarding background checks
- Contract details, terms and conditions of employment, job titles, start/end dates, working hours, and salary history
- Performance details, teacher assessment records, appraisal targets, training logs, and professional development records
- Disciplinary, capability, and grievance records
- Workplace attendance, sickness records, annual leave records, and statutory leave details
- Health, occupational health assessments, medical conditions, body maps, and accident records
- Visitor logs, electronic door entry system logs, and staff ID tag usage
- Images, video recordings, and professional biographical details for staff directories or publicity
- Network monitoring logs, internet usage, and official school email audit trails

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

- Race, ethnicity, religious beliefs, sexual orientation, and political opinions
- Trade union membership
- Health data, including physical or mental health conditions, disability details, and sickness absence logs

Why We Use Staff Data

We use staff personal data to:

- Enable staff to be paid, administer pensions, and make statutory deductions (tax, NI)
- Facilitate safe recruitment, as part of our statutory safeguarding obligations towards pupils
- Support effective performance management, appraisal, and continuous professional development
- Inform workforce planning, cover arrangements, and school management strategies
- Assess the quality of our services and support teaching and learning evaluation
- Meet our statutory reporting requirements to the Department for Education (DfE) (e.g., School Workforce Census)
- Fulfill health and safety, duty of care, and occupational health obligations
- Protect school premises, IT systems, and assets from unauthorized access or security breaches
- Comply with legal obligations and facilitate internal or external audits

Our Legal Basis for Using This Data

We only collect and use personal data when the law allows us to. Most commonly, we process staff data where:

- We need to comply with a legal obligation (e.g. tax laws, statutory safeguarding duties, employment law)
- We need to perform a contract we have entered into with you (your contract of employment)
- We need to perform a task carried out in the public interest (delivering state education and running a school)

Less commonly, we may also process personal data in situations where:

- We have obtained your explicit consent to use it in a specific way (e.g. publication of photos on public media)
- We need to protect your vital interests or someone else's vital interests (e.g. medical emergencies)

Where we process special category data (e.g. health data or trade union membership), we rely on explicit statutory conditions under employment law or public interest grounds. Where we rely on consent, you may withdraw your consent at any time by contacting our Data Protection Officer.

Collecting Staff Information

While the majority of information we request from you is mandatory to fulfill your employment contract or statutory obligations, some information may be provided voluntarily. Whenever we seek to collect data, we will clarify whether providing it is mandatory or optional, and explain the potential consequences of not providing it.

How We Store Staff Data

- We retain staff personal data while you are employed at our school. We also retain your data after your employment ends where necessary to comply with legal obligations (e.g. tax audits, safeguarding record retention, employment references).
- Typically, staff personnel files are retained for the duration of employment plus 6 years following your leave date, with safeguarding/child protection records retained in line with statutory national guidance.
- All paper and electronic records are securely stored, encrypted where appropriate, and disposed of securely at the end of the retention period in accordance with our Retention Policy.

Data Sharing

We do not share information about staff with any third party without consent unless the law and our policies allow us to do so. Where legally required or necessary, we may share personal staff data with:

- The Department for Education (DfE) – to meet statutory obligations such as the annual School Workforce Census

- Her Majesty's Revenue and Customs (HMRC) – for payroll, tax, and National Insurance administration
- Payroll and Pension Providers – to administer your pay, pensions (TPS/LGPS), and statutory benefits
- Occupational Health and Medical Practitioners – to assess fitness for work and fulfill our duty of care
- Our Regulator, Ofsted – during statutory school inspections
- Local Authorities and Trust Networks – (e.g., Nottinghamshire, Leicestershire, Raleigh Education Trust) for safeguarding, workforce reporting, and governance support
- External HR, Legal, and Audit Advisors – to fulfill statutory governance and compliance duties
- Suppliers and Service Providers – to enable software and operational systems to function securely (e.g. CPOMS, Arbor, Insight)
- Police forces, courts, and tribunals – to comply with legal proceedings or investigations
- Future employers – to provide official employment references

Transferring Data Internationally

We may transfer staff data to cloud service providers operating outside the UK. If we do this, we ensure appropriate safeguards are in place (such as Standard Contractual Clauses / International Data Transfer Agreements or adequacy decisions) to guarantee your data receives the same level of protection as in the UK.

Data Security and Monitoring

Protecting staff data is a priority. We use technical and organizational measures including encryption, strict role-based access controls, regular cyber security audits, and firewall protections.

Please note that school IT networks, email accounts, and devices are monitored for safeguarding, network security, and compliance purposes in line with our Acceptable Use Policy.

Subject Access Requests & Your Rights

Under data protection law, staff members have the right to request access to personal data held about them (Subject Access Request).

Under the Data (Use and Access) Act 2025 (DUAA):

- Searches conducted for your data will be "reasonable and proportionate." The school is not required to carry out exhaustive or unlimited searches where effort would be disproportionate.
- If your request is broad, we may ask you to clarify the specific timeframes or scope.
- The 1-month statutory response window will pause on the day clarification is requested and restart once your response is received.

Staff also have the right to:

- Object to processing that causes damage or distress
- Request rectification of inaccurate data or erasure of data where legally permissible
- Restrict processing in certain contested circumstances

Complaints

If you have concerns about our handling of your personal data, please raise them with us in the first instance.

To make a complaint, contact our Data Protection Officer at dpo@dpoforeducation.co.uk or our school Data Champion at sbm@egerton.kent.sch.uk.

You also have the right to complain directly to the Information Commissioner's Office:

- **Online:** <https://ico.org.uk/concerns/>
- **Phone:** 0303 123 1113
- **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

Contact Us

For any queries regarding this notice, please contact our Data Champion:

- **Email:** XX@XX
- **Phone:** 01234 567890