



# Privacy Notice: School Workforce

Darell Primary and Nursery School

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## 1. Introduction

Under UK data protection law, individuals have a right to be informed about how the 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 notice explains how we collect, store, and use personal data about individuals we employ, or otherwise engage, to work at our school. **Darell Primary and Nursery School** is the 'Data Controller' for these purposes.

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## 2. The personal data we collect and hold

We collect, use, store, and share (when appropriate) information including:

- **Identity:** Name, DOB, NI number, marital status, and emergency contacts.
- **Financial:** Salary, pension, bank details, and payroll/tax records.
- **Recruitment:** CVs, references, right-to-work docs, and evidence of qualifications.
- **Screening:** DBS results and **online search results** (conducted as part of due diligence).
- **Performance:** Appraisals, ratings, disciplinary/grievance records, and training logs.
- **Attendance:** Sickness, family leave, and absence reasons.
- **IT Usage:** Data from your use of school systems, including **filtering and monitoring logs** (for safeguarding and security).
- **Special Categories:** Ethnicity, religion, sexual orientation, and relevant medical/disability data.

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## 3. Why we collect and use this data

The purposes of processing this data include:

- Running the school efficiently and facilitating safe recruitment.
  - Ensuring you are paid and provided with benefits.
  - Fulfilling safeguarding obligations toward pupils.
  - Managing performance, appraisals, and workforce planning.
  - Complying with statutory workforce census requirements.
  - Equalities monitoring and reporting.
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#### 4. The lawful basis for using this data

We process your personal data under the following **Article 6 (UK GDPR)** bases:

- **Contract:** Necessary for your employment contract.
- **Legal Obligation:** Necessary to comply with the law (e.g., Education Acts).
- **Public Task:** Necessary for the provision of education and school management.
- **Vital Interests:** To protect your life in an emergency.

For **Special Category Data** (Article 9), we rely on:

- **Employment and Social Protection:** To fulfill our obligations as an employer.
  - **Substantial Public Interest:** For safeguarding and equality of opportunity.
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#### 5. Collecting this data

While the majority of information is mandatory, some is provided voluntarily. We will always inform you at the point of collection whether providing data is a requirement or a choice.

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#### 6. How we store this data

We maintain secure physical and digital personnel files. Information is only used for purposes directly relevant to your employment. Once your employment ends, records are retained in accordance with our **Data Retention Policy** (typically 6 years post-employment, unless specified otherwise for safeguarding).

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#### 7. Who we share data with

Where necessary and legal, we share data with:

- **London Borough of Richmond (LA):** For safeguarding and Headteacher performance.
- **Department for Education (DfE):** For statutory census returns.
- **Financial Providers:** HMRC, pension schemes (e.g., Teachers' Pensions), and payroll.
- **Ofsted:** During school inspections.
- **Professional Bodies:** Trade Unions and awarding bodies.

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## 8. Transferring data internationally

If we transfer data outside the UK (e.g., cloud storage), we ensure the country has an **Adequacy Decision** from the UK government or that appropriate safeguards (like Standard Contractual Clauses) are in place to ensure your data is protected.

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## 9. Data Protection Rights

You have the right to:

- **Access:** Request a copy of the data we hold (Subject Access Request).
- **Rectify:** Ask us to correct inaccurate data.
- **Object:** Challenge processing based on public interest or legitimate interests.
- **Restrict/Erase:** Request we stop using or delete your data (where legal obligations allow).

To exercise these rights, please contact our Data Protection Lead.

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## 10. Complaints and Contact

If you have a concern, please contact our internal lead first. If you remain unsatisfied, you may contact our external DPO or the ICO.

**School Data Protection Lead:** Emma Claridge

**Email:** info@darell.richmond.sch.uk

**Phone:** 0208 876 6721

**Independent Data Protection Officer (DPO):** Satswana

**Email:** info@satswana.com

**Address:** Suite G12 Ferneberga House, Alexandra Road, Farnborough, GU14 6DQ

**Information Commissioner's Office (ICO): Web:** <https://ico.org.uk/make-a-complaint/>

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## Staff Privacy Induction Checklist

*This can be used during new starter inductions to ensure transparency.*

- **Mandatory Data:** Understood that Name, Address, NI Number, and DBS data are required for the employment contract and legal safeguarding.
- **Special Category Data:** Aware that Ethnicity and Religion data is used for anonymous equality reporting and can be withheld.

- **Filtering & Monitoring:** Aware that school-provided IT equipment and Wi-Fi are monitored for safeguarding purposes (KCSIE 2026).
- **Emergency Contacts:** Provided at least two emergency contacts and confirmed they are happy for the school to hold their details.
- **Subject Access Rights:** Knows how to request a copy of their personnel file via the Data Protection Lead.

| Update Area     | Change Detail                                                                                                                         |
|-----------------|---------------------------------------------------------------------------------------------------------------------------------------|
| Online Searches | We now conduct social media and public domain searches on all shortlisted candidates to comply with the latest safeguarding guidance. |
| IT Monitoring   | Active monitoring of school devices is now a mandatory safeguarding requirement to prevent "harmful online content" exposure.         |
| DBS Portability | We have updated our language regarding the use of the DBS Update Service for ongoing suitability checks.                              |

**Status:** Updated January 2026

**Next Review:** January 2027