Privacy Notice
(Workforce-Staff)
Dormers Wells Primary School

Believe Aspire Flourish

Diversity, Opportunity, Resilience, Moral values, Excellence, Respect, Self-Belief

Last reviewed, ratified and adopted by the Full Governing Body	October 2025
Next review due by	October 2026

This policy was based on model 'The Key' policy.

This policy will be reviewed every year (GB determined).

NEW

We've updated this model privacy notices with the following changes:

- **Section 3:** added an optional section to reflect school's/trust's approach to artificial intelligence (AI)
- **Section 7.1:** Revised the final 2 paragraphs of this section to provide more clarity on protecting data sent abroad
- **Section 9:** we've revised this section to reflect new requirements under the Data (Use and Access) Act 2025 to let people know they can complain directly to you about how you've used their data

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1. Introduction

Under UK data protection law, individuals have a right to be informed about how our school 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 who otherwise engage to work at our school**. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time but if we do so, we will provide you with an updated copy as soon as reasonably practical.

Our trust, Dormers Wells Learning Trust, **C/O Dormers Wells High School, Dormers Wells Lane, Southall, UB1 3HZ**, is the 'data controller' for the purposes of UK data protection law.

We will comply with the data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept securely

2. The personal data we hold

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

- Your name
- 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
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence
- Information about your use of our information and communications systems, equipment and facilities (e.g. school computers)

We may also collect, use, store and share (when appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Information about any health conditions you have that we need to be aware of
- Sickness records
- Photographs and CCTV images captured in school
- Information about trade union membership

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and local authorities, and the Disclosure and Barring Service in respect of criminal offence data.

3. Why we use this data

We collect and use the data listed above to:

a) Enable you to be paid

b) Check your entitlement to work in the UK

c) Determine the terms on which you work for us

d) Facilitate safe recruitment, as part of our safeguarding obligations towards pupils

e) Support effective performance management

f) Inform our recruitment and retention policies

g) Allow better financial modelling and planning

h) Enable equalities monitoring

i) Improve the management of workforce data across the sector

j) Support the work of the School Teachers' Review Body

k) Make sure our information and communications systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely

l) Ascertain your fitness to work

m) Manage sickness absence

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by selecting the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

3.2 Use of your personal data in automated decision-making and profiling

We do not currently process any staff members' personal data through automated decision-making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

3.3 Use of your personal data for filtering and monitoring purposes

While you're in our school, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. Safeguarding and child protection policy, IT acceptable use policy) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)
- Protect your welfare

3.4 Use of your personal data in artificial intelligence (AI) systems

We use a range of digital systems and services to support teaching, learning, safeguarding, administration and the day-to-day operation of the school. Some of these systems include artificial intelligence (AI) or machine-learning features.

These technologies help staff carry out certain tasks more efficiently, such as drafting documents, summarising information, analysing data, identifying trends, supporting educational activities and improving school services.

Where AI technologies process personal data, we will ensure this is done in accordance with UK data protection law and our artificial intelligence (AI) policy, together with our wider information governance policies and procedures. We will only use systems that have been appropriately assessed and approved by the school.

AI technologies are used to support staff and are not relied upon as the sole basis for any decision-making including that which may have a legal or similarly significant effects on individuals. Important decisions such as decisions relating to pupils' education, wellbeing, safeguarding, attendance, behaviour or support, also decisions around recruitment, will continue to involve appropriate human review, oversight and professional judgement.

We take steps to ensure that all suppliers providing AI-enabled services have appropriate privacy, security and data protection safeguards in place to protect personal information. Where such services are provided by suppliers, those suppliers are required to process your personal information only in accordance with our instructions and are not permitted to use it for their own purposes, including to train AI models, except where expressly authorised by the school.

4.1 Our lawful basis for using this data

Our lawful bases for processing your personal data for the purposes listed in section 3 above are as follows:

- For the purposes of a-m from section 3 above, in accordance with the 'public task' basis – we need to process data to fulfil our statutory function as a school as set out here:

    - List any relevant legislation or guidance that applies
- For the purposes of a-m from section 3 above, in accordance with the 'legal obligation' basis – we need to process data to meet our responsibilities under law as set out here:
    - Relevant legislation or guidance that applies;
- For the purposes of a-m from section 3 above], in accordance with the 'consent' basis – we will obtain consent from you to use your personal data
- For the purposes of a-m from section 3 above, in accordance with the 'vital interests' basis – we will use this personal data in a life-or-death situation
- For the purposes of a-m from section 3 above], in accordance with the 'contract' basis – we need to process personal data to fulfil a contract with you or to help you enter into a contract with us
- For the purposes of a-m from section 3 above], in accordance with the 'legitimate interests' basis – where there's a minimal privacy impact and we have a compelling reason, including:
    - 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 would go about withdrawing consent if you wish to do so.

4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

5. Collecting this data

We will only collect and use your data when the law allows us to (as detailed above in section 4 of this notice). While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

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.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts or tribunals

6. How we store this data

We keep personal information about you while you work at our school. We may also keep it beyond your employment at our school if this is necessary to comply with our legal requirements or to meet our regulatory requirements. Our records retention/ management policy sets out how long we keep information about staff.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer have a legal requirement to retain it.

7. Who we share data with

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

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

- Our local authority, Ealing, to meet our legal obligations to share certain information with it, such as safeguarding concerns

- Government departments or agencies
- Department for Education
- Our regulator, e.g. Ofsted
- Suppliers and service providers:

  -e.g. catering, filtering and monitoring
- Financial organisations
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts or tribunals

7.1. Transferring data internationally

We may share personal information about you with the following international third parties, where different data protection legislation applies:

For example:

- Other schools or educational establishments
- Government departments or agencies
- Security organisations
- App or cloud server providers
- Filtering and monitoring providers

On the basis of an adequacy regulation (previously named 'adequacy decision') by the UK government.

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law. This means that your personal information will be subject to one or more of the appropriate safeguards set out in data protection law to ensure your personal information is adequately protected.

Further details on the safeguards in place to protect your personal information when transferred outside of the UK are available upon request, by contacting School data protection lead, DHT Ellie Mosley.

8. Your Rights

8.1. How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- Give you a description of it
- Tell you why we are holding it, how we are processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

8.2. Your other rights regarding your data

Under UK data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data where it is likely to cause, or is causing damage or distress
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office if you feel we have not used your information in the right way
- Claim compensation for damages caused by a breach of the data protection regulations

We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

- Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task
- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests
- Right to object to use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent

See information on types of lawful basis in section 4 of this privacy notice.

To exercise any of these rights, please contact us (see 'Contact us' below).

9. 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 concerns about our data processing, please raise this with us in the first instance.

You can make a complaint to us at any time by contacting the School data protection lead, DHT Ellie Mosley.
When we receive a data protection complaint, we will:

- Acknowledge receipt of the complaint within 30 days of receiving it
- Without undue delay, take appropriate steps to respond to the complaint which may include:
  - Making enquiries based on the circumstances of the complaint; and
  - Keeping the complainant informed on the progress of the investigation
- Without undue delay, inform the complainant of the outcome of the investigation

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

- Report a concern online at https://ico.org.uk/make-a-complaint/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

10. Contact Us

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**.

Our data protection officer is:

Judicium Consulting Limited
Address: 72 Cannon Street, London, EC4N 6AE

Email: dataservices@judicium.com
Web: www.judiciumeducation.co.uk
Lead Contact: Craig Stilwell
(whoever is most appropriate].

However, our **data protection lead** has day-to-day responsibility for data protection issues in our school.

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact them:

- DHT, Ellie Mosley, admin@dwps.co.uk

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

11. Links with other policies

This Privacy notice for workforce-staff policy links to the following policies:

- Data Retention/Record Management Policy
- Data Protection Policy
- Privacy notices (parents-pupils, governors)