# Privacy Notice for Staff

## Kenilworth Primary School

**Our Vision**

*'High Aspirations Today, Inspiring the Leaders of Tomorrow.'*

# PRIVACY NOTICE FOR STAFF

**Last updated: November 2026**

## What is the purpose of this document?

Kenilworth Primary School is committed to protecting the privacy and security of your personal information.

This privacy notice explains how we collect and use personal information about you before, during and after your working relationship with us, in accordance with UK data protection law (the UK General Data Protection Regulation, the Data Protection Act 2018, and the Data (Use and Access) Act 2025).

**Who does this apply to?**

This notice applies to all employees, workers and contractors - both current and former staff members.

**Please note:** 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.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you.

## About Kenilworth Primary School

Kenilworth Primary School is a Hertfordshire LA maintained school. We are a "data controller", which means we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

**Our Data Protection Officer is Mr Anil Mepani.**

If you have any questions about this privacy notice, please contact:

- **Email:** dpo@kenilworth.herts.sch.uk
- **Phone:** 0208 953 3459

## Data protection principles

We will comply with data protection law, which says that the personal information we hold about you must be:

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

## What information do we hold about you?

**Personal data** means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

**Special categories** of personal data are more sensitive and require higher levels of protection.

### Standard personal information we collect:

- **Personal contact details (name, title, addresses, telephone numbers, personal email addresses)**
- **Date of birth**
- **Gender**
- **Marital status and dependants**
- **Next of kin and emergency contact information**
- **National Insurance number**
- **Bank account details, payroll records and tax status information**
- **Salary, annual leave, pension and benefits information**
- **Teacher Reference Number (where applicable)**
- **Start date and location of employment**
- **Recruitment information, including:**
    - **Copies of pre-vetting recruitment and identity checks**
    - **Employment history**
    - **Standard or Enhanced Disclosure and Barring Service (DBS) checks**
    - **Barred Lists checks**
    - **Prohibition checks**
    - **Disqualification checks (e.g., under the Childcare (Disqualification) Regulations 2009)**
    - **Further checks if you have lived or worked outside the UK**
    - **Nationality and right to work documentation**
    - **References**
    - **Information from your CV, application form or cover letter**
- **Employment records (job titles, work history, working hours, training records, professional memberships)**
- **Compensation history**
- **Performance information**
- **Disciplinary and grievance information, including warnings issued**
- **Information about your use of our information and communications systems**
- **Photographs**

### Special categories of sensitive information we may collect:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions
- Information about your health, including any medical condition, health and sickness records
- Information about criminal convictions (where relevant)

## How is your personal information collected?

We collect personal information about you:

### During recruitment:

- Directly from you through the application process
- Sometimes from employment agencies or background check providers

- From third parties including former employers, references, the Local Authority, or other background check agencies

**During your employment:**

- Through job-related activities throughout your time working for us
- From systems you use (e.g., IT systems, timesheets, performance reviews)
- From third parties (e.g., occupational health, pension providers)

# How we use your information

## Our legal basis

We will only use your personal information when the law allows us to. Most commonly, we use your information:

1. **Where we need to perform the contract** we have entered into with you
2. **Where we need to comply with a legal obligation**
3. **Where we need to protect your interests** (or someone else's interests)
4. **Where it is needed in the public interest or for official purposes**

## Specific situations where we process your information

We need the information listed above primarily to allow us to perform our contract with you, to comply with legal obligations, and/or where it is needed in the public interest or for official purposes.

**We use your personal information for:**

**Recruitment and employment:**

- Making decisions about your recruitment or appointment
- Determining the terms on which you work for us
- Checking you are legally entitled to work in the UK
- Checking Qualified Teacher Status, teacher induction completion, and any prohibitions or sanctions (via Teacher Services)
- Maintaining our single central record and complying with safeguarding obligations
- Paying you and deducting tax and National Insurance contributions
- Providing employment benefits
- Liaising with your pension provider

**Day-to-day operations:**

- Administering your employment contract
- Business management and planning, including accounting and auditing
- Conducting performance reviews and managing performance
- Making decisions about salary reviews and compensation
- Assessing qualifications for particular jobs or tasks, including promotion decisions
- Education, training and development requirements

**HR and wellbeing:**

- Ascertaining your fitness to work
- Managing sickness absence
- Ensuring your health and safety
- Providing appropriate workplace adjustments
- Maintaining and promoting equality in the workplace

**Compliance and legal:**

- Gathering evidence for possible grievance or disciplinary hearings
- Responding to complaints or investigations from stakeholders or regulators
- Making decisions about your continued employment
- Making arrangements for the termination of our working relationship
- Providing references to prospective employers
- Dealing with legal disputes involving you or other staff members, including accidents at work
- Complying with health and safety obligations
- Preventing fraud
- Monitoring your use of our IT and communication systems to ensure compliance with our policies
- Ensuring network and information security
- Liaising with regulatory bodies (Teaching Regulation Agency, DfE, DBS, Local Authority) about your suitability to work in a school
- Receiving advice from external advisors and consultants
- Conducting data analytics to review and understand staff retention and attrition rates

Some of these grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

### If you fail to provide personal information

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 benefits)
- Comply with our legal obligations (such as ensuring health and safety)
- Discharge our obligations which may be in the public interest or for official purposes

### Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider we need to use it for another compatible reason. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis.

We may process your personal information without your knowledge or consent where this is required or permitted by law.

## How we use sensitive personal information

Special categories of sensitive personal information require higher levels of protection. We may process this information:

1. **With your explicit written consent** (in limited circumstances)
2. **Where we need to carry out our legal obligations** (in line with our Data Protection Policy)
3. **Where it is needed in the public interest** (such as for equal opportunities monitoring, in line with our Data Protection Policy)
4. **Where it is needed to assess your working capacity on health grounds** (subject to appropriate confidentiality safeguards)
5. **Where it is needed for legal claims** or to protect your interests (or someone else's) when you cannot give consent
6. **Where you have already made the information public**

### Our obligations as an employer

We use your sensitive personal information in the following ways:

**Health and disability information:**

- To ensure your health and safety in the workplace
- To assess your fitness to work
- To provide appropriate workplace adjustments
- To comply with the Equality Act 2010
- To monitor and manage sickness absence
- To administer benefits

**Equality monitoring:**

- Information about your race, ethnicity, religious beliefs, or sexual orientation is used to ensure meaningful equal opportunity monitoring and reporting

**Leave information:**

- Information about leaves of absence (including reasons such as sickness, family-related leave, or sabbaticals) to comply with employment and other laws

### Do we need your consent?

We do not need your consent if we use sensitive information in accordance with our written policy where processing is necessary:

- To carry out our legal obligations or exercise specific rights in employment law
- For the establishment, exercise or defence of legal claims
- For reasons of substantial public interest (as authorised by the Data Protection Act 2018)

In other circumstances, we may ask for your written consent. If we do, we will provide full details of the information we need and why, so you can carefully consider whether to consent.

**Important:** It is not a condition of your employment that you agree to any request for consent.

## Information about criminal convictions

We may only use information about criminal convictions where the law allows us to. This will usually be where it is necessary to carry out our obligations and provided we do so in line with our Data Protection Policy.

We may hold information about criminal convictions if it comes to light:

- During recruitment through DBS checks
- During your employment with us

Less commonly, we may use this information where it is necessary for legal claims, to protect your interests (or someone else's) when you cannot give consent, or where you have already made the information public.

## Who we share your information with

We may share your data with third parties where required by law, where it is necessary to administer your employment, where it is needed in the public interest or for official purposes, or where we have your consent.

### Organisations we routinely share data with:

- **Hertfordshire County Council** (our Local Authority)
- **The Department for Education (DfE)**
- **The Disclosure and Barring Service (DBS)**
- **The Teaching Regulation Agency**

- **Teachers' Pension Service** (for teachers)
- **Local Government Pension Scheme** (for support staff)
- **HfL/HCC HR Advisory Team**
- **HMRC**
- **Our legal advisors (HCC)**
- **The police or other law enforcement agencies** (when necessary)

We require all third parties to respect the security of your data and treat it in accordance with the law. Some organisations are joint data controllers, meaning we are all responsible to you for how we process your data.

We may transfer your personal information outside the UK. If we do, you can expect a similar degree of protection for your personal information.

## Department for Education (DfE) data sharing

We share personal data with the DfE on a statutory basis under the Education (Supply of Information about the School Workforce) (England) Regulations 2007 (as amended).

This data sharing underpins workforce policy monitoring, evaluation, and links to school funding/expenditure and educational attainment assessment.

### What the DfE does with your data:

The DfE collects and processes personal data about those employed by schools (including maintained schools, academies, free schools and special schools). All state-funded schools must make census submissions - this is a statutory requirement under sections 113 and 114 of the Education Act 2005.

The DfE may share information about school employees with third parties who promote the education or wellbeing of children, or the effective deployment of school staff, by:

- Conducting research or analysis
- Producing statistics
- Providing information, advice or guidance

### DfE's safeguards:

The DfE has robust processes to ensure confidentiality is maintained and there are stringent controls regarding access and use. Decisions on releasing personal data are subject to strict approval based on:

- Who is requesting the data
- The purpose for which it is required
- The level and sensitivity of data requested
- Arrangements to securely store and handle the data

Organisations must comply with strict terms and conditions covering confidentiality, security, retention and use of data.

### For more information:

- DfE data collection: https://www.gov.uk/education/data-collection-and-censuses-for-schools
- DfE data sharing process: https://www.gov.uk/data-protection-how-we-collect-and-share-research-data
- Contact DfE: https://www.gov.uk/contact-dfe

### Freedom of information requests

We may disclose your personal data in response to a Freedom of Information Act 2000 request or a Subject Access Request. We may approach you for consent, but we will only disclose your data if we are satisfied it is reasonable to do so in all circumstances. We may refuse to disclose some or all of your personal data.

### How secure is your information with third parties?

All third-party service providers must take appropriate security measures to protect your personal information in line with our policies. We do not allow them to use your data for their own purposes - only for specified purposes and in accordance with our instructions.

## Data security

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.

### Our security measures include:

- Paper-based records and portable electronic devices kept under lock and key when not in use
- Complex passwords to access school systems
- Encryption software to protect portable devices and removable media
- Limited access to your information - only those with a business need to know
- Duty of confidentiality for all who process your information
- Procedures to deal with suspected data security breaches

We will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Details of our full security measures are available in our Data Protection Policy.

## How long we keep your information

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including satisfying any legal, accounting, insurance or reporting requirements.

We follow retention periods set out in the Information Records Management Society (IRMS) guidance for schools. Details are in our Data Protection Policy (Appendix 2: Data retention schedule).

### Key retention periods for staff information:

- **Personnel records:** During employment + 6 years
- **Payroll records:** Last day of employment + 85 years (for pension purposes)
- **Sickness records:** Current academic year + 6 years
- **Safeguarding allegations:** Until normal retirement age or 10 years from the allegation (whichever is longer), then review

In some circumstances we may anonymise your personal information so it can no longer be associated with you. Once you are no longer employed by us, we will retain and securely destroy your personal information in accordance with our Data Retention Policy.

## Your rights

### Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. **Please keep us informed if your personal information changes during your employment.**

## Your rights under data protection law

You have the right to:

- **Request access** to your personal information (Subject Access Request) - to receive a copy of the information we hold and check we are lawfully processing it
- **Request correction** of inaccurate or incomplete information we hold about you
- **Request erasure** of your personal information where there is no good reason for us continuing to process it, or where you have exercised your right to object
- **Object to processing** where we are relying on legitimate interests and there is something about your particular situation that makes you want to object, or where we are processing for direct marketing
- **Request restriction of processing** - to ask us to suspend processing, for example if you want us to establish accuracy or the reason for processing
- **Request transfer** of your personal information to another party (in certain circumstances)
- **Withdraw consent** where we are relying on consent to process your data

## How to exercise your rights

To exercise any of these rights, please contact:

**Mr Anil Mepani (Data Protection Officer)**

- **Email:** dpo@kenilworth.herts.sch.uk
- **Phone:** 0208 953 3459

Or contact the Headteacher in writing.

### Response times:

We will respond to Subject Access Requests within **one calendar month**.

As we have limited staff resources outside of term time, we encourage you to submit Subject Access Requests during term time and avoid sending requests during school holidays where possible. This will help us respond as promptly as possible.

For further information about how we handle Subject Access Requests, please see our Data Protection Policy.

## No fee usually required.

You will not normally have to pay a fee to access your personal information or exercise your other rights. However, we may charge a reasonable fee if your request is manifestly unfounded or excessive, or we may refuse to comply with the request.

## What we may need from you

We may request specific information from you to confirm your identity and ensure your right to access the information. This is a security measure to ensure personal information is not disclosed to unauthorised people.

# Right to withdraw consent

In the limited circumstances where you have provided consent for us to collect, process and transfer your personal information for a specific purpose, you have the right to withdraw your consent at any time.

To withdraw consent, please contact:

**The Headteacher**

- **Email:** admin@kenilworth.herts.sch.uk

**Or contact our Data Protection Officer (details above)**

Once we receive notification that you have withdrawn consent, we will no longer process your information for that purpose, unless we have another legitimate legal basis to do so.

## Right to complain

If you have concerns about how we handle your personal information, please contact us first:

**Mr Anil Mepani (Data Protection Officer)**

- **Email:** dpo@kenilworth.herts.sch.uk
- **Phone:** 0208 953 3459

You also have the right to complain to the Information Commissioner's Office (ICO):

- **Phone:** 0303 123 1113
- **Email:** Via the ICO website at https://ico.org.uk/global/contact-us/email/
- **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- **Website:** https://ico.org.uk/concerns/

## Changes to this privacy notice

We may update this privacy notice at any time. When we make substantial updates, we will provide you with a new notice and may notify you in other ways.

**This notice was last updated in November 2026.**

## Contact us

If you have any questions about this privacy notice, please contact:

**Mr Anil Mepani (Data Protection Officer)**

- **Email:** dpo@kenilworth.herts.sch.uk
- **Phone:** 0208 953 3459