



Saint Jérôme
Church of England
Bilingual School

Privacy Notice for
School Workforce

Notice created:	September 2022
Notice reviewed and updated:	September 2026
Date of next review:	September 2027
Linked policies:	Data Protection Policy, Safer Recruitment and Selection Policy, Whistle-Blowing Policy.

Version history

Date	Version	Summary of changes
September 2022	V1	Original notice.
September 2026	V2	Corrected two typos present throughout the original: the office email address was written as 'stjeromebilingual.orbg', and the DPO's name was written as 'Clarie Mehegan' rather than Claire Mehegan. Fixed a dropped word: 'we reserve the to verify' should read 'we reserve the right to verify'. Updated the Data Protection Rights section to reflect the Data (Use and Access) Act 2025, which introduced the 'reasonable and proportionate search' standard for subject access requests. Updated the Complaints section to note that the Information Commissioner's Office (ICO) becomes the Information Commission from 30 September 2026, while keeping the same contact details, since its functions transfer across unchanged. Put into house format. Corrected the named School Data Protection Lead contact throughout: Natasha McCarthy has left the school, and the current Office Manager is Anne Quigg.

Under data protection law, you have a right to be informed about how the school uses any personal data we hold about you. We comply with this by providing this privacy notice, sometimes called a 'fair processing notice'.

This notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our school.

Saint Jérôme Church of England Bilingual School (the School) is the 'data controller' for the purposes of data protection law. We have appointed Grow Education Partners Ltd, LDBS's GROW service, as our Data Protection Officer (DPO); the responsible contact is Claire Mehegan (see Contact Us below).

The Personal Data We Hold

- Personal information, such as name, date of birth, national insurance number, next of kin, dependents and marital status
- Contact details for you and your emergency contacts
- Protected characteristics, such as trade union membership, nationality, language, ethnic origin, sexual orientation and religion or belief, where provided
- Relevant medical information, such as physical or mental health conditions, including disabilities for which we need to make reasonable adjustments
- Remuneration information, such as salary, annual leave, pension, bank details, payroll records, tax status and benefits
- Information from pre-employment background checks, such as criminal record and online searches
- Recruitment information, such as right to work documentation, references, CVs and cover letters
- Qualifications and employment records, such as work history, job titles, working hours, training records and professional memberships
- Assessments of your performance, such as appraisals, performance reviews and training participation
- Outcomes of any disciplinary and/or grievance procedures, including warnings and related correspondence
- Details of periods of absence, including reasons
- Photographs, for internal safeguarding and security purposes, newsletters, media and promotional purposes
- CCTV footage
- Data about your use of the school's information and communications systems.

We may also hold data from third parties, such as references from former employers and information from pre-employment checks and the Disclosure and Barring Service. A full breakdown of the information we hold can be requested by contacting Anne Quigg, Office Manager, via office@stjeromebilingual.org.

Why We Collect and Use This Information

- Running the school effectively and efficiently
- Enabling you to be paid, and other benefits to be provided
- Facilitating safeguarding as part of our obligations towards pupils
- Fulfilling our legal obligations in recruitment
- Supporting effective performance management and appraisal
- Supporting effective workforce management and implementing school policies
- Providing feedback to training centres and awarding bodies
- Informing our recruitment and retention policies
- Financial modelling, administration and planning
- Providing references where requested
- Equalities monitoring and reporting
- Responding to workforce issues
- Supporting the work of the School Teachers' Review Body

- Assessing the quality of our services
- Complying with the law regarding data sharing.

The Lawful Basis for Using This Data

For personal data generally, we rely on one or more of: fulfilling a contract with you; your consent; necessity to comply with our legal obligations; necessity to protect your vital interests; necessity for tasks in the public interest (the provision of education); or our legitimate interests or those of a third party.

For special category data, we rely on: your explicit consent; necessity for employment, social security and social protection purposes; necessity to fulfil the school's or your obligations; necessity to protect vital interests; processing by a not-for-profit body; or reasons of public interest in public health. Where you have given consent, you may withdraw it at any time.

Collecting This Information

While most information we collect is mandatory, some can be provided voluntarily. We make clear whether providing information is mandatory or optional, and if mandatory, explain the possible consequences of not complying.

How We Store Your Data

We collect, store and process data for each member of the school workforce in a secure virtual or physical file, used only for purposes directly relevant to your employment. Once your employment ends, we retain and delete your file in line with our retention policy, available on request from Anne Quigg, Office Manager.

International Data Transfers

We may send your information to other countries where we, or a company we work with, store information on computer servers based overseas, or where we communicate with you while you are overseas.

We carry out due diligence on the companies we share data with, and note whether they process data in the UK, the EEA (the European Union, Liechtenstein, Norway and Iceland), or outside the EEA. The UK and EEA countries are required to adhere to equivalent data protection standards. For organisations processing data outside the UK and EEA, we assess the circumstances and ensure there is no undue risk, and that adequate legal provisions are in place to transfer data outside the UK.

Who We Share Information With

To function legally, effectively and efficiently, we share data with appropriate third parties, including but not limited to: our local authority, for safeguarding concerns and headteacher performance/dismissal information; the DfE; examining bodies; training centres and awarding bodies; your family and representatives, such as in an emergency; financial organisations such as our pension scheme and HMRC; Ofsted, during an inspection; suppliers and service providers, such as HR, payroll and IT; central and local government, for workforce analysis; our auditors; health authorities and occupational health providers; professional advisers; trade unions and professional associations; charities and voluntary organisations; police forces, courts and security organisations; professional bodies; and employment agencies and future employers, for reference requests.

Why We Share Your Information

We are required to share information about our workforce with our local authority under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007, and with the DfE on a statutory basis, underpinning workforce policy monitoring and school funding assessment. All state-funded schools are required to make a census submission under sections 113 and 114 of the Education Act 2005. Find out more at gov.uk/education/data-collection-and-censuses-for-schools, or about the department's data sharing process at gov.uk/data-protection-how-we-collect-and-share-research-data.

Data Protection Rights

You have a right to make a 'subject access request' to gain access to personal information the school holds about you. If you make a request, and we hold information about you, we will give you a description of it, tell you why we are holding and 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, and let you know whether any automated decision-making is being applied to it. We will not provide information where it would compromise the privacy of others, and will give you a copy of the information in an intelligible form.

Under the Data (Use and Access) Act 2025, which amended the UK GDPR, you are entitled to the personal data we are able to provide based on a reasonable and proportionate search; we are not required to conduct an exhaustive search of every system if doing so would be disproportionate to the request. If we need more information from you to carry out a reasonable search, the one-month response clock pauses until we receive it.

In most cases, we will respond to subject access requests within one month, as required under data protection legislation. We are able to extend this period by up to two months for complex requests or exceptional circumstances.

Your other rights regarding your data include the ability to:

- Withdraw your consent to processing at any time, where the school relies on consent as its lawful basis
- Ask us to rectify, erase or restrict processing of your personal data, or object to it in certain circumstances
- Prevent the use of your personal data for direct marketing
- Challenge processing justified on the basis of public interest, official authority or legitimate interests
- Request a copy of agreements under which your personal data is transferred outside the United Kingdom
- Object to decisions based solely on automated decision-making or profiling
- Request that we cease processing likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Submit a complaint to us, and if you remain dissatisfied, to the regulator
- Ask for your personal data to be transferred to a third party in a structured, commonly used, machine-readable format, in certain circumstances.

If you would like to exercise any of these rights, please contact Anne Quigg, Office Manager: Email: office@stjeromebilingual.org. Phone: 020 3019 6363. Post: Saint Jérôme Church of England Bilingual School, 120–138 Station Road, Harrow HA1 2DJ.

We will comply with data protection legislation in dealing with all requests submitted in any format, though individuals are asked to preferably submit requests in writing to assist with comprehension. We reserve the right to verify the requester's identity by asking for photo ID; if this proves insufficient, further identification may be required.

Data Protection Breaches

If you suspect that your or someone else's data has been subject to unauthorised or unlawful processing, accidental loss, destruction or damage, please contact Anne Quigg, Office Manager without undue delay.

Complaints

We take any complaints about our collection and use of personal information very seriously. If you think our collection or use of personal information is unfair, misleading or inappropriate, or you have any other concern, please raise this with us in the first instance.

To make a complaint, please contact our Data Protection Officer, Claire Mehegan, LDBS's GROW Data Protection Officer, at claire.mehegan@london.anglican.org, or 0207 932 1100, LDBS, 36 Causton Street, London SW1P 4AU.

Alternatively, if you remain dissatisfied, you can refer a complaint to the regulator, currently known as the Information Commissioner's Office (ICO), becoming the Information Commission from 30 September 2026:

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

Contact Us

If you have any questions, concerns or would like more information about anything in this privacy notice, please contact either our School Data Protection Lead, Anne Quigg, Office Manager, or our Data Protection Officer, Claire Mehegan, LDBS's GROW Data Protection Officer, at claire.mehegan@london.anglican.org, or 0207 932 1100.