



DANES HILL SCHOOL

Privacy Notice for Staff and Job Applicants

(The word "staff" used in this context, also refers to governors, trustees, volunteers, peris and other contractors)

Author/Reviewer responsible:	HR Director	Date of review:	August 2025
Reviewed by:	People Governance and Risk Committee HR Director & Data Protection Lead	Date of authorisation: no changes	October 2023 Minor changes approved October 2025
		Date of next review:	September 2027

Summary of changes

August and October 2025	<ul style="list-style-type: none">• Change to document title to highlight inclusion of job applicants as well as current staff.• Updating of relevant staff job titles.
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<p>1. Purpose</p>	<p>1.1. In the course of work undertaken for the School, the School will collect, use and hold (“process”) personal data relating to members of our staff or wider school teams, regardless of employment status. This makes the School a data controller of their personal information, and this Privacy Notice sets out how the School will use that information and what individual rights are.</p>
<p>2. Scope</p>	<p>2.1. This notice applies to staff at Danes Hill School (the “School”), including: employees, contractors, visiting music teachers and other peripatetic workers, casual workers, temps, governors, trustees and volunteers who may be employed or engaged by the School to work for it in any capacity, as well as prospective applicants for roles.</p> <p>2.2. References to "employment", “staff” etc. in this Notice are not intended to imply or confer any employment rights to contractors, non-employed workers, volunteers or job applicants.</p> <p>2.3. It is not contractual and may be amended by the School from time to time.</p>
<p>3. Privacy notice</p>	<p>3.1. This Staff and Job Applicant Privacy Notice explains how the School collects, uses and shares (or "processes") personal data of staff, and the rights of staff rights in relation to the personal data held.</p> <p>3.2. This Privacy Notice applies in addition to the School's other relevant terms and conditions and policies that may apply, including:</p> <p>3.2.1.any contract between the School and its staff, such as the terms and conditions of employment, Staff Code of Conduct and any applicable staff policies;</p> <p>3.2.2.the School’s CCTV Policy;</p> <p>3.2.3.the School’s Information and Records Retention Policy;</p> <p>3.2.4.the School's disciplinary, safeguarding, pastoral, anti-harassment and dignity at work, or health and safety policies, including as to how concerns, low-level concerns or incidents are reported or recorded (both by and about staff);</p> <p>3.2.5.the School’s Overarching Data Protection Policy; and</p> <p>3.2.6.the School's IT policies, including in relation to acceptable use, e-safety, social media, Wi-Fi, remote working and use of own devices.</p> <p>3.3. Please note that any contract held with the School will be relevant to how the School processes an employee’s data, in accordance with any relevant rights or obligations under that contract. However, this Staff and Job Applicant Privacy Notice is the primary document by which staff and job applicants are notified about the use of their personal data by the School.</p> <p>3.4. This Privacy Notice also applies alongside any other information the School may provide about particular uses of personal data, for example when collecting data via an online or paper form.</p>
<p>4. How the School collects information</p>	<p>4.1. The School may collect staff personal data in a number of ways, for example:</p> <p>4.1.1.from information provided before making a job application, for example from an informal visit;</p>

	<p>4.1.2.when staff submit a formal application to work for the School, and provide personal data in application forms and covering letters, or in a self-declaration, etc.; and</p> <p>4.1.3.from third parties, for example the Disclosure and Barring Service (DBS) and referees (including previous or current employers or school), or from third party websites (as part of online suitability checks for shortlisted candidates) or (for contractors or substitutes) their own employer or agent, in order to verify details about the member of staff and/or their application to work for us.</p> <p>4.2. More generally, during the course of employment with the School, as a member of staff, data will be collected about the employee, including:</p> <p>4.2.1.when they provide or update contact details;</p> <p>4.2.2.when they or another member of staff completes paperwork regarding performance appraisals;</p> <p>4.2.3.in the course of employment (or equivalent) duties more generally, including by filling reports, note taking, or sending emails on School systems;</p> <p>4.2.4.in various other ways as a member of staff interacts during employment, and afterwards, where relevant, for the various purposes set out below.</p>
<p>5. The types of information collected</p>	<p>5.1. The School may collect the following types of personal data about members of staff (and their family members and 'next of kin', where relevant):</p> <p>5.1.1.contact and communications information, including:</p> <p>5.1.1.1. contact details (including email address(es), telephone numbers and postal address(es);</p> <p>5.1.1.2. contact details (through various means, as above) for family members and 'next of kin', in which case the member of staff confirms that they have the right to pass this information to the School for use in accordance with this Privacy Notice;</p> <p>5.1.1.3. records of communications and interactions the School has had with the member of staff;</p> <p>5.1.2.biographical, educational and social information, including:</p> <p>5.1.2.1. name, title, gender, nationality and date of birth;</p> <p>5.1.2.2. image and likeness, including as captured in photographs taken for work purposes;</p> <p>5.1.2.3. details of education and references from institutions of study;</p> <p>5.1.2.4. lifestyle information and social circumstances;</p> <p>5.1.2.5. interests and extra-curricular activities;</p> <p>5.1.2.6. information in the public domain, including information posted to social media, where relevant to the role (e.g. as part of pre-employment screening);</p> <p>5.1.3.financial information, including:</p>

	<p>5.1.3.1. bank account number(s), name(s) and sort code(s) (used for paying salary or invoices and processing other payments);</p> <p>5.1.3.2. tax status (including residence status);</p> <p>5.1.3.3. information related to pensions, national insurance, or employee benefit schemes;</p> <p>5.1.4.work related information, including:</p> <p>5.1.4.1. details of work history and references from previous employer(s);</p> <p>5.1.4.2. personal data captured in the work product(s), notes and correspondence created while employed by or otherwise engaged to work for the school;</p> <p>5.1.4.3. details of professional activities and interests;</p> <p>5.1.4.4. involvement with and membership of sector bodies and professional associations;</p> <p>5.1.4.5. information about employment and professional life after leaving the School, where relevant (for example, where the member of staff has asked the School to keep in touch);</p> <p>5.1.4.6. nationality and other immigration status information (i.e. about entitlement to work in the UK), including copies of passport information (if applicable);</p> <p>5.1.5.and any other information relevant to employment or other engagement to work for the School.</p> <p>5.2. Where this is necessary for employment or other engagement to work for the School, special categories of data, and information about criminal convictions and offences may be collected and held, including:</p> <p>5.2.1.information concerning racial or ethnic origin;</p> <p>5.2.2.trade union membership, where applicable;</p> <p>5.2.3.information concerning health and medical conditions (for example, where required to monitor and record sickness absences, dietary needs, or to make reasonable adjustments to working conditions or environment);</p> <p>5.2.4.biometric information, for example where necessary for school security systems;</p> <p>5.2.5.information concerning sexual life or orientation (for example, in the course of investigating complaints made by the member of staff or others, for example concerning discrimination); and</p> <p>5.2.6.information about certain criminal convictions (for example, where this is necessary for due diligence purposes, whether by self-declaration or otherwise, or for compliance with legal and regulatory obligations);</p> <p>5.3. However, this will only be undertaken where and to the extent it is necessary for a lawful purpose in connection with the member of staff's employment or other engagement to work for the School.</p>
<p>6. Bases for processing personal</p>	<p>6.1. Entering into, or fulfilling, the contract</p> <p>6.2. The School processes a member of staff's personal data because it is necessary for the performance of the contract to which they are a party or</p>

<p>data, how the data is used and who it is shared with</p>	<p>in order to take steps at their request prior to entering into a contract, such as a contract of employment or other engagement with the School. In this respect, depending on role and status, the School is likely to use personal data for the following purposes:</p> <ul style="list-style-type: none"> 6.2.1.administering job applications and, where relevant, offering a role with the School; 6.2.2.carrying out due diligence checks, whether during the application process for a role or during their engagement, including by checking references in relation to education and employment history and obtaining any required self-declarations; 6.2.3.once they are employed or engaged by the School in any capacity, for the performance of the contract of employment (or other agreement) between the parties; 6.2.4.to make payment and to administer benefits (including pensions) in connection with employment or other engagement; 6.2.5.monitoring attendance and performance in work, including in performance appraisals; 6.2.6.promoting the School to prospective parents and others, including by publishing the work product(s) created while employed by or otherwise engaged to work for the School; 6.2.7.for disciplinary purposes, including conducting investigations where required; 6.2.8.for other administrative purposes, for example to update members of staff about changes to terms and conditions of employment or engagement, or changes to pension arrangements; 6.2.9.for internal record-keeping, including the management of any staff feedback or complaints and incident reporting; and 6.2.10. for any other reason or purpose set out in an employment or other contract with the School. <p>6.3. (ii) Legitimate Interests</p> <p>6.4. The School processes a member of staff's personal data because it is necessary for the School's (or sometimes a third party's) legitimate interests. The School's "legitimate interests" include interests in running the School in a professional, sustainable manner, in accordance with all relevant ethical, educational, charitable, legal and regulatory duties and requirements (whether or not connected directly to data protection law). In this respect, depending on role and status, the School is likely to use a member of staff's personal data for the following:</p> <ul style="list-style-type: none"> 6.4.1.providing them with information about the School and what it is like to work there (where they have asked for this, most obviously before they have made a formal application to work for the School); 6.4.2.for security purposes, including by operating security cameras in various locations on the School's premises; 6.4.3.to enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate; 6.4.4.to provide education services to pupils, including where such services are provided remotely (either temporarily or permanently);
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	<p>6.4.5. to carry out or cooperate with any School or external complaints, disciplinary or investigatory process;</p> <p>6.4.6. for the purposes of management planning and forecasting, research and statistical analysis;</p> <p>6.4.7. in connection with organising events and social engagements for staff;</p> <p>6.4.8. making travel arrangements on their behalf, where required;</p> <p>6.4.9. contacting the member of staff or their family members and 'next of kin' for business continuity purposes, to confirm absence from work, etc.;</p> <p>6.4.10. publishing their image and likeness in connection with their employment or engagement with the School;</p> <p>6.4.11. to monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's policies and government guidance such as Keeping Children Safe in Education.</p> <p>6.5. (iii) Legal Obligations</p> <p>6.6. The School also processes personal data for compliance with legal obligations, notably those in connection with employment, charity / company law, tax law and accounting, and child welfare. In this respect, depending on role and status, the School is likely to use personal data for the following:</p> <p>6.7. to meet legal obligations: for example, relating to child welfare (including following the requirements and recommendations of KCSIE), social protection, diversity, equality, and gender pay gap monitoring, employment, immigration / visa sponsorship compliance and health and safety);</p> <p>6.8. for tax and accounting purposes, including transferring personal data to HM Revenue and Customs to ensure that staff have paid appropriate amounts of tax, and in respect of any Gift Aid claims, where relevant;</p> <p>6.9. for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.</p> <p>6.10. (iv) Special categories of data</p> <p>6.11. Depending on role and status, the School processes special categories of personal data (such as data concerning health, religious beliefs, racial or ethnic origin, sexual orientation or union membership) or criminal convictions and allegations (treated for these purposes as special category data) for the reasons and purposes set out below.</p> <p>6.12. In particular, the School processes the following types of special category personal data for the following reasons:</p> <p>6.12.1. physical or mental health or condition(s) in order to record sick leave and take decisions about fitness for work, or (in emergencies)</p>
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	<p>act on any medical needs. This may include Covid-19 (or similar) testing: including managing on-site testing and/or processing the results of tests taken by staff, and sharing this information with relevant health authorities;</p> <p>6.12.2. recording racial or ethnic origin in order to monitor compliance with equal opportunities legislation;</p> <p>6.12.3. trade union membership, in connection with rights as an employee, agent or contractor and the School’s obligations as an employer or engager of services;</p> <p>6.12.4. categories of personal data which are relevant to investigating complaints made by the member of staff or others, for example concerning discrimination, bullying or harassment, or as part of a complaint made against the School;</p> <p>6.12.5. data about any criminal convictions or offences committed by Staff, for example when conducting criminal background checks with the DBS, or via a self-declaration, or where a matter of public record (online or by any media), or where it is necessary to record or report an allegation (including to police or other authorities, with or without reference to the member of staff);</p> <p>6.13. The School processes special categories of personal data for lawful reasons only, including because:</p> <p>6.13.1. they have given explicit consent to do so, but only in circumstances where seeking consent is appropriate;</p> <p>6.13.2. it is necessary to protect the member of staff or another person's vital interests, for example, where they have a life-threatening accident or illness in the workplace and the School has to process personal data to ensure they receive appropriate medical attention;</p> <p>6.13.3. it is necessary for the purposes of carrying out legal obligations and exercising legal rights (both the member of staff and the School) in connection with their employment or engagement;</p> <p>6.13.4. it is necessary in connection with some function in the substantial public interest, including:</p> <p>6.13.4.1. the safeguarding of children or vulnerable people; or</p> <p>6.13.4.2. to prevent or detect unlawful acts; or</p> <p>6.13.4.3. as part of a function designed to protect the public, pupils or parents from seriously improper conduct, malpractice, incompetence or unfitness in a role, or failures in services by the School (or to establish the truth of any such allegations); or</p> <p>6.13.4.4. to cooperate with a relevant authority, professional or regulatory body (such as the ISI, DfE, LADO or TRA) in such matters</p> <p>6.13.5. to comply with public health requirements (e.g. in respect of Covid-19 (or in similar circumstances)); or</p> <p>6.13.6. it is necessary for the establishment, exercise or defence of legal claims, such as where any person has brought a claim or serious complaint against the School or member of staff.</p>
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	<p>6.14. (v) Low-level concerns (neutral notifications) about adults</p> <p>6.15. The School processes personal data about members of staff, whether or not it constitutes special category data, in accordance with the policy on recording and sharing low-level concerns about adults. This is processed for the same safeguarding and/or employment law reasons as set out above.</p> <p>6.16. Such records are subject to the rules on retention set out in the School’s Information and Records Retention Policy and the same rights apply in respect of that information, as any other personal data that held. However, any requests to access, erase or amend personal data the School holds in accordance with this policy may be subject to necessary exemptions, for example if it is considered that compliance with the request might unreasonably impact the privacy rights of others or give rise to a risk of harm to children.</p> <p>6.17. As a general rule, records of low-level concerns will be kept for up to 7 years following the termination of employment, but may need to be retained longer: e.g. where relevant, individually or cumulatively, to any employment, disciplinary or safeguarding matter. Low-level concerns will not be included in references unless they relate to issues which would normally be included in references, for example, misconduct or poor performance.</p>
<p>7. Sharing information with others</p>	<p>7.1. For the purposes referred to in this privacy notice and relying on the grounds for processing as set out above, the School may share personal data with certain third parties. The School may disclose limited personal data (including in limited cases special category or criminal data) to a variety of recipients including:</p> <ul style="list-style-type: none"> 7.1.1. other employees, agents and contractors (e.g. third parties processing data on the School’s behalf as part of administering payroll services, the provision of benefits including pensions, IT etc. – although these are considered data processors on our behalf); 7.1.2. DBS and other government authorities (e.g. HMRC, DfE, CAF/CASS, police, Home Office, a relevant public health / NHS body and / or local authority) and/or appropriate regulatory bodies e.g. the Teaching Regulation Agency, the Independent Schools Inspectorate, the Charity Commission etc.; 7.1.3. external auditors or inspectors; 7.1.4. advisers where it is necessary for the School to obtain their advice or assistance, including insurers, lawyers, accountants, or other external consultants; 7.1.5. third parties and their advisers in the unlikely event that those third parties are acquiring or considering acquiring all or part of the School, or setting up joint working or partnership arrangement in the UK or abroad; 7.1.6. when the School is legally required to do so (by a court order, government body, law enforcement agency or other authority of

	<p>competent jurisdiction), for example HM Revenue and Customs or police.</p> <p>7.2. The School may also share information about members of staff with other employers in the form of a reference, where it is considered appropriate, or where required to do so in compliance with legal obligations. References given or received in confidence may not be accessible under UK GDPR rights.</p>
<p>8. How long information is kept</p>	<p>8.1. Personal data relating to unsuccessful job applicants is deleted within 12 months of the end of the application process, except where it has been mutually agreed to keep it for longer.</p> <p>8.2. Subject to any other notices provided, the School may retain personal data for a period of 7 years after a member of staff's contract has expired or been terminated.</p> <p>8.3. However, some information may be retained for longer than this, for example incident reports and safeguarding files, in accordance with specific legal requirements.</p>
<p>9. Staff rights</p>	<p>9.1. Members of staff or contractors have the following rights:</p> <p>9.1.1.to obtain access to, and copies of, the personal data that held about them;</p> <p>9.1.2.to require the School to correct the personal data held about them if it is incorrect;</p> <p>9.1.3.to require the School (in certain circumstances) to erase their personal data;</p> <p>9.1.4.to request that the School restricts data processing activities (and, where processing is based on consent, withdraw that consent, without affecting the lawfulness of processing based on consent before its withdrawal);</p> <p>9.1.5.to receive from the personal data the School holds about them which they provided, in a reasonable format specified by them, including for the purpose of transmitting that personal data to another data controller;</p> <p>9.1.6.to object to any of the School's particular processing activities where they feel this has a disproportionate impact on their rights.</p> <p>9.2. Please note that the above rights are not absolute, and the School may be entitled to refuse requests where exceptions apply. The School will endeavour to respond to any such requests as soon as is reasonably practicable and in any event within statutory time-limits.</p> <p>9.3. Details about rights under applicable data protection legislation can be found at the Information Commissioner's Office website available at www.ico.org.uk.</p>

10. This notice	10.1. The School will update this Staff and Job Applicant Privacy Notice from time to time.
11. Contact and complaints	<p>11.1. Any queries about this privacy notice or how the School processes personal data, or to exercise any individual rights under applicable law, should be directed to the Privacy Officer (the HR Director & Data Protection Lead) or through the Staff Grievance Procedure.</p> <p>11.2. A member of staff who remains unsatisfied with how the School processes their personal data, or how the School deals with their complaint, can make a complaint to the Information Commissioner: www.ico.org.uk. The ICO does recommend they seek to resolve any issues with the data controller initially prior to any referral.</p>
12. Related documents	<p>12.1. Data Protection Policy and Procedure</p> <p>12.2. Whistleblowing Policy and Procedure</p> <p>12.3. Staff Grievance Procedure</p> <p>12.4. Information and Records Retention Policy</p> <p>12.5. Staff Recruitment Policy and Procedure</p>