



KEW COLLEGE

Privacy Notice – Staff

Definitions or abbreviations used in this Privacy Notice

Staff including current, former and prospective: employees, self-employed contractors, visiting music teachers and other peripatetic workers, casual workers, temps, volunteers, governors and 3rd party provider who may be employed or engaged by the School to work for it in any capacity, as well as prospective applicants for roles.

DSL: Deputy Safeguarding Lead

LADO: Local Authority Designated Officer

The School: Kew College Prep

1. WHO WE ARE

We are Kew College Prep, a company registered in England and Wales (the School). Our company registration number is 1678837 (registered as Kew College), our charity registration number is 286059, and our registered address is at:

24-26 Cumberland Road
Richmond
TW9 3HQ

In the course of your work undertaken for the School, we will collect, use and hold (“process”) personal data relating to you as a member of our staff or wider school team, regardless of your employment status. This makes the School a controller of your personal information, and this Privacy Notice sets out how we will use that information and what your rights are.

2. WHO THIS NOTICE APPLIES TO

This notice applies to staff at the School (as defined in “definitions or abbreviations” above). Please note that references to “employment”, “staff” etc in this Privacy Notice are not intended to imply or confer any employment rights to you if you are a contractor, non-employed worker or job applicant.

3. ABOUT THIS NOTICE

This Privacy Notice explains how the School processes your personal data and your rights in relation to the personal data we hold about you.

This Privacy Notice applies in addition to the School’s other relevant terms and conditions and policies that may (depending on your role and status) apply to you, including:

- Any contract between you and the School, such as the terms and conditions of employment, and including the staff ***Code of Conduct*** and ***Employee Handbook***;
- The School’s ***CCTV Policy***

- The School's **Record Retention Schedule** and **Record Management Guidelines**
- The School's disciplinary, safeguarding, pastoral, anti-bullying and health and safety policies, including as to how concerns, low-level concerns or incidents are reported or recorded (both by and about staff)
- The School's **Data Protection Policy**
- The School's IT policies, including **AI Policy, Social Media Policy, Online Safety Policy**

Please note that any contract you may have with the School will be relevant to how the School processes your data, in accordance with any relevant rights or obligations under that contract. However, this Staff Privacy Notice is the primary document by which we notify you about the processing of your personal data by the School.

This Staff 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.

4. RESPONSIBILITY FOR DATA PROTECTION

The School has appointed two Privacy Officers, one for systems and IT-related matters, the other for operational matters.

The Privacy Officers, together with the Bursar & Clerk to the Governors will deal with all your requests and enquiries concerning the School's uses of your personal data (see section on 'Your Rights' below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law (see section 13 for contact details).

5. HOW WE COLLECT YOUR INFORMATION

Before you are employed or engaged by the School, we may collect your personal data in a number of ways, for example:

- from the information you provide to us before making a job application;
- when you submit a formal application to work for us, and provide your personal data in application form, self-declaration etc;
- when you attend an interview;
- from third parties, for example: the Disclosure and Barring Service (DBS); referees; third party websites;
- If you are a contractor or agency worker, from your own employer or agent.

During the course or your employment or engagement with us, we will collect data from or about you, including:

- When you provide or update your contact details;
- When you or another member of staff completes paperwork regarding your performance appraisals;
- In the course of fulfilling your employment (or equivalent) duties more generally, including by note taking or sending emails on the school systems;
- In various other ways as you interact with us during your time as a member of staff, and afterwards, where relevant, for the various purposes set out below.

6. TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

We may collect the following types of personal data about you (and your family members and next of kin, where relevant). The type of personal information we process is limited to that needed to manage your specific work assignment:

- Identification data: names, title, addresses, gender, nationality, photograph, date of birth, telephone numbers, e-mail addresses
- Contact details: home and business address, telephone numbers, email addresses, emergency contact details
- Employment details: job title/position, employment contract, training records, performance (including appraisals) and disciplinary records, grievance procedures, sickness/holiday records
- Background information: academic/professional qualifications, education, CV, criminal records data, references, right to work (for vetting purposes, where permissible and in accordance with applicable law)
- Marital status; spouse & dependents information (where applicable)
- Financial information: banking details, tax information, withholdings, salary, benefits, pensions, national insurance, expenses, allowances
- IT information: information required to provide access to our IT systems and networks such as IP addresses, log files and login information, use of IT systems
- Your personal data captured in the work product(s), notes and correspondence you create while employed by or otherwise engaged in work for the School
- Images of employees engaging in School activities, and images captured by the School's CCTV system (in accordance with the School's policies on Taking, Storing and Using images of Pupils and CCTV Policy)
- Information in the public domain, including information you may have posted to social media, where relevant to your role (e.g.as part of pre-employment screening)
- Details of any disciplinary matters or grievances which you raise or which relate to you

The School tries not to collect or process any sensitive personal information about you, unless authorised by law or where necessary to comply with applicable laws. In some circumstances, we may need to collect some sensitive personal information for legitimate employment-related purposes, for example:

- data relating to your racial/ethnic origin, gender and disabilities for the purposes of:
 - equal opportunities monitoring
 - to comply with anti-discrimination laws
 - for government reporting obligations
- data relating to your physical or mental health to:
 - provide work-related accommodations
 - health and insurance benefits to you and your dependents
 - to manage absences from work

- information about certain criminal convictions where this is necessary for due diligence purposes or for compliance with our legal and regulatory obligations.

7. THE BASES FOR PROCESSING YOUR PERSONAL DATA, AND HOW THE DATA IS USED

In order to carry out its ordinary duties to staff (including current, past and prospective staff), the School needs to process a wide range of personal data about individuals as part of its daily operation.

i. Entering into, or fulfilling our contract with you

We process your personal data because it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, such as a contract of employment or other engagement with us. In this respect, depending on your role and status, we are likely to use your personal data for the following purposes:

- Administering job applications, and where relevant, offering you a role with us
- Carrying out due diligence checks on you, whether during the application process for a role with us or during your engagement with us, including by checking references in relation to your education and your employment history and obtaining any required self-declarations
- Once you are employed or engaged by us in any capacity, for the performance of the contract of employment (or other agreement) between you and us
- To pay you and to administer benefits (including pensions) in connection with your employment or other engagement with us
- Monitoring your attendance and your performance at work, including in performance appraisals
- Monitoring your use of our IT systems to ensure compliance with our policies
- To assess and make decisions about your fitness to work, training and development requirements
- To promote the School to prospective parents and others
- For disciplinary purposes, including conduction investigations where required
- For other administrative purposes, for example to update you about changes to your terms and conditions of employment or engagement, or changes to your pension arrangements
- For internal record-keeping, including the management of any staff feedback or complaints and incident reporting
- For any other reason or purpose set out in your employment or other contract with us.

ii. Legitimate interests

We process your personal data because it is necessary for our (or sometimes a third party's) legitimate interests. Our legitimate interests include our interests in running the School in a professional, sustainable manner, in accordance with all relevant ethical, education, charitable, legal and regulatory duties and requirements (whether or not directly connected to data protection law). In this respect, depending on your role and status, we are likely to use your personal data for the following:

- To provide you with information about us and what it is like to work for us (where you have requested this, for example before making a formal job application)
- For safety and security purposes, including by operating security cameras in various locations on the School's premises – see **CCTV Policy**
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate
- To provide education services to pupils, including where such services are provided remotely (either temporarily or permanently)
- To safeguard staff and pupils' health and welfare and provide appropriate pastoral care
- To carry out or co-operate with any School or external complaints, disciplinary or investigatory process
- For the purposes of management planning and forecasting, research and statistical analysis
- In connection with organising events and social engagements for staff
- To make travel arrangements on your behalf, where required
- To contact you or your family members and 'next of kin' for business continuity purposes, to confirm your absence from work, etc
- To publish your image and likeness in connection with your employment or engagement with us
- To monitor (as appropriate) use of the School's IT and communications systems. The IT Department will observe the strictest confidentiality when undertaking these activities. They will make any report directly to the DSL and/or Head who will determine the actions that may need to be taken in any particular case.

iii. Legal Obligations

We also process your personal data for our compliance with our legal obligations, notably those in connection with employment, charity/company law, tax law and accounting, and child welfare. In this respect, depending on your role and status, we are likely to use your personal data for the following:

- Child welfare (including following the requirements and recommendations of KCSIE), social protection, diversity, equality, and gender pay gap monitoring, employment, immigration compliance, and health and safety
- For tax and accounting purposes, including transferring personal data to HMRC
- Compliance with our data protection obligations, including responding to subject access requests from third parties. Please note in this regard that there is a statutory assumption of reasonableness in disclosing staff data under a subject access request, where mixed with that of the requestor. However, there may be situations where the School redacts staff data, for example if it does not obviously relate to their professional role, or if the request is not made by, or on behalf of, a pupil in that person's care
- 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.

iv. Special category personal data

Depending on your role and status, we process special categories of personal data (such as data concerning health, religious beliefs, racial or ethnic origin, gender, sexual orientation) or criminal convictions and allegations (treated for these purposes as special category data) for the reasons and purposes set out below:

- To provide appropriate medical care where necessary, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, and cooperation with police or social services, for insurance purposes or to caterers or organisers of School trips who need to be made aware of dietary or medical needs
- In connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans
- As part of any School or external complaints, disciplinary or investigation process that involves such data, for example concerning discrimination, bullying or harassment
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care

v. Low-level concerns about adults

We will process personal data about you, whether or not it constitutes special category data, in accordance with our policy on recording and sharing low-level concerns about adults (included in **Appendix 2 Safeguarding and Child Protection Policy**). This will be processed for the same safeguarding and/or employment law reasons as set out above.

Such records are subject to the rules on retention set out in the above-named policy, and you have same rights in respect of that information as any other personal data that we hold on you. However, any requests to access, erase or amend personal data we hold in accordance with this policy may be subject to necessary exemptions, for example, if we consider that compliance with the request might unreasonable impact the privacy rights of others or give rise to harm to children.

8. WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH

Personal data collected by the School will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Personal data will only be processed by third parties who have a legitimate purpose for accessing it. Whenever the School permits a third party to access personal information, we implement appropriate measures to ensure the data is used in a manner consistent with this Notice and that the security and confidentiality of the data is maintained. Personal data shared with third parties may include, in limited circumstances, special category or criminal data.

i. Transfers to third-party service providers

We use a number of trusted third-party service providers ("data processors") to support the delivery of our services and fulfil our operational and legal obligations. These include Microsoft (IT systems, email and document storage), SchoolBase (management information systems), Sage HR (staff HR records), Smart Pension and the Teachers' Pension Scheme (pension administration), iHasco (staff training), Smart Clinic (medical or occupational health services), My New Term (recruitment), Sign In SCR (safeguarding records), Atlantic Data (background and DBS checks), Invenity (site access

management system), Cyclescheme / BHN extras and GreenPay (payroll services). These providers process personal data on our behalf under contractual agreements that include appropriate data protection safeguards and only act on our instructions. Where required, data may be transferred outside the UK; in such cases, we ensure appropriate protections are in place in accordance with UK data protection law.

ii. Transfers to other third parties

These would include:

- DBS and other government authorities (eg DfE, CAFCASS, police, Home Office, relevant public health / NHS body, local authorities) and/or appropriate regulatory bodies (eg Independent Schools Inspectorate)
- External auditors or inspectors
- Our advisers where it is necessary for us to obtain their advice or assistance, including insurers, lawyers, accountants, or other external consultants
- 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 we are reconstituting or setting up some form of joint working or partnership arrangement
- When the school is legally required to do so (by a court order, government body, law enforcement agency or other authority of competent jurisdiction), for example HMRC or police

We may also share information about you with other employers in the form of a reference, where we consider it appropriate, or if we are required to do so in compliance with our legal obligations. References given or received in confidence may not be accessible under your UK data protection rights.

9. HOW LONG WE KEEP PERSONAL DATA

For everyone other than job applicants, subject to any other notices that we may provide to you, we may retain your personal data for a period of 7 years following your departure from the School. However, some information may be retained for longer than this, for example incident reports and safeguarding files, in accordance with specific legal requirements.

Kew College has a Record Management Guideline for identifying, retaining, protecting, storing and disposing of records and documents ("Records") belonging to the School. Protection of Records is a key element of corporate security and the responsibility of all staff. Good Record Retention and appropriate disposal of Records are essential components of the School's commitment to integrity, the effective overall management of the School, and compliance with regulatory and legal obligations.

Personal data relating to unsuccessful job applicants will be kept for 12 months after the end of the application process, except where we have notified you we intend to keep it for longer, and you have not objected.

10. YOUR RIGHTS

You have the following rights:

- To obtain access to, and copies of, the personal data that we hold about you
- To require us to correct the personal data that we hold about you if it is incorrect
- To require us (in certain circumstances) to erase your personal data
- To request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal)
- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller
- To object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we 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 (generally 1 month, but in order to fulfil more complex or multiple requests, the time may be extended by up to a further two months, in accordance with data protection law).

The School is best placed to respond promptly to focused and specific requests for information. Where a request is considered manifestly unfounded, excessive, or repetitive, the School may ask you to refine the scope of your request. In certain circumstances, and where permitted by data protection law and relevant regulatory guidance, the School may also charge a reasonable fee to cover administrative costs associated with processing the request.

Any individual who wishes to access their personal data, request its correction or transfer to another organisation, or object to how their personal data is processed, should submit their request in writing to the Bursar (see contact details at the end of this document).

You can find out more about your rights under applicable data protection legislation from the ICO website at [Information Commissioner's Office](#)

11. THIS NOTICE

The School will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly, as far as is reasonably practicable. This Privacy Notice was last updated on 17 June 2026.

12. QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the Bursar using the contact details below.

If an individual believes that the School has not complied with this Privacy Notice or acted otherwise than in accordance with data protection law, they should notify the Bursar using the contact details below. The School will acknowledge your complaint within 30 days of receipt and will investigate and inform you of the outcome of your complaint without undue delay (keeping you informed of progress as necessary).

If you are not satisfied with the outcome of your complaint, or if you feel that the School has not handled it appropriately, you have the right to complain to the [Information Commissioner's Office](#)

13. CONTACT DETAILS

Bursar and Clerk to the Governors: Lucas Carlisle (email: lcarlisle@kewcollegeprep.com or TEL: 020 8940 2039)

Or write to the above at:

Kew College Prep
24-26 Cumberland Road
Kew
Surrey
TW9 3HQ