Privacy Notice for Staff

Policy date:	January 2026
Date of next review:	June 2027
Owner:	Chief Financial and Operations Officer
Leadership Team:	Operations Leadership Team
Intended audience:	All Staff and Governors
Location:	School Portal, Governor Portal and Website

1. Staff Privacy Notice

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

2. Who this notice applies to

2.1. This notice applies to staff at the School, including employees, governors/trustees, contractors, visiting music teachers and other peripatetic workers, casual workers, temps, 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.

2.2. (Please note that references to "employment", "staff" etc. in this Notice are for simplicity and are not intended to imply or confer any employment rights on persons who are a contractor, non-employed worker, or job applicant.)

3. About this Notice

3.1. This Staff Privacy Notice explains how the School collects, uses and shares (or "processes") personal data of staff, and your rights in relation to the personal data held.

3.2. 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 the School and its staff, such as terms and conditions of employment, Staff Code of Conduct and the Staff Handbook;
- the School's CCTV Policy;
- the School's Data Retention Policy;
- the School's disciplinary, safeguarding, pastoral, anti-bullying, or health and safety policies, including as to how concerns, low-level concerns or incidents are reported or recorded (both by and about staff); and
- the School's IT policies, including its ICT Acceptable Use policy, Social Media Policy, and Remote Working Policy.

3.3. 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 you are notified about the use of your personal data by the School.

3.4. 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. How we collect your information

4.1. The School may collect your personal data in a number of ways, for example:

- when you submit a formal application to work for the School, and provide your personal data in application forms and covering letters, or when you complete a self-declaration, etc.;

- from the information you provide during the job application process, for example when you come for an interview;
- from third parties, for example the Disclosure and Barring Service (DBS) and referees (including your previous or current employers or school), or from third party websites (as part of online suitability checks for shortlisted candidates) or (if you are a contractor) your own employer or agent, in order to verify details about you and/or your application to work for us.

4.2. More generally, during the course of your employment, as a member of staff, the School 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 filling reports, note taking, or sending emails on 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.

5. The types of information we collect

5.1. We may collect the following types of personal data about you (and your family members and 'next of kin', where relevant):

- contact and communications information, including:
  - your contact details (including email address(es), telephone numbers and postal address(es);
  - contact details (through various means, as above) for your family members and 'next of kin', in which case you confirm that you have the right to pass this information to the School for use by it in accordance with this Privacy Notice;
  - records of communications and interactions the School has had with you;
- biographical, educational and social information, including:
  - your name, title, gender, nationality and date of birth;
  - your image and likeness, including as captured in photographs taken for work purposes;
  - details of your education and references from your institutions of study;
  - lifestyle information and social circumstances;
  - your interests and extracurricular activities;
  - 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);
- financial information, including:
  - your bank account number(s), name(s) and sort code(s) (used for paying your salary or invoices and processing other payments);
  - your tax status (including residence status);
  - Gift Aid declaration information, where relevant (for example, where the School helps you to administer donations to charity from your pre-taxed earnings);

- information related to pensions, national insurance, or employee benefit schemes;

- work related information, including:
  - details of your work history and references from your previous employer(s);
  - your personal data captured in the work product(s), notes and correspondence you create while employed by or otherwise engaged to work for the School;
  - details of your professional activities and interests;
  - your involvement with and membership of sector bodies and professional associations;
  - information about your employment and professional life after leaving the School where relevant (for example, where you have asked us to keep in touch with you);
  - nationality and other immigration status information (i.e. about your entitlement to work in the UK), including copies of passport information (if applicable);
- and any other information relevant to your employment or other engagement to work for the School.

5.2. Where this is necessary for your employment or other engagement to work for the School, the School may also collect special categories of data, and information about criminal convictions and offences, including:

- information revealing your racial or ethnic origin;
- trade union membership, where applicable;
- information concerning your health and medical conditions (for example, where required to monitor and record sickness absences, dietary needs, or to make reasonable adjustments to your working conditions or environment);
- information concerning your sexual life or orientation (for example, in the course of investigating complaints made by you or others, for example concerning discrimination); and
- 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 our legal and regulatory obligations).

5.3. However, this will only be undertaken where and to the extent it is necessary for a lawful purpose in connection with your employment or other engagement to work for the School.

6. The bases for processing your personal data, how that data is used and whom it is shared with

6.1. ***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 the School. In this respect, depending on your role and status, the School is likely to use your personal data for the following purposes:

- administering job applications and, where relevant, offering you a role with the School;
- carrying out due diligence checks on you, whether during the application process for a role or during your engagement with the School, 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 the School in any capacity, for the performance of the contract of employment (or other agreement) between you and the School;
- to pay you and to administer benefits (including pensions) in connection with your employment or other engagement with the School;
- monitoring your attendance and your performance in your work, including in performance appraisals;
- promoting the School to prospective parents and others, including by publishing the work product(s) you create while employed by or otherwise engaged to work for the School;
- for disciplinary purposes, including conducting 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; and
- for any other reason or purpose set out in your employment or other contract with the School.

6.2. ***Legitimate interests***

We process your personal data because it is necessary for the School's (or sometimes a third party's) legitimate interests. The School's "legitimate interests" include its 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 your role and status, the School is likely to use your personal data for the following:

- providing you with information about the School and what it is like to work for here (where you have asked for this, most obviously before you have made a formal application to work for the School);
- for security purposes, including by operating security cameras in various locations on the School's premises;
- 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 cooperate 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;
- making travel arrangements on your behalf, where required;
- contacting you or your family members and 'next of kin' for business continuity purposes, to confirm your absence from work, etc.;
- publishing 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 in accordance with the School's ICT Acceptable Use Policy and government guidance such as KCSIE (Keeping Children Safe in Education).

6.3. ***Legal obligations***

The School also processes your personal data for its compliance with its legal obligations, notably those in connection with employment, charity law, tax law and accounting, and child welfare. In this respect, depending on your role and status, the School is likely to use your personal data for the following:

- to meet its 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);
- for tax and accounting purposes, including transferring personal data to HM Revenue and Customs to ensure that you have paid appropriate amounts of tax, and in respect of any Gift Aid claims, where relevant;
- 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.

6.4. ***Special categories of data***

Depending on your 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.

In particular, the School processes the following types of special category personal data for the following reasons:

- your physical or mental health or condition(s) in order to record sick leave and take decisions about your fitness for work, or (in emergencies) act on any medical needs you may have. 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;
- recording your racial or ethnic origin in order to monitor our compliance with equal opportunities legislation;
- trade union membership, in connection with your rights as an employee, agent or contractor and our obligations as an employer or engager of your services;
- categories of your personal data which are relevant to investigating complaints made by you or others, for example concerning discrimination, bullying or harassment, or as part of a complaint made against the School;
- data about any criminal convictions or offences committed by you, for example when conducting criminal background checks with the DBS, or via a self-declaration, or where a matter of public record exists (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 you);

The School will process special categories of personal data for lawful reasons only, including because:

- you have given the School your explicit consent to do so, but only in circumstances where seeking consent is appropriate;
- it is necessary to protect your or another person's vital interests, for example, where you have a life-threatening accident or illness in the workplace and your personal data must be processed in order to ensure you receive appropriate medical attention;
- it is necessary for the purposes of carrying out legal obligations and exercising legal rights (both yours and the School's) in connection with your employment or engagement by the School;
- it is necessary in connection with some function in the substantial public interest, including:
  - the safeguarding of children or vulnerable people; or
  - to prevent or detect unlawful acts; or
  - 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
  - to cooperate with a relevant authority, professional or regulatory body, such as the Independent School Inspectorate (ISI), Department for Education (DfE), Local Authority Designated Officer (LADO) or Teaching Regulation Agency (TRA), in such matters;
- to comply with public health requirements (e.g. in respect of Covid-19 (or in similar circumstances); or
- 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 you.

6.5. ***Low-level concerns about adults***

The School will process personal data about you, whether or not it constitutes special category data, in accordance with its policy on recording and sharing low-level concerns about adults (see the School's Safeguarding and Child Protection Policy on the policies page of the website here). 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 School's Data Retention Policy, and you have the same rights in respect of that information, as any other personal data that the School holds on you. However, any requests to access, erase or amend personal data held in accordance with this policy may be subject to necessary exemptions, for example if the School considers that compliance with the request might unreasonably impact the privacy rights of others or give rise to a risk of harm to children.

As a general rule, records of low-level concerns will be kept at least until the termination of your 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 that would normally be included in references, for example, misconduct or poor performance. A low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference.

7. Sharing your information with others

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 your 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:

- other employees, agents and contractors (e.g. third parties processing data on our behalf as part of administering payroll services, the provision of benefits including pensions, IT etc. – although this is not sharing your data in a legal sense, as these are considered data processors on our behalf);
- DBS and other government authorities (e.g. HM Revenue and Customs (HMRC), DfE, Children and Family Court Advisory and Support Service (CAFCASS), the 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, and the Charity Commission etc.;
- external auditors or inspectors;
- the School's advisers where it is necessary 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 the School is reconstituting or setting up some form of joint working or partnership arrangement in the unlikely event that those third parties are acquiring or considering acquiring all or part of the School;
- 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 the police.

7.2. The School may also share information about you with other employers in the form of a reference, where considered appropriate, or if required to do so in compliance with legal obligations. References given or received in confidence may not be accessible under your UK GDPR rights.

8. How long your information is kept

8.1. Personal data relating to unsuccessful job applicants is deleted after six months from the end of the application process, except where the School has notified you it intends to keep it for longer (and you have not objected).

8.2. For staff, subject to any other notices that the School may provide to you, your personal data may be retained for a period of seven years after your contract has expired or been terminated.

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. Please see the School's Data Retention Policy.

9. Your rights

9.1. Please see the School Privacy Notice which has details of your rights as a 'data subject', which are the same as if you were any member of the public.

9.2. You can find out more about your rights under applicable data protection legislation from the Information Commissioner's Office website available at www.ico.org.uk.

10. This notice

10.1. The School will update this Staff 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.

11. Contact and complaints

11.1. If you have any queries about this Privacy Notice or how the School processes your personal data, or if you wish to exercise any of your rights under applicable law, you may contact your line manager or refer the matter through the Staff Grievance Procedure if you are an employee of the School. Otherwise, you should contact the Chief Financial and Operations Officer on dataprotection@haileybury.com.

11.2. If you are not satisfied with how the School is processing your personal data, or how it deals with your complaint, you can make a complaint to the Information Commissioner: www.ico.org.uk. The ICO does recommend you seek to resolve any issues with the data controller initially prior to any referral.

Version history		
Date	**Reviewed by**	**Notes**
July 2023	Chief Operating Officer	New policy - based on ISBA template
September 2025	Executive Leadership Team (ELT)	Updated to reflect CFOO role
November 2025	Operational Leadership Team (OLT)	Reviewed
January 2026	ELT	Reviewed and approved