



Staff, Volunteer and Visitor Privacy Notice (How we use staff, volunteer and visitor information)

Purpose and status

Approved by: Governing Body / Board of Trustees of Claygate Primary School

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Document owner: Satswana Ltd (outsourced Data Protection Officer) — dpo@satswana.com

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Claygate Primary School, Foley Road Claygate Surrey KT10 0NB, is the data controller for your information as a member of the school workforce. Our ICO registration number is Z5070711 and our Data Protection Officer is Satswana Ltd (outsourced Data Protection Officer) (dpo@satswana.com).

This notice covers employees, casual and supply staff, agency workers, apprentices, trainees on placement, volunteers including governors and self-employed contractors working at the school.

What we hold

- Identity and contact details — name, address, telephone numbers, personal email, date of birth, National Insurance number, photograph and emergency contacts (including next of kin details you provide).
- Recruitment records — application form, CV, interview notes, references, qualifications, proof of identity and right to work, and pre-employment checks.
- Vetting — DBS certificate number, date and disclosure outcome, barred list checks, prohibition checks, overseas checks, section 128 checks and the single central record entries.
- Employment records — contract, job description, salary, pay scale, working pattern, start and end dates, changes of role and continuous service date.
- Payroll and pension — bank details, tax code, National Insurance, pension scheme membership and contributions, student loan deductions, expenses and salary sacrifice arrangements.
- Absence and health — sickness absence records, fit notes, occupational health reports, disability and reasonable adjustments, accident records, and maternity, paternity, adoption, shared parental and carer's leave records.
- Performance and development — appraisal records, objectives, professional development and training records, and qualifications gained.
- Conduct — records relating to grievances, disciplinary matters, capability, allegations and investigations, including safeguarding allegations.
- Equality monitoring — ethnicity, gender, disability, religion or belief and sexual orientation, where you choose to provide it, used in anonymised form only.
- Trade union membership, where you tell us or where subscriptions are deducted from pay.
- System and site records — email and network accounts, access logs, CCTV images, building access records and telephone records.

Why we use it and our lawful basis

We use your information to recruit and employ you; to pay you and administer pension and benefits; to manage attendance, absence and health at work; to support your development and manage performance; to meet safeguarding and safer recruitment duties; to manage conduct and capability; to plan the workforce and meet statutory returns; to secure our site and systems; and to defend legal claims.

Our lawful bases are:

- Contract — to perform your contract of employment, including pay and benefits.
- Legal obligation — including the Education (School Teachers' Appraisal) Regulations, safer recruitment duties under Keeping Children Safe in Education, tax and National Insurance, health and safety, right to work checks, pension auto-enrolment and the school workforce census.
- Public task — the safe and effective running of the school.
- Legitimate interests — for example maintaining internal contact lists, protecting our systems and property, and managing operational communications. Where we rely on legitimate interests we have balanced them against your rights.
- Consent — for optional matters such as your photograph on the school website or inclusion in publicity. You can withdraw consent at any time.

For health and other special category data we also rely on Article 9(2)(b) (employment and social protection law), 9(2)(h) (occupational health), 9(2)(c) (vital interests) and 9(2)(g) with the safeguarding conditions in Schedule 1 DPA 2018. DBS and criminal offence information is processed under the safer recruitment and safeguarding conditions in Schedule 1 DPA 2018.

Who we share it with

We share workforce information, only where necessary, with: the Department for Education (school workforce census); Surrey County Council; the Teachers' Pension Scheme, the Local Government Pension Scheme and other pension providers; HMRC; our payroll and HR system providers; occupational health providers; the Disclosure and Barring Service; the Teaching Regulation Agency and other regulators where a referral is required; the Local Authority Designated Officer, children's social care and the police in relation to safeguarding allegations; recruitment referees and, on request, prospective employers; our auditors, insurers and legal advisers; trade unions where you have authorised it; and Ofsted and, where applicable, our trust or diocese.

We do not sell your information or use it for marketing.

How long we keep it

In line with our Retention Schedule:

- personnel file — six years after employment ends, except where a longer period applies;
- records of safeguarding allegations that are substantiated — until normal retirement age or ten years, whichever is longer; malicious or unfounded allegations are removed from the file;
- the single central record — retained while employed, and evidence of checks for six years afterwards;
- payroll and pension records — six years, and pension entitlement records for the life of the scheme member;
- recruitment records for unsuccessful applicants — six months;
- DBS certificate content — not retained; the certificate itself is destroyed within six months of the recruitment decision, with only the number, date and outcome recorded;
- accident records — three years, or until the individual's 21st birthday where a young person is involved;
- CCTV footage — 30 days.

Monitoring in the workplace

We monitor the use of school IT systems, email, internet access and access to pupil records to safeguard children, protect our systems and meet our legal duties. Monitoring is proportionate, is covered by a Data Protection Impact Assessment, and is not used for covert surveillance except in the exceptional circumstances set out in our CCTV Policy. We do not read personal email content routinely; where an account must be accessed, this is authorised by the Headteacher and recorded.

Your rights over your information

You have the right to: be informed about how we use your data; request a copy of it (a subject access request); have inaccurate data corrected; ask for data to be erased where we have no continuing reason to hold it; ask us to restrict processing while a concern is resolved; object to processing based on our legitimate interests or public task; receive certain data in a portable format; and withdraw consent at any time where we have relied on consent.

To exercise any right, contact our Data Protection Officer, Satswana Ltd (outsourced Data Protection Officer), at dpo@satswana.com, or write to the Headteacher at Foley Road Claygate Surrey KT10 0NB. We respond within one calendar month, and will tell you if we need to extend that for a complex request.

Some rights are qualified. For example, we cannot delete records we are required by law to keep, and we may withhold information where an exemption applies (such as where disclosure would cause serious harm, or would identify a third party or a safeguarding referrer).

If you are unhappy with how we have handled your information, please tell us first so we can put it right. You also have the right to complain to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF, ico.org.uk/make-a-complaint, 0303 123 1113.

Storing your data outside the UK

Your data is normally stored within the United Kingdom or the European Economic Area. Some of our software suppliers host or support data outside the UK. Where that happens we only transfer data where the country is covered by UK adequacy regulations, or where we have put in place the International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses, supported by a documented Transfer Risk Assessment. You can ask dpo@satswana.com for details of the safeguards in place.