



PORTSDOWN
Primary School & Early Years

PRIVACY NOTICE : STAFF PRIVACY NOTICE

Portsmouth Primary School and Early Years

Sundridge Close, Cosham, Portsmouth, Hampshire PO6 3JL

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Email: admin@portsdown.portsmouth.sch.uk

Headteacher: Mr A Vaghela

PRIVACY NOTICE

(How we use workforce information)

You have a legal right to be informed about how our school uses any personal information that we hold about you. This privacy notice explains how we collect, store, and use personal data about members of our workforce.

We, Portsmouth Primary School and Early Years, are the 'data controller' for the purposes of data protection law.

Categories of workforce information we collect, hold, and share

We collect and process the following categories of personal information:

- **Personal identifiers** (name, employee or teacher number, national insurance number, date of birth)
- **Contact information** (address, telephone numbers, email addresses, emergency contact details)
- **Characteristics information** (gender, age, ethnic group, nationality)
- **Contract information** (start date, end date, hours worked, post, roles, salary information, pension details)
- **Work absence information** (number of absences, reasons for absence, sickness records)
- **Qualifications and training** (and, where relevant, subjects taught, CPD records, performance management records)
- **Medical information** (disabilities, special needs, occupational health information)
- **Right to work information** (immigration status, proof of identity, DBS certificates and check information)
- **Bank details** (for payroll purposes)
- **Photographs** (for ID badges, website, promotional materials - with consent where appropriate, and CCTV images)
- **Professional conduct information** (disciplinary records, allegations, references)

This list is not exhaustive.

Why we collect and use workforce information

We collect and use workforce data to:

- Enable the development of a comprehensive picture of the workforce and how it is deployed
- Inform the development of recruitment and retention policies
- Administer the payroll and enable individuals to be paid
- Maintain sickness records and manage absences
- Monitor equal opportunities

- Make provision for disabilities or special needs
- Facilitate safe recruitment and safeguarding checks
- Support effective performance management
- Comply with statutory workforce reporting requirements (e.g., School Workforce Census)
- Manage professional development and training
- Administer pension schemes
- Ensure health and safety compliance
- Manage disciplinary and grievance procedures where necessary

Lawful basis for processing

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing personal information are:

For general employment purposes:

- **Article 6(1)(b)** - processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
- **Article 6(1)(c)** - processing is necessary for compliance with a legal obligation to which the controller is subject

For statutory data collections and workforce reporting:

- **Article 6(1)(c)** - processing is necessary for compliance with a legal obligation to which the controller is subject

For special category data (such as medical information, ethnicity, disabilities):

- **Article 9(2)(a)** - the data subject has given explicit consent to the processing of those personal data for one or more specified purposes
- **Article 9(2)(b)** - processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law
- **Article 9(2)(h)** - processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee

For safeguarding purposes: Under the Data (Use and Access) Act 2025, safeguarding children is a recognised legitimate interest, which provides a lawful basis for processing personal data where necessary to protect children from harm.

Collecting workforce information

We collect personal information via:

- Application forms
- Interview records and recruitment documentation
- Employment contracts and offer letters
- Emergency contact forms
- Payroll and pension forms
- Absence request forms and sickness certificates
- Right to work in the UK documentation
- DBS certificate number
- Performance management and appraisal documentation
- Training and CPD records
- Occupational health assessments
- Disciplinary and grievance documentation (where applicable)
- References from previous employers
- Timesheets and expense claims

Workforce data is essential for the school's operational use. Whilst the majority of personal information you provide to us is mandatory (required for us to fulfil our employment and legal

obligations), some of it is requested on a voluntary basis. In order to comply with UK GDPR, we will inform you at the point of collection whether you are required to provide certain information to us or if you have a choice in this.

Storing workforce information

We hold data securely in electronic and paper formats in line with UK GDPR and our data retention schedule.

Data is retained according to the Portsmouth City Council Quick Guide to Retention Schedule and our Additional Retention Schedule, including:

- **Staff personal files:** 7 years after termination of employment
- **Payroll and salary records:** 6 years after last date of employment
- **Pension records:** 6 years after last payment
- **Sickness and absence records:** 6 years after termination
- **Performance management records:** 5 years after date
- **DBS certificates:** Maximum 6 months (record of checks completed retained permanently)
- **Accident/injury at work records:** 12 years after date
- **Disciplinary records** (non-child protection): Varying periods depending on warning level (6 months to 18 months)
- **Allegations of child protection nature against staff:** Retirement or date + 10 years Section L - Document Retention Schedule

For full details, please refer to our data retention schedule available from the school office.

Who we share workforce information with

We routinely share workforce information with:

- **Portsmouth City Council** (our local authority) - for payroll, pensions, workforce planning, and statutory reporting
- **The Department for Education (DfE)** - for statutory workforce census and policy development
- **Our payroll provider** - to administer salaries and pensions
- **Pension providers** (Teachers' Pension Scheme, Local Government Pension Scheme)
- **HM Revenue & Customs (HMRC)** - for tax and national insurance purposes
- **Occupational health providers** - where necessary for health and safety
- **Professional bodies** (e.g., Teaching Regulation Agency) - where required
- **Disclosure and Barring Service (DBS)** - for safeguarding checks
- **Ofsted** - during inspections
- **Trade unions** - with your consent
- **Legal and professional advisors** - where necessary
- **Police, courts, and tribunals** - where lawfully required
- **Recruitment agencies and prospective employers** - with your consent (for references)

We do not share information about our workforce members with anyone without consent unless the law and our policies allow us to do so.

Why we share workforce information

Local Authority

When we share information about our workforce members with Portsmouth City Council, this is so that they can:

- Provide payroll and pension administration services on our behalf
- Collect and report on school workforce information for statutory purposes
- Support workforce planning and development

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 amendments.

The school will also share workforce information for statutory reporting and inspection purposes with the Department for Education (DfE) and with Ofsted.

The local authority is under a duty to protect the public funds it administers, and to this end may use the information they hold about you for the prevention and detection of fraud. It may also share this information with other bodies responsible for auditing or administering public funds for these purposes. For further information go to www.portsmouth.gov.uk and search for 'National Fraud Initiative'.

Department for Education (DfE)

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections.

We are required to share information about our workforce with the Department for Education (DfE) for the purpose of the School Workforce Census, which is a statutory return under sections 113 and 114 of the Education Act 2005.

We are required to share information about our school employees with the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

All data is transferred securely and held by DfE under a combination of software and hardware controls which meet the current government security policy framework.

For more information, please see the 'How Government uses your data' section below.

Your rights

Under data protection legislation, you have the right to:

- **Access** - to ask us for access to information about you that we hold
- **Rectification** - to have your personal data rectified if it is inaccurate or incomplete
- **Erasure** - to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- **Restrict processing** - to restrict our processing of your personal data (i.e., permitting its storage but no further processing)
- **Object** - to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- **Data portability** - to receive the personal data you provided to us in a structured, commonly used and machine-readable format (in certain circumstances)
- **Not to be subject to automated decisions** - not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance by contacting the Headteacher, Mr A Vaghela.

Alternatively, you can contact the Information Commissioner's Office at

<https://ico.org.uk/concerns/>.

Requesting access to your personal data

To make a request for your personal information (a Subject Access Request), contact:

The Headteacher, Mr A Vaghela

Portsdown Primary School and Early Years

Sundridge Close, Cosham, Portsmouth, Hampshire PO6 3JL

Email: admin@portsdown.portsmouth.sch.uk

Withdrawal of consent

Where we are processing your personal data with your consent, you have the right to withdraw that consent at any time. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the Headteacher, Mr A Vaghela. Please note that withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

Photographs and CCTV

The school uses CCTV within school premises for safety, security, and safeguarding purposes. CCTV footage is retained for a maximum of 31 days unless required for an ongoing investigation, legal proceedings, or safeguarding purposes. Portsdown_CCTV_Policy_Updated_2025

We may take photographs of staff for:

- ID badges and security purposes
- The school website and promotional materials (with consent)
- Internal records and displays

You have the right to withdraw consent for the use of your photograph for promotional purposes at any time.

Contact

If you would like to discuss anything in this privacy notice, please contact:

The Headteacher, Mr A Vaghela

Portsdown Primary School and Early Years

Sundridge Close, Cosham, Portsmouth, Hampshire PO6 3JL

Email: admin@portsdown.portsmouth.sch.uk

If you need more information about how our local authority and/or DfE collect and use your information, please see the Portsmouth City Council Data Protection Privacy Notice.

How Government uses your data

The workforce data that we lawfully share with the Department for Education (DfE) through data collections:

- Informs the Department for Education (DfE) policy on pay and the monitoring of the effectiveness and diversity of the school workforce
- Links to school funding and expenditure
- Supports 'longer term' research and monitoring of educational policy

Data collection requirements

To find out more about the data collection requirements placed on us by the Department for Education, including the data that we share with them, go to:

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>

Sharing by the Department for Education (DfE)

The Department for Education (DfE) may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- Conducting research or analysis
- Producing statistics
- Providing information, advice or guidance

The Department for Education (DfE) has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether the Department for Education (DfE) releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- Who is requesting the data
- The purpose for which it is required
- The level and sensitivity of data requested

- The arrangements in place to securely store and handle the data

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

How to find out what personal information the Department for Education (DfE) hold about you

Under the terms of the Data Protection Act 2018, you're entitled to ask the Department for Education (DfE):

- If they are processing your personal data
- For a description of the data they hold about you
- The reasons they're holding it and any recipient it may be disclosed to
- For a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

To contact the Department for Education (DfE):

<https://www.gov.uk/contact-dfe>

Last updated: October 2026 (updated to reflect UK GDPR, Data Protection Act 2018, and the Data (Use and Access) Act 2025)

Please revisit this notice periodically for updates.