PRIVACY NOTICE:
STAFF PRIVACY NOTICE

Portsdown Primary School and Early Years
Sundridge Close, Cosham, Portsmouth, Hampshire PO6 3JL
Tel: 023 9237 8991
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, Portsdown Primary School and Early Years, are the 'data controller' for the purposes of data protection law.

The categories of school information that we process
These include:

- personal information (such as name, employee or teacher number, national insurance number)
- characteristics information (such as, sex, age, ethnic group)
- contract information (such as start date, hours worked, post, roles and salary information)
- work absence information (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught)

We also process the following additional categories of workforce information:

- **Personal identifiers** (date of birth)
- **Contact information** (address, telephone numbers, email addresses, emergency contact details)
- **Characteristics information** (nationality)
- **Contract information** (end date, pension details)
- **Qualifications and training** (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. To access the current list of categories of information we process, please contact the school office or visit our website at www.portsdown.portsmouth.sch.uk

Why we collect and use workforce information

We use workforce data to:

1. enable the development of a comprehensive picture of the workforce and how it is deployed
2. inform the development of recruitment and retention policies
3. enable individuals to be paid

We also collect and use workforce information to:

- 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 legal basis / bases we rely on for processing personal information for general purposes are:

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."

For the purposes of statutory data collections and workforce reporting, the legal basis is:

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

The legal basis for using workforce information for workforce planning purposes is;

Article 6(1)(e) "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller".

In addition, concerning any special category data:

- the conditions under UK GDPR - Article 9 (https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/) are:
- Article 9(2)(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes
- OR
- 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
- OR
- 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, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services.

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.

Relevant legislation supporting our lawful bases includes:

- Education Act 2005 (sections 113 and 114)
- Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments
- Employment Rights Act 1996

- Equality Act 2010
- Health and Safety at Work etc. Act 1974
- Safeguarding Vulnerable Groups Act 2006

Collecting workforce information
We collect personal information via:
- Application forms
- Interview records and recruitment documentation
- Employment contracts and offer letters
- Staff contract forms
- 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 / local authority's operational use. Whilst the majority of personal information you provide to us is mandatory, 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.

Examples of voluntary data collection include:
- Trade union membership
- Consent for promotional photographs on the school website or in marketing materials
- Participation in staff surveys
- Optional equality monitoring information beyond statutory requirements

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Storing workforce information
We hold data securely for the set amount of time shown in our data retention schedule. We hold data securely in electronic and paper formats in line with UK GDPR. 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
- **CCTV footage**: Maximum 31 days unless required for an ongoing investigation, legal proceedings, or safeguarding purposes

For more information on our data retention schedule and how we keep your data safe, please visit www.portsdown.portsmouth.sch.uk or contact the school office. Our full Data Protection Policy and retention schedules are available on request.

Who we share workforce information with
We routinely share this information with:

- our local authority (where applicable)
- the Department for Education (DfE)

We also share workforce information with:

- **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)

Why we share school workforce information
We do not share information about our workforce members with anyone without consent unless the law and our policies allow us to do so.
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 members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.
The local authority 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'.
All data is transferred securely to Portsmouth City Council and held under a combination of software and hardware controls which meet the current government security policy framework.
Other third parties
We share data with other third parties listed above for the following lawful reasons:

- **Payroll and pension providers**: To fulfil our contractual obligations to pay staff and administer pensions (Article 6(1)(b) and 6(1)(c))
- **HMRC**: To comply with tax and national insurance legal obligations (Article 6(1)(c))
- **Occupational health providers**: To fulfil our health and safety legal obligations and support staff wellbeing (Article 6(1)(c) and Article 9(2)(h))
- **DBS**: To comply with safeguarding legal obligations (Article 6(1)(c))
- **Ofsted**: To comply with inspection legal obligations (Article 6(1)(c))
- **Professional bodies**: To comply with professional registration requirements (Article 6(1)(c))

- **Trade unions**: With your explicit consent (Article 6(1)(a))
- **Legal advisors, police, courts**: To comply with legal obligations or protect vital interests (Article 6(1)(c) or 6(1)(d))
- **References**: With your consent or as part of our contractual obligations (Article 6(1)(a) or 6(1)(b))

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.
For more information, please see 'How Government uses your data' section.
For privacy information on the data the Department for Education (DfE) collects and uses, please see: https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers.
All data is transferred securely to the DfE and held by DfE under a combination of software and hardware controls which meet the current government security policy framework.

Requesting access to your personal data
The UK GDPR gives you certain rights about how your information is collected and used. To make a request for your personal information, 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
You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request, data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commissioner (https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights) if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.

- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at raise a concern with ICO (https://ico.org.uk/concerns/)

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. For more information, please see our CCTV Policy.

We may take photographs of staff for:

- ID badges and security purposes (this is necessary for the performance of your contract and security - consent is not required)
- The school website and promotional materials (we will seek your explicit consent for this use)
- Internal records and displays (we will seek your consent where appropriate)

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

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

Last updated

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time.

This version was last updated by Portsdown Primary School on 11/11/2026

This version was last updated by the LA on the 05/11/2026.

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 to raise a raise a concern or data protection complaint with Portsmouth City Council in the first instance, then please reach out to the council's Information Governance Team at: dataprotection@portsmouthcc.gov.uk

For more information about how Portsmouth City Council and/or DfE collect and use your information, please see the Portsmouth City Council Data Protection Privacy Notice at www.portsmouth.gov.uk

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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

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Data collection requirements
To find out more about the data collection requirements placed on us by the Department for Education (DfE) 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) will only share your personal data where it is lawful, secure and ethical to do so and 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 public benefit, proportionality, legal underpinning and strict information security standards.
For more information about the Department for Education's (DfE) data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-data
For information about which organisations the Department for Education (DfE) has provided information, (and for which project) please visit the following website: https://www.gov.uk/government/publications/dfe-external-data-shares

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How to find out what personal information the Department for Education (DfE) hold about you
Under the terms of UK GDPR, 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'. See the guide for details: https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights
Further information on what personal information the Department for Education (DfE) holds about you is published in the privacy notice for education providers' workforce, including teachers. This is available below: https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers
To contact the Department for Education (DfE): https://www.gov.uk/contact-dfe

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