



The Complete Works Policies

Staff Privacy Notice

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Reviewed by: Amy Jones -Director of Operations - September 2025
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1. Aims

This privacy notice explains how The Complete Works (TCW) collects, uses, and protects personal information about you during and after your work relationship with us, in accordance with UK GDPR and the Data Protection Act 2018.

It applies to all current and former staff, workers, contractors, and volunteers.

TCW is the data controller, responsible for deciding how personal data is held and used.

2. Who Collects this Information

The Complete Works is a “data controller.” This means that we are responsible for deciding how we hold and use personal information about you.

We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of any contract of employment or other contract to provide services and we may update this notice at any time.

It is important that you read this notice with any other policies mentioned within this privacy notice, so that you understand how we are processing your information and the procedures we take to protect your personal data.

3. Data Protection Principles

We comply with the following principles when processing personal information:

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

4. Categories of Information We Collect, Process, Hold and Share

We may collect, store, and use the following categories of personal information about you:

Personal and contact details	Title, Name, Address, DOB, phone Number and Email Address
Emergency Contacts	Relationship, Name, Phone Number and Email Address
Recruitment Information	Application forms, CVs, references, right to work documents
Employment contract details	Start/end dates, hours, post, role
Education & training	Qualifications, CPD records

Salary & benefits	Payroll records, tax, NI, pensions, benefits
Dependants	Name, Age, relationships
Sensitive data (special category)	Health, disability, racial/ethnic origin, religion, sexual orientation, trade union membership
Criminal convictions	Required for roles working with children
Performance & conduct	Appraisals, capability, disciplinary, grievances
Attendance	Timekeeping, absence records
IT & communications usage	Emails, internet usage, video conferencing recordings
CCTV & site security	Video recordings of staff
Public/social media	Limited, risk-assessed review if necessary
Salary	Payment details, payroll records, tax status information, national insurance number, pension and benefits information
Nationality	Nationality and immigration status and information from related documents, such as your passport or other identification and immigration information
Health	Information in your sickness and absence records such as number of absences and reasons (including sensitive personal information regarding your physical and/or mental health)
Grievances and Disciplinary/Capability	Information on grievances raised by or involving you and information on conduct and/or other disciplinary issues involving you.

5. How We Collect this Information

Data may be collected:

- Directly from you (application, forms, emails)
- From third parties (e.g., references, HR or pension providers, occupational health, Home Office)
- Automatically via school systems (CCTV, IT, access control)

6. Lawful Basis for Processing

We process personal data under the following lawful bases:

- Contractual necessity: To fulfil your employment contract

- Legal obligations: To comply with employment, health & safety, and safeguarding laws
- Public interest: Where required to protect the wellbeing of staff or students
- Legitimate interests: Monitoring IT usage, CCTV, or security (after a Legitimate Interest Assessment)
- Consent: Where explicitly provided for special processing activities

8. How we use your Personal Data

We use personal data to:

- Recruit, employ, and manage staff
- Administer payroll, benefits, and pensions
- Conduct performance management and training
- Maintain health, safety, and safeguarding
- Comply with legal and regulatory obligations
- Protect our systems and networks (IT monitoring, CCTV, access control)
- Administer internal policies and procedures
- Provide data to third-party service providers, regulators, and statutory authorities as required

7. How We Use Particularly Sensitive Information

Sensitive personal information (as defined under the UK GDPR as “special category data”) requires higher levels of protection and further justification for collecting, storing and using this type of personal information. We may process this data in the following circumstances:

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations in line with our data protection policy;
- Where it is needed in the public interest, such as for equal opportunities monitoring (or in relation to our pension scheme);
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards. Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is necessary to protect your interests (or someone else’s interests) and you are not capable of giving your consent.

We will use this information in the following ways:

- Collecting information relating to leave of absence, which may include sickness absence or family related leave;
- To comply with employment and other laws;
- Collecting information about your physical or mental health, or disability status, to ensure your health and welfare in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to manage sickness absence and to administer benefits;
- Collecting information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

8. Criminal Convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where it is necessary to carry out our legal obligations. We will only collect

information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

9. Sharing Data

Where appropriate we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of working for us.

We may need to share your data with third parties, including third party service providers where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. These include the following:

- the Department for Education (DfE);
- Ofsted;
- Prospective Employers;
- Welfare services (such as social services);
- Law enforcement officials such as police, HMRC;
- LADO;
- Training providers;
- Professional advisors such as lawyers and consultants;
- Support services (including HR support, insurance, IT support, information security, pensions and payroll);
- The Local Authority;
- Occupational Health;
- DBS;
- Recruitment and supply agencies.

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the UK and the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

10. Retention Periods

Except as otherwise permitted or required by applicable law or regulation, the School only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

Once you are no longer a staff member at the school we will retain and securely destroy your personal information in accordance with our Data Retention Policy which can be found on Ariel under My Policies.

Recruitment records (unsuccessful applicants)	6 months
Recruitment records (successful applicants)	Duration of employment + 6 years
Payroll & tax records	Duration of employment + 6 years
Pension records	Duration of employment + 12 years

Health & occupational record	Duration of employment + 6 years
Safeguarding records	Indefinitely
CCTV Footage	10 days unless required for an investigation
Training Records	Duration of employment + 6 years

Data will be **securely deleted or anonymised** when the retention period ends.

11. Security

We implement **technical and organisational measures** to protect personal data, including:

- Password-protected systems
- Role-based access controls
- Encrypted storage and transmission
- Regular staff training on data protection
- Secure disposal of paper and electronic records

You can find further details of our security procedures within our Data Breach policy and our Information Security policy, which can be found on Ariel.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

12. Your Rights of Access, Correction, Erasure and Restriction

Under certain circumstances, by law you have the right to:

- Access your personal data (Subject Access Request)
- Correct inaccurate data
- Request deletion where lawful
- Restrict processing
- Object to processing (e.g., legitimate interest processing)
- Data portability

Requests should be submitted in writing to the Data Protection Lead (DPL), sahana.venkatesh@tcw.org.uk. Response will normally be within 1 month (extendable to 3 months if complex).

13. Right to Withdraw Consent

Where processing is based on consent, you may withdraw at any time by contacting Sahana Venkatesh. Withdrawal does not affect processing under other lawful bases.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by Sahana Venkatesh, then you can contact the DPO on the details below:

Data Protection Officer:

Judicium Consulting Limited
72 Cannon Street, London, EC4N 6AE
dataservices@judicium.com
www.judiciumeducation.co.uk
Lead Contact: Craig Stilwell

Complaints may also be made to the Information Commissioner's Office (ICO).

14. Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

15. Monitoring and Review

This policy is monitored on an ongoing basis to evaluate its effectiveness and ensure appropriate steps can be taken to eliminate unlawful discrimination.

If you have any suggestions or comments regarding this policy, please email suggestions@tcw.org.uk.

Review log

Policy	Privacy Notice for Staff
Date of Approval	September 2023
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