DULWICH COLLEGE
FOUNDED 1619

DATA PROTECTION - PRIVACY NOTICE FOR STAFF

1. Who this document applies to

This document applies to:

- Employees (teaching and operational);
- Peripatetic teachers (including visiting music and drama teachers) and other self-employed staff (including self-employed sports coaches);
- Self-employed contractors and contractors working for the College via service companies owned by them;
- Casual workers;
- Temporary staff;
- Agency staff and employees working for contractors and service suppliers (e.g. coach drivers) in respect of whom the College carries out certain checks (including DBS and identity checks);
- Volunteers who may be employed or engaged by the College to work for it in any capacity; and
- As applicable, family members of staff (or individuals who live with staff members in staff accommodation)

There are separate Privacy Notices for:

- Job Applicants;
- Governors and other Non-Executive Officers; and
- Parents, Pupils and Old Alleynians.

2. What this document does

This Privacy Notice explains how Dulwich College (a company registered in England and Wales under company registration number 08208764 and charity registration number 1150064) collects, uses and shares (or "processes") your personal information (or data) and your rights in relation to the personal data we hold.

This Privacy Notice also applies in addition to the College's other relevant terms and conditions and policies, including:

- any contract between the College and its staff;

- the College's policies and procedures in relation to CCTV, safeguarding, health and safety, whistleblowing and acceptable use of IT including as to how concerns, low-level concerns or incidents are reported or recorded (both by and about staff).

This Privacy Notice also applies alongside any other information the College may provide about particular uses of personal data, for example when collecting data via an online or paper form.

3. How we collect your information

We may collect your personal data in a number of ways, for example:

- from the information you provide to us in the process of making a job application, for example when you come for an interview;

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

- from third parties, for example:

  - the Disclosure and Barring Service (DBS);

  - referees (including your previous or current employers or school);

  - social media and third party websites (as part of online suitability checks for shortlisted candidates); and/or

  - if you are a contractor or supply teacher, your own employer or agent,

  in order to verify details about you and/or your application to work for us.

More generally, during the course of your work for us, as a member of staff, we 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 duties more generally, including by filling reports, note taking, or sending emails on College 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.

If you are living in staff accommodation because a member of your family or partner is employed by the College, we will need to obtain personal data about you from that person.

4. The types of information we collect

We may collect the following types of personal data:

- contact and communications information, including your contact details and the contact details of your next of kin/emergency contact;
- if you are going to live in staff accommodation, the details of any family member(s) who will be living with you (in which case you will ensure that they are aware of the contents of this Privacy Notice);
- records of communications and interactions we have had with you;
- biographical, educational and social information, including: (a) your name, title, gender, nationality and date of birth; (b) your image and likeness, including as captured in photographs taken for work purposes; (c) details regarding your education, academics, prior employment; (d) references, and safeguarding information; (d) 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); and (e) your interests and co-curricular activities;
- financial information, including: (a) your bank account number, name and sort code (used for paying your salary and processing other payments); (b) your tax status (including residence status); (c) Gift Aid declaration information, where relevant;
- information related to pensions, national insurance, or employee benefit schemes;
- work related information, including: (a) details of your work history and references from your previous employer(s); (b) nationality and other immigration status information (i.e. about your entitlement to work in the UK), including copies of passport information (if applicable); (c) your personal data captured in the work product(s), notes and correspondence you create while employed by or otherwise engaged to work for the College; (d) details of your professional activities and interests; (e) your involvement with and membership of sector bodies and professional associations; (f) information about your work and professional life after leaving the College, where relevant; and
- any other information relevant to your employment or other engagement to work for the College.

Where necessary, we may also collect special categories of data 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 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 or compliance with our legal and regulatory obligations).

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 College.

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

(a) 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 contract for services). In this respect, we use your personal data for the following:

- administering job applications and, where relevant, offering you a role with us;
- carrying out due diligence checks on you, whether during the application process for a role with us or during your engagement with us, including by checking references in relation to your education and your work history and obtaining any required self-declarations;
- once you are employed or engaged by us in any capacity, for the performance of our contract with you;
- to pay you and to administer benefits (including pensions) in connection with your work for the College;
- monitoring your attendance and your performance in your work, including in performance appraisals;
- promoting the College to prospective parents and others, including by publishing the work product(s) you create while employed by or otherwise engaged to work for the College;

- for complaints, grievance and 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 contract with us.

(b) Legitimate Interests

We process your personal data because it is necessary for our (or sometimes a third party's) legitimate interests. Our "legitimate interests" include our interests in running the College 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[1]). In this respect, we use your personal data for the following purposes:

- in relation to your recruitment, selection and appointment;

- providing you with information about us and what it is like to work for us (where you have asked for this, most obviously before you have made a formal application to work for us);

- for reasons of security and implementation of College policies (as appropriate), including by operating security cameras in various locations on the College's premises;

- to enable relevant authorities to monitor the College'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 pupils' welfare and provide appropriate pastoral care (including following the requirements and recommendations of the government's guidance on Keeping Children Safe in Education (KCSIE);

- to carry out or cooperate with any College or external complaints, disciplinary or investigatory process;

[1] The General Data Protection Regulation as retained and applied in the UK ("UK GDPR") and Data Protection Act 2018 and all other data protection law and regulations

- 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 continuity purposes, to confirm your absence from work, etc;
- publishing your image and likeness in connection with your work for us (including on the intranet and website, in marketing materials and communications and on your ID card);
- to manage staff accommodation; and
- to monitor (as appropriate) use of the College's IT and communications systems in accordance with the College's IT acceptable use policies and government guidance such as KCSIE.

(c) Legal Obligations

We also process your personal data for our compliance with our legal obligations, notably those in connection with employment, charity law, company law, tax law and accounting, and child welfare. In this respect, we use your personal data for the following purposes:

- to meet our legal obligations (for example, relating to child welfare, 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.

(d) Special categories of data

We process 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 for the reasons set out below. We will process this data on the basis that such processing is necessary to carry out obligations and exercise rights (both yours and ours) in relation to your employment or engagement by the College. In particular, we process 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;

- 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 and our obligations as an employer;

- 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 College; and

- 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 (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).

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

- you have given us your explicit consent to do so, in circumstances where consent is appropriate;

- it is necessary the purposes of carrying out legal obligations and exercising legal rights (both yours and ours) in connection with your employment or engagement by us;

- 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 we have to process your personal data in order to ensure you receive appropriate medical attention;

- it is necessary for some function in the substantial public interest, including the safeguarding of children or vulnerable people, or as part of a process designed to protect others from malpractice, incompetence or unfitness in a role (or to establish the truth of any such allegations) or to cooperate with a relevant authority/regulatory body (e.g., ISI, TRA etc.) in such matters;

- it is necessary to comply with public health requirements from time to time; and

- 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 us or you.

(v) Low-level concerns about adults

We will process personal data about you, whether or not it constitutes special category data, in accordance with our policy on recording and sharing low-level concerns as set out in the College's Safeguarding (Child

Protection) Policy. This will be processed for the same safeguarding and/or employment law reasons as set out above. Requests to access, erase or amend personal data we hold in accordance with the low levels concerns policy may be subject to necessary exemptions, for example if we consider that compliance with the request might unreasonably impact the privacy rights of others or give rise to a risk of harm to children.

6. Sharing your information with others

For the purposes referred to in this Privacy Notice and relying on the bases for processing as set out above, we may share your personal data (including in limited cases special category or criminal data) with certain third parties, for example:

- 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);
- Governors of Dulwich College and non-executive directors of the College's trading subsidiaries (Dulwich College Enterprises Ltd and Dulwich College Enterprises Overseas Ltd).
- DBS (Disclosure and Barring Service) and other relevant authorities and agencies such as the Department for Education, the Teaching Regulation Agency, the Information Commissioner's Office, the Charity Commission and Social Services;
- the College's auditors;
- inspectors;
- other schools and bodies with whom the College carries on activities (e.g. James Allen's Girls' School, Alleyn's School, City Heights E-ACT Academy, the Dulwich College International schools, the Southwark Schools Learning Partnership and the Southwark Community Education Council);
- travel companies, airlines and other third parties involved in outings and expeditions in which you are participating;
- our advisers where it is necessary for us to obtain their advice or assistance, including insurers, lawyers, accountants, or other external consultants; and
- when the College is legally required to do so (by a court order, government body, law enforcement agency or other authority of competent jurisdiction), for example HM Revenue and Customs or police.

We may also share information about you with other employers in the form of a reference, where we consider it appropriate, or if we are required to do so in compliance with our legal obligations.

7. Data accuracy and security

The College will endeavour to ensure that all personal data held in relation to you is as up to date and accurate as possible. Please notify the College of any significant changes to important information, such as contact details.

The College will take appropriate technical and organisational steps to ensure the security of personal data, including policies around use of technology and devices, and access to College systems.

8. International transfers

Some of the personal data we process about you may be transferred to, and stored at, a destination outside the United Kingdom and the European Economic Area (EEA)[2]. This may happen in a variety of circumstances, including when you are travelling on an overseas trip outside Europe or when personal data is processed by a supplier who is based outside the EEA or who uses data storage facilities outside the EEA. A number of the College's IT systems are provided by third parties who are based or use servers outside the EEA (eg providers of hosted databases, websites, school post system, school portal, cloud storage and management information systems).

While some countries have adequate protection for personal data under applicable laws, in other countries steps will be necessary to ensure appropriate safeguards apply to it. These include imposing contractual obligations of adequacy or requiring the recipient to subscribe or be certified with an international framework of protection.

9. How long your information is kept

The College will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason.

In the school sector, the usual legal recommendation is that staff files are kept for 7 years after leaving. However, some information may be retained for longer than this, for example incident reports and safeguarding files, in accordance with specific legal requirements or recommendations arising from IICSA's[3] final report.

[2] The EEA comprises the EU countries and also Iceland, Liechtenstein and Norway.

[3] The Independent Inquiry into Child Sex Abuse

10. Your rights

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the College, and in some cases ask for it to be erased or amended or have it transferred to others, or for the College to stop processing it (subject to certain exemptions and limitations).

The College will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is generally one month in the case of requests for access to information but more complex or multiple requests may take longer). The College will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the College may ask you to reconsider or require a proportionate fee (but only where Data Protection Law allows it).

You should be aware that the right of access is limited to your own personal data and certain data is exempt from the right of access. This will include information which identifies other individuals, or information which is subject to professional privilege (for example, legal advice given to or sought by the College or documents prepared in connection with a legal action).

You may have heard of the "right to be forgotten" (or right of "erasure"). This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. All such requests will be considered on their own merits and on a case by case basis. We may have good reason to refuse a request to amend, delete or stop processing your personal data (particularly whilst you are still working for the College).

11. Queries and complaints

If you have any queries about this Privacy Notice, please contact legal@dulwich.org.uk.

If you believe that the College has not complied with this Notice or acted otherwise than in accordance with Data Protection Law, you should notify the Clerk to Governors with details of your complaint. You can write to Clerk to Governors, Dulwich College, Dulwich Common, London SE21 7LD or email: legal@dulwich.org.uk. The College will acknowledge your complaint within 30 days of receipt. The College will investigate and inform you of the outcome of your complaint without undue delay and keep you informed of progress as necessary.

If your complaint is not resolved to your satisfaction, or you believe that the College has not handled it appropriately you have the right to take the complaint to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (Tel: 0303 123 1113 Website: www.ico.org.uk/concerns). Please note that the ICO recommends that steps are taken to resolve matters with the relevant organisation first, before involving the ICO.

Policy Owner:	Clerk to the Governors
Last Reviewed:	June 2026
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