



Vita et Pax
PREPARATORY SCHOOL

Vita et Pax Preparatory School
Established 1936

Staff Privacy Notice

Policy Originator	Head Teacher
Approved by	Governing Body
Date Approved	1 March 2026
Status	Statutory
Review Period	Annually (next: March 2027)
Data Controller	Vita et Pax Preparatory School
Data Protection Lead	Jevash Dey (Business Manager)

1. Introduction

In the course of your work for Vita et Pax Preparatory School, we will collect, use and hold ('process') personal data relating to you. This makes the school a data controller of your personal information. This Privacy Notice sets out how we use that information and what your rights are.

This notice is issued under:

- The Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- The Employment Practices Code (ICO).
- Keeping Children Safe in Education (KCSIE) 2025.

2. Who This Notice Applies To

This notice applies to all staff at the school, including: employees, contractors, visiting music teachers and other peripatetic workers, casual workers, temps, volunteers, governors and prospective applicants for roles. References to 'employment' or 'staff' do not confer employment rights on contractors, non-employed workers or job applicants.

3. Related Policies

This Privacy Notice applies in addition to the school's other relevant policies, including:

- Your contract of employment or engagement and the staff code of conduct.
- The school's Data Protection and Privacy Notice for Parents/Pupils.
- The IT Acceptable Use Policy.
- The CCTV and site security arrangements.
- Disciplinary, safeguarding, anti-bullying and health and safety policies.
- The Low-Level Concerns Policy.
- The Retention of Records schedule.

4. How We Collect Your Information

We may collect your personal data in the following ways:

- From information you provide during the application process (application forms, covering letters, self-declarations, interviews).
- From third parties, including the Disclosure and Barring Service (DBS), referees, your previous or current employers, and (for shortlisted candidates) online suitability checks.
- During the course of your employment — through performance appraisals, reports, correspondence, emails on school systems, and day-to-day interactions.
- From monitoring of school IT systems, including network activity monitored by NeuralShield (the school's AI-powered network safeguarding system — see Section 8).
- From CCTV recording on the school premises.
- When you update your contact details or personal circumstances.

5. The Types of Information We Collect

We may collect and process the following categories of personal data:

- Contact information: name, title, address, email, telephone numbers, emergency contact details and next of kin.
- Biographical information: date of birth, gender, nationality, photograph, education history, qualifications and professional memberships.
- Financial information: bank details, tax status, national insurance number, pension information.
- Employment information: employment history, references, work product, performance appraisals, disciplinary records, training records.
- Recruitment information: application forms, interview notes, right to work documentation, DBS certificate details.
- IT usage data: network activity, browsing history, email metadata and content on school systems (monitored via NeuralShield and standard IT management).
- CCTV footage: images captured by security cameras on the school premises.

Special category data — we may also process:

- Health and medical information (sickness absence, fitness to work, reasonable adjustments).
- Racial or ethnic origin (equal opportunities monitoring).
- Trade union membership.
- Criminal convictions and offence data (DBS checks, self-declarations, allegations).

- Religious beliefs (where relevant to your role or equal opportunities monitoring).

Special category data is processed only where there is a lawful basis, such as employment law obligations, safeguarding duties, vital interests, or your explicit consent.

6. Lawful Bases for Processing

6.1 Contract

Processing necessary for the performance of your employment contract or to take steps before entering into a contract, including:

- Administering job applications and making offers of employment.
- Paying salaries, administering pensions and benefits.
- Managing performance, attendance and disciplinary matters.
- Maintaining personnel records.

6.2 Legal Obligation

Processing necessary to comply with legal obligations, including:

- Child welfare and safeguarding duties (KCSIE 2025, Children Act).
- Tax, national insurance and accounting (HMRC).
- Immigration and right to work checks.
- Health and safety obligations (RIDDOR, COSHH).
- Equality and diversity monitoring (Equality Act 2010).
- Reporting to regulatory bodies (DBS, TRA, ISI, DfE, LADO, police).

6.3 Legitimate Interests

Processing necessary for our legitimate interests in running the school in a professional, safe and sustainable manner, including:

- Security — operating CCTV and NeuralShield network monitoring.
- Monitoring use of school IT systems in accordance with the IT Acceptable Use Policy and KCSIE 2025.
- Enabling regulatory authorities to monitor the school's performance.
- Management planning, statistical analysis and reporting.
- Providing references to other employers.
- Publishing your image in connection with your role (school website, newsletters) — you may opt out of non-essential image use.

6.4 Low-Level Concerns

We process personal data about you in accordance with our Low-Level Concerns Policy. Records of low-level concerns are retained for at least 7 years following the termination of your employment, or longer where relevant to safeguarding. Low-level concerns that relate exclusively to safeguarding (and not to misconduct or poor performance) are not included in references.

7. Who We Share Your Data With

We may share your personal data with the following recipients, where necessary and proportionate:

- Payroll providers, pension administrators and benefits providers.
- The DBS, HMRC, DfE, police, Home Office, CAF/CASS and local authority.
- Regulatory bodies: the Teaching Regulation Agency (TRA), Independent Schools Inspectorate (ISI) and the LADO.
- External auditors, inspectors, legal advisers and insurers.
- Other employers (in the form of a reference).
- IT service providers who process data on our behalf (data processors), including those supporting NeuralShield, the school's MIS (SkoolMIS), and Microsoft 365.

We will not share your personal data with third parties for marketing purposes. Where we share data with data processors, we ensure appropriate data processing agreements are in place.

8. IT Monitoring and NeuralShield

The school operates NeuralShield, an AI-powered network safeguarding system that monitors all internet traffic on the school network. As a member of staff, you should be aware that:

- Your use of the school network, including browsing history, search queries and email metadata, is monitored in real time.
- NeuralShield uses AI classification to identify potential safeguarding concerns, security threats and policy breaches.
- Monitoring data is stored securely and accessed only by authorised personnel (the IT Lead and DSL) for safeguarding and security purposes.
- Monitoring is conducted in accordance with the IT Acceptable Use Policy, the Regulation of Investigatory Powers Act 2000 (RIPA), the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000, and UK GDPR.
- The lawful basis for this monitoring is legitimate interests (safeguarding and security) and legal obligation (KCSIE 2025 filtering and monitoring requirements).

9. How Long We Keep Your Data

- Unsuccessful applicants: personal data is deleted within 6 months of the recruitment decision, unless we notify you of an intention to retain it longer.
- Current and former staff: personal data is retained for 6 years after the end of your contract, in line with limitation periods for legal claims.
- Safeguarding records: retained for longer in accordance with statutory requirements and DfE guidance (including KCSIE).
- Low-level concerns: retained for at least 7 years post-termination.
- NeuralShield logs: retained in accordance with the school's data retention schedule.
- CCTV footage: retained for a maximum of 30 days unless required for an investigation.
- DBS certificates: certificate numbers recorded on the SCR; certificates destroyed within 6 months of receipt.

10. Your Rights Under UK GDPR

You have the following rights in relation to your personal data:

- Access: the right to obtain a copy of the personal data we hold about you.
- Rectification: the right to have inaccurate data corrected.
- Erasure: the right to have your data erased in certain circumstances.
- Restriction: the right to restrict our processing in certain circumstances.
- Portability: the right to receive your data in a structured, commonly used format.
- Objection: the right to object to processing based on legitimate interests.
- Withdrawal of consent: where processing is based on consent, you may withdraw it at any time without affecting the lawfulness of prior processing.

These rights are not absolute and may be subject to exemptions. The school will respond to requests within one month (or up to three months for complex requests). To exercise your rights, contact the Data Protection Lead (see Section 12).

11. Data Security

The school takes appropriate technical and organisational measures to protect your personal data, including:

- Access controls and role-based permissions on school systems.
- Encryption of portable devices and data in transit.
- Regular security updates and patching.
- Staff training on data protection and information security.
- Secure disposal of physical and digital records.
- NeuralShield network security monitoring (intrusion detection, malware blocking).

12. Contact and Complaints

If you have any queries about this Privacy Notice or wish to exercise your rights, please contact:

- Data Protection Lead: Jevash Dey (Business Manager) — j.dey@vitaetpax.co.uk
- Head Teacher: Darren May — head@vitaetpax.co.uk
- School Office: 020 8449 8336

If you are not satisfied with how we handle your complaint, you have the right to complain to the Information Commissioner's Office (ICO): www.ico.org.uk. The ICO recommends that you seek to resolve any issues with the school before making a formal referral.

Approved by: Governing Body of Vita et Pax Preparatory School

Date: 1 March 2026