WHITE HOUSE SCHOOL

Privacy Notice for Staff

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Date: August 2026

CAVENDISH EDUCATION

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1. Context

The White House School is an independent specialist school for children and young people with additional and complex needs. We are part of Cavendish Education and are committed to transforming lives through highly personalised education, therapeutic support and ambitious teaching.

Our vision is **"Making Learning Possible Again."** We create a school where pupils feel safe, belong, achieve and thrive. Through removing barriers to learning, rebuilding confidence and fostering positive relationships, we empower every pupil to realise their potential and prepare for successful and fulfilling lives beyond school.

Our mission is to provide a nurturing, ambitious and mindful education that supports both academic progress and personal growth. Guided by our whole-school ethos of **Healthy Minds, Happy Hearts**, we create the conditions for every pupil to become **Ready to Learn and Prepared for Life**.

Everything we do is underpinned by our core values:

- **Ambition** – developing curiosity, courage and aspiration.
- **Resilience** – developing confidence, character and perseverance.
- **Community** – demonstrating kindness, integrity and respect.

We believe that pupils thrive when they feel safe, understood and valued. Our culture is built upon strong relationships, high expectations and a commitment to seeing the strengths and potential in every child. We are deeply nurturing without lowering expectations and remain unashamedly ambitious for every pupil.

Our practice is informed by the National Autistic Society's **SPELL Framework**, which promotes:

- Structure and predictability;
- Positive approaches and expectations;
- Empathy and understanding;
- Low arousal environments;
- Strong links between school, home and professionals.

Alongside this, we adopt a trauma-informed, relational and therapeutic approach across all aspects of school life. We recognise that behaviour is a form of communication and believe that pupils do well when they can. Our role is to understand the barriers they face and provide the support, strategies and relationships that enable them to succeed.

At The White House School:

- Every interaction is viewed as an intervention.
- Every adult is an emotionally available adult.
- Relationships come first.
- Emotional readiness is the foundation for learning.

We support pupils to develop emotional regulation, communication, independence and social understanding through consistent relational practice, personalised support and integrated therapeutic approaches. Emotional regulation is explicitly taught through co-regulation, sensory support, movement opportunities and personalised regulation strategies. Pupils are encouraged to understand themselves, develop resilience and build the skills needed to navigate life successfully.

Safeguarding is at the heart of everything we do. We recognise the additional vulnerabilities that many pupils with special educational needs may experience and maintain a culture of vigilance, care and advocacy. We place the child at the centre of decision-making, listen to pupil voice in all its forms and work closely with families and external agencies to promote safety, wellbeing and positive outcomes.

Through ambitious and adapted teaching, meaningful relationships, therapeutic support and a culture of belonging, we help pupils feel safe, build confidence, achieve success and thrive both in school and beyond.

2. Introduction

This Privacy Notice for school workforce explains how and why we store personal information about those employed by the school or otherwise engaged to work at the school. It provides a guide to our legal obligations and their own rights. Like any organisation which handles personal data, our school is the 'Data Controller' as such, we are registered with the ICO (Information Commissioner's Office) and we comply with UK General Data Protection Regulation (UK GDPR).

Under UK data protection law, individuals have a right to be informed about how our school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

We, The White House School, are the 'data controller' for the purposes of UK data protection law.

Our data protection officer is Lisa Dando, Assistant Headteacher (see section 16 for contact details).

3. Aims

This notice aims to:

- Ensure compliance with data protection legislation, including the UK GDPR and the Data Protection Act 2018.
- Inform applicants of their data protection rights and how to exercise them.
- Provide transparency regarding the lawful basis for processing personal data.
- Outline how long personal data will be retained and the criteria for determining retention periods.
- Clarify who has access to applicant data and under what circumstances it may be shared with third parties.
- Assure applicants that their personal data will be handled securely and confidentially.

4. Legislation and Guidance

This notice meets the requirements of the following legislation and guidance:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Human Rights Act 1998
- Information Commissioner's Office (ICO) Guidance on Privacy Notices, Transparency and Control
- ICO Employment Practices Guidance
- Government Digital Service (GDS) Privacy Notice Guidance

5. The Personal Data We Hold

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

Personal Information	Name, date of birth, gender, address, email address, telephone number, marital status Employee or teacher number Medical conditions Next of kin and emergency contact numbers Bank account details, payroll records, National Insurance number and tax status information Copy of driving licence
Characteristics	Ethnicity, language, nationality, country of birth
Attendance Information	Sessions attended, number of absences, reasons for absence

Employment / Recruitment / Contract Information	References Self-Disclosure forms DBS checks Verification of the right to work in the UK Start dates Hours worked Post / roles Salary, annual leave, pension and benefits information P45 forms Pensions information Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
Other	Appraisal / Performance Management notes and reports Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships DBS evidence Disciplinary information Performance information Outcomes of any disciplinary and/or grievance procedures

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Any health conditions you have that we need to be aware of
- Sickness records
- Photographs and CCTV images captured in school
- Trade union membership

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

6. Why We Use This Data

We use the data listed above to:

- Enable you to be paid

- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable equalities monitoring
- Improve the management of workforce data across the sector
- Provide support to staff when required (e.g. medical emergencies)
- Maintain high standards of performance from the workforce

Under the UK General Data Protection Regulation (UK GDPR), the legal basis / bases we rely on for processing personal information for general purposes are:
(6a) Consent: employees and others who work in the school have given clear consent for us to process their personal data for the purposes indicated above.
(6c) A Legal obligation: the processing is necessary for us to comply with the law.
(6d) A duty to safeguard pupils: the processing is necessary in order to protect the vital interests of the data subject (e.g. we are required to have evidence that staff have DBS clearance)
(6e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
The lawful bases for processing personal data are set out in Article 6 of the UK General Data Protection Regulation.
Special Categories of data are set out in Article 9 of the UK General Data Protection Regulation. The White House School will work within the conditions of GDPR - Article 9 of the UK GDPR:
(9.2a) explicit consent. In circumstances where we seek consent, we make sure that the consent is unambiguous and for one or more specified purposes, is given by an affirmative action and is recorded as the condition for processing. Examples of our processing include staff dietary requirements, and health information we receive from our staff who require a reasonable adjustment to access our site and services.
(9.2b) 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 in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.
(9.2c) where processing is necessary to protect the vital interests of the data subject or of another natural person. An example of our processing would be using health information about a member of staff in a medical emergency.
(9.2f) for the establishment, exercise or defence of legal claims. Examples of our processing include processing relating to any employment tribunal or other litigation.
(9.2g) reasons of substantial public interest. As a school, we are a publicly funded body and provide a safeguarding role to young and vulnerable people. Our processing of personal data in this context is for the purposes of substantial public interest and is necessary for the carrying out of our role. Examples of our

processing include the information we seek or receive as part of investigating an allegation.
(9.2j) for archiving purposes in the public interest. The relevant purpose we rely on is Schedule 1 Part 1 paragraph 4 – archiving. An example of our processing is the transfers we make to the County Archives as set out in our Records Management Policy.
We process criminal offence data under Article 10 of the UK GDPR.
Our Data Protection Policy highlights the conditions for processing in Schedule 1 of the Data Protection Act 2018 that we process Special Category and Criminal Offence data under.

7. Use of Your Personal Data for Marketing Purposes

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.
You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

8. Use of Your Personal Data in Automated Decision Making and Profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

9. Our Lawful Basis for Using this Data

Our lawful bases for processing your personal data for the purposes listed in section 6 above are as follows:

- For the purposes of the points in section 6 above, in accordance with the 'public task' basis – we need to process data to fulfil our statutory function as a school
- For the purposes of points in section 6 above, in accordance with the 'legal obligation' basis – we need to process data to meet our responsibilities under law
- For the purposes of points in section 6 above, in accordance with the 'consent' basis – we will obtain consent from you to use your personal data

- For the purposes points in section 6 above, in accordance with the 'vital interests' basis – we will use this personal data in a life-or-death situation
- For the purposes of points in section 6 above, in accordance with the 'contract' basis – we need to process personal data to fulfil a contract with you or to help you enter into a contract with us
- For the purposes of points in section 6 above, in accordance with the 'legitimate interests' basis – where there's a minimal privacy impact and we have a compelling reason.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

10. Our Basis for Using Special Category Data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest
- For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:
- We have obtained your consent to use it in a specific way

- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

11. Collecting this Data

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice. 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.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals

12. Storing this Data

We keep personal information about you while you work at our school. We may also keep it beyond your employment at our school if this is necessary. Our GDPR Policy sets out how long we keep information about staff. A copy of this policy can be requested from the school office.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please visit Policies | The White House

13. Sharing this Data

We do not share information about you with any third party without consent unless the law and our policies allow us to do so. Where it is legally required or necessary (and it complies with UK data protection law), we may share personal information about you with:

- Local Authorities (BCP/Dorset etc) – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Government departments or agencies
- Any youth support services providers
- Our regulator, Ofsted
- Suppliers and service providers: - GL Assessment - Curriculum and assessment monitoring
- Financial organisations
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please visit Policies | The White House

Who We share Workforce Information With

We routinely share aspects of workforce information with:

- Our local authority
- The Department for Education (DfE)
- Suppliers and service providers with whom we have a contract.

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

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.

Department for Education

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 school employees with the (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 'How Government uses your data' section.

Suppliers and Service Providers

We are required to share certain information about our school workforce with suppliers and service providers (e.g. pensions information) to enable staff to undertake the legal responsibilities of their role.

14. Your Rights

How to Access Personal Information that We Hold About You

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that apply):

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

Your Other Rights Regarding Your Data

Under UK data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

15. Withdrawal of Consent and Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance. Alternatively, you can make a complaint to the Information Commissioner's Office:

- Where we process your personal data based on your consent, you have the right to withdraw that consent at any time.
- To request the withdrawal of your consent, please contact Lisa Dando, Assistant Headteacher lisa@thewhitehouseschool.org. We will respond to your request promptly and ensure that your data is no longer processed on the basis of consent, unless another lawful basis applies.
- Under Section 164A of the Data Protection Act 2018, you have a statutory right to complain if you believe your personal data has been handled inappropriately.

- If you wish to raise a concern about how we process your personal data, please contact us directly Lisa Dando, Assistant Headteacher lisa@thewhitehouseschool.org. . We will acknowledge your complaint within 30 days of receipt and take appropriate steps to investigate and respond without undue delay.
- If you are not satisfied with our response, you may escalate your complaint to the Information Commission at: Information Commissioner's Office

- Report a concern online at https://ico.org.uk/make-a-complaint/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

16. Contact Us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer Lisa Dando, Assistant Headteacher at 19Lisa@thewhitehouseschool.org

17. Monitoring Arrangements

This notice will be reviewed annually by an executive director and shared with the headteacher.

18. Links to Other Policies

This notice should be read in conjunction with:

- Privacy Notice for Pupils
- Privacy Notice for Visitors
- Privacy Notice for School Board Member and Volunteers
- GDPR Policy

19.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 (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

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

Approval & Policy Review

This Policy has been reviewed and approved by:

Policy Approver(s)	Elle Vinall - Headteacher
Storage Location	Online
Effective Date	September 2026
Next Review Date	July 2027

Version	Change	Author	Date of Change
1	Updated policy for new academic year	Elle Vinall	July 2025
2	Updated format to match Cavendish Policies.	Lisa Dando	September 2026