

STAFF PRIVACY NOTICE

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Lead responsibility:	Director

Distribution to:	
All Staff	☒
SLT only	☐
Teaching Staff/Tutors	☐
Administration Staff	☐
Other (please specify)	

Key Contacts:	
William Barrett-Bell - Director	01438 727667
Information Commissioners Office	www.ico.org.uk

This Policy supersedes any previous Policy of this name or instructions that pre-date this edition.

It is a condition of employment that you give your explicit permission for Barrett-Bell Limited to process data about you, including sensitive or special categories of personal data, both manually and electronically, in accordance with the UK General Data Protection Regulation (GDPR) and Data Protection Act 2018.

STAFF PRIVACY NOTICE

1 Policy Statement

Barrett-Bell Ltd does all it can to ensure that Staff information is safe and secure. The Company is committed not only to the letter of the Law, but also to the spirit of the Law and places high importance on the correct, lawful and fair handling of all personal data, respecting the legal rights, privacy and trust of all individuals with whom it deals.

This Notice must be read in conjunction with the Data Protection Policy.

2 Regulations

Following the UK's departure from the EU, the GDPR was incorporated into the domestic Law that applies in the UK, under Section 3 of the European Union (Withdrawal) Act 2018 (the "Withdrawal Act"). UK Data Protection Law is primarily governed by the UK GDPR and the Data Protection Act 2018 (DPA), amended by the Data (Use and Access) Act 2025 (DUAA). The Privacy and Electronic Communications Regulations (PECR) relates to specific exemptions for analytics and security (e.g. website cookie consent) from February 2026.

3 Principles

When you join as an employee, you will need to complete and sign, various Contracts and Agreements. Every organisation or sole trader who processes personal information needs to pay a data protection fee to the Information Commissioner's Office (ICO), unless they are exempt. Barrett-Bell Ltd are registered with the Information Commissioners Office, allowing us to lawfully process this data.

This allows us to process your details. It is a condition of enrolment that Learners give their explicit permission for Barrett-Bell Limited to process data about individuals, including sensitive or special categories of personal data, both manually and electronically, in accordance with the UK General Data Protection Regulations (GDPR) and Data (Use and Access) Act 2025 (DUAA).

- 3.1 **Who we are** – Barrett-Bell Ltd (and the partners it uses to deliver courses) is a reputable company that has delivered ESFA training courses successfully for many years.
- 3.2 Barrett-Bell Ltd's **lawful basis for processing data**, is our mandatory obligation to gather the information required by our governing bodies, CPD records, awarding bodies, ESFA, OfSTED Payroll, Inland Revenue and accountants/auditors. In order for our use of your personal data to be lawful, Barrett-Bell Ltd needs to meet one (or more) conditions in the data protection legislation. For the purpose of our courses the relevant condition is Article 6(1)(a) ie. that you have given your consent.
- 3.3 **The nature of the data we will collect** will only be that which is required by the ESFA, Examination Board, External Inspection, HMRC, accountants/auditors and for the effective delivery of Barrett-Bell Ltd and partner courses. This will include:
- Correspondence both electronic and paper based
 - Personal data for holding a paid job
 - Recruitment data
 - Any disclosed special need or health requirement
 - Payment records
 - Attendance and Punctuality
 - Past or other current Employment
- 3.4 **Who we will give your personal data to** might include contracted partners and/or other partner organisations, funding agencies, ESFA and Examination Bodies, Payroll, Financial organisations (with whom we need to share your personal data for specific purposes). We will not share with any other organisation unless directed by the member of

Staff and permission granted. We will not share your data without permission, except for Safeguarding reasons with other services.

3.5 **How we will keep your data** by storing within secure storage systems, both hard copies and electronic, and will not be used or disclosed for purposes other than those described within this Privacy Notice.

3.6 **How long we will keep your personal data** depends on the requirements by the DfE, ESFA, HMRC, HR and other key Stakeholders who set the expectations. In compliance with best Safer Recruitment Applications of non-appointed Staff will be shredded immediately the role is filled (see Appx I for other important timescales).

3.7 **Your data protection rights** (also see Section 5) are always valid and Barrett-Bell Ltd adheres to the best practice and legislation:

- Upon request, you may be given access to information held within our system as regards to your personal data. Barrett-Bell Ltd will comply with correctly addressed Subject Access Requests (SAR) for access to personal information as quickly as possible and will ensure it is provided within one calendar month, unless there is a good reason for the delay which will be notified to the person making the request.
- The owner of the information may challenge the accuracy and completeness of information held and have it amended appropriately.

4 Process

4.1 Barrett-Bell Ltd and its delivery partners will:

- Only collect data that we have a statutory and legal requirement to gather (see Appx II for Categories)
- Only pass your data to relevant external bodies, e.g. HMRC
- Only keep your data for as long as our legal and statutory requirements allow (or longer if agreed by the individual)
- Destroy your data securely

- Provide you with a report of data held on request
- Audit data annually to ensure all Staff data and CPD records held are accurate and up to date

4.2 Barrett-Bell Ltd and its delivery partners will not:

- Share your data with anyone outside Barrett-Bell Ltd without your permission (except the relevant external bodies mentioned above)
- Sell your data to a third party
- Use your data to discriminate against you

4.3 Barrett-Bell Ltd and its delivery partners will handle all data by:

- Collecting data for specified, explicit and legitimate purposes and not further processed in a manner that is incomplete with those purposes
- Processing data lawfully, fairly and in a transparent manner in relation to individuals
- Ensuring data is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed
- Ensuring data is accurate and, where necessary, kept up to date
- Ensuring data is retained only for as long as necessary
- Ensuring data is processed in an appropriate manner to maintain security

4.4 In accordance with the HR and employment regulations and in accordance with data protection legislation, Staff personal information is used by Barrett-Bell Ltd to exercise its functions to meet its statutory responsibilities. Barrett-Bell Ltd may share personal information with third parties for education, training, employment, research and financial auditing in relation to any employment facilitated by Barrett-Bell Ltd and its delivery partners.

4.5 Barrett-Bell Ltd is accountable for security and confidentiality of all data we collect. This is overseen by our Data Processor. A number of measures are in place to ensure Barrett-Bell Ltd are accountable as the Data Controller:

- Adopting and implementing Data Protection Policies
- Putting written contracts in place with organisation that process personal data on our behalf
- Maintaining documentation of our processing activities
- Implementing appropriate security measures
- Recording and, where necessary, reporting personal data breaches
- Adhering to relevant Codes of Conduct
- Implementing a privacy framework to create a culture of privacy
- Keeping individuals informed of data collected, secure storage, retention, disposal and updates

5 Staff Rights

5.1 Staff have the following rights:

- The right to be informed about data
- The right to question what data is kept
- The right of access to their own data
- The right to rectification if data is wrong
- The right to having data erased when no longer valid
- The right to restrict processing of unnecessary data
- The right to object to any data which is not necessary or wrong

5.2 **Consent** - When you sign your Employment Contract and accept the Staff Privacy Notice, you are expressly giving your permission to Barrett-Bell Ltd to process your data, including sensitive or special categories of personal information about you, as described below. This

is a condition of your employment. Your information will not be used to make personal decisions about you:

- Consent shall be freely given, fully informed and evidenced on appropriate documentation
- Requests for consent shall be easily understood, in plain English and unambiguous
- Consent can be withdrawn at any time for data, which is not statutory and lawfully required for the course
- Silence, inactivity, lack of response and pre-ticked boxes are not to be taken as indicating consent

5.3 In the rare exception of a **data breach** – the regulations outlined in the Data Protection Policy will be followed. If any breach affects Learners adversely in any way, they will notified without delay. Learners should report any suspected breaches to the Directors but retain the right to report a data breach directly to the Information Commissioner's Office www.ico.org.uk

5.4 Barrett-Bell Ltd operate a number of **CCTV** cameras in order to assist with the security of the Company and protect property and individuals. If any member of Staff has any queries regarding the operation of the CCTV system, they should contact the Director. The images are held in secure conditions for 30 days, and previous data is automatically erased.

5.5 The Barrett-Bell Ltd website uses **cookies** to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site. Consent is no longer required for specific, low-risk cookies. This includes first-party analytics cookies used strictly by the website operator and cookies used solely to customise appearance or display preferences (such as accessibility settings. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

6 Staff Responsibilities

It is useful for Staff to read the mirror Privacy Notice for Learners at this stage. Both Staff and Learners are the main individuals that can support the learning environment to be safe and secure regarding personal data.

6.1 All members of Staff are responsible for:

- Checking that any information they provide to Barrett-Bell Ltd in connection with their employment or enrolment is accurate and up to date
- Informing Barrett-Bell Ltd of any changes in their circumstances or contact details e.g. change of address, marriage, change of benefits
- Barrett-Bell Ltd cannot be held responsible, for any errors unless the staff member has informed the Company of any changes to be made
- Security of their computers and security of their passwords
- Following UK GDPR guidelines, rules and regulations
- Following Data Protection Rules and regulations

6.2 All Staff have a duty to make sure they comply with GDPR and Data Protection, set out in the Barrett-Bell Ltd Policies and published in the data drive, under Policies and Procedures.

6.3 In particular, staff must ensure all tutorial records and other personal and sensitive student information be retained in the student's personal folder.

6.4 Data processing on a regular basis, eg. when marking registers, marking or grading coursework or examination papers, writing

reports or references, or as part of an academic supervisory or administration role also must follow legislation guidelines.

6.5 Staff must ensure that any Learner data for which they are responsible is:

- Kept in a locked filing cabinet
- Kept in a locked drawer temporarily if no cabinet available immediately
- If computerised, be password protected (and password regularly changed)
- If kept on other media (e.g. hard disk, USB stick kept secure in lockable drawer), be password protected

6.6 No member of Staff should disclose any Learner or peer personal information (including accidentally) either orally or in writing or by any other method to any unauthorised third party.

6.7 Anyone requesting copies of data held or enquiring about GDPR/DPA should be sign-posted to the Data Protection Officer or Directors. Staff must not deal with such requests under any circumstances and never supply any personal information regarding Learner or peers to non-Barrett-Bell Ltd Staff.

6.8 Gathering and disclosing information must only be with the explicit written and signed approval of the data subject. This includes information to prospective employers. Learners will be requested to give consent on Induction.

6.9 Staff should be aware that unauthorised disclosure will usually be a disciplinary matter and could be considered gross misconduct in some cases. In line with the GDPR/DPA they may also be liable financially.

All members of staff must follow the Guidelines for GDPR and DPA. This is for the safety and benefit of all staff and Learners at Barrett-Bell Ltd.

Appendix I - Retention Timescales

Learner Data is held by Barrett-Bell Ltd and our third-party examination organisations, for statutory periods:

- Barrett-Bell Ltd hold staff details, qualifications, appraisals, reviews HR files for a minimum period of 5 years after the end of employment. Financial information must be held for a period of 3 years after the end of employment.
- Barrett-Bell Ltd hold Portfolios and assessment documentation for a minimum of 3 years post completion, in accordance with awarding bodies.
- Barrett-Bell Ltd hold individuals contact information and qualification dates for a minimum of 5 years for those who have consented (we will contact Learners to remind them of their renewal dates and inform them of courses relevant to them).
- Barrett-Bell Ltd hold copies of ID for Learners until their loan has been approved, at which time it is shredded and documented as shredded correctly.
- City & Guilds hold individual's registration and certification information for 6 years.
- Blueflame hold individual's registration, ACS elements course work, certification information for 6 years.
- ESFA hold information for a period of 6 years.
- Tracpipe hold copies of certificates without timescale to ensure those working with their product are qualified.

If at any time you wish to withdraw your permission for Barrett-Bell Ltd to hold your information, please contact us on info@barrettbell.co.uk, 01923 253866.

If you wish to investigate the UK GDPR further, please go to the Information Commissioners Office website www.ico.org.uk.

Appendix II – Categories

TYPE OF INFORMATION HELD	DESCRIPTION	PROCESSING INFORMATION
1. Personal Details	Name, address, contact numbers, NINO, email, gender, DOB, age, ethnicity, nationality, emergency contact details, medical conditions, disabilities, support needs. Sickness and attendance.	This information is held in your HR file in hard copy. Details are also passed to the accountant for salary payment, tax and pension payments. We also have an external HR company Peninsula who hold HR files on staff.
2. Qualifications	Previous qualifications details, ongoing training details and completed training whilst working for Barrett-Bell Ltd.	We keep a copy of your certificates in your HR hard copy file and an electronic record of all staff training records.
3. DBS Checks	Secure checks to ensure we have covered all legal requirements for employment.	We use DBS Assist to facilitate the checks with your consent. We are sent electronic information about causes of concern and hold a copy of the reference numbers.
4. Bank Details	Bank name, sort code, account number.	Our accountant is Tom Sullivan and, with your consent, we send him your bank details, tax codes, contact details, pension information and annual gross salary details in order to pay your wages.
5. Continuous Professional Development (CPD)	Ongoing training and development during your employment	We hold copies of certificates relating to your CPD and courses you complete, including online courses, whilst employed at Barrett-Bell Ltd.
6. Performance Reviews and Targets	Documentation from performance reviews, targets set.	We hold copies of the performance reviews and targets set and any other information discussed during your reviews, in your HR file.
7. CV	Curriculum Vitae, created by yourselves	We hold a hard copy of your CV in your HR file.
8. References	References supplied by yourself	We request information about you from the referees you supply before employment. This information is held in your HR file.