SUSSEX TEACHERS LTD

Privacy Notice

How we use the personal data of work-seekers, school and client contacts, referees and website visitors

Company	Sussex Teachers Ltd ('we', 'us', 'the Company'), an independent, family-owned primary school supply teaching agency based in Brighton and Peacehaven, East Sussex
Role under data protection law	Data controller
ICO registration number	A8286918
Data Protection Lead	Michael Bradbury, mike@sussexteachers.co.uk
Data Protection Officer	Louise Bradbury, office@sussexteachers.co.uk
Document type	Privacy Notice (applies whether we collect your data from you or from another source)
Version and date	Version 2026.1, effective 1 October 2026. Replaces the notice dated 25 May 2018
Next review	By 1 October 2027, or sooner if the law or our processing changes
Legal framework	UK GDPR, Data Protection Act 2018 and the Data (Use and Access) Act 2025, Privacy and Electronic Communications Regulations 2003 (PECR)

1. Who we are and what this notice covers

Sussex Teachers Ltd has supplied supply teachers and other education staff to schools and nurseries since 2007. To provide work-finding services we must process personal data, including special category data and criminal offence data. In doing so we act as a data controller.

This notice explains what personal data we collect, why we use it, who we share it with, how long we keep it and what rights you have. It applies to:

- **work-seekers**: teachers, teaching assistants and other staff who register with us or are placed by us;
- **contacts at client schools, nurseries and local authorities**, including headteachers, deputy heads, SENCos and business managers;
- **referees** named by work-seekers; and
- **visitors to our website** and anyone who contacts us.

You may give us your details directly, for example on a registration form, by email or through our website. We may also receive them from another source such as a job board, a school or a referee. Where we receive your data from someone else, we will give you this notice within one month, and at the latest when we first contact you or first share your data.

2. The personal data we collect

Type of data	Examples
Identity and contact	Name, address, telephone number, email address, date of birth, National Insurance number, photograph and copies of identity documents
Registration and work preferences	CV, employment history and gaps, qualifications, teacher reference number (TRN), QTS or ECT status, year groups and areas you will work in, availability, travel range
Vetting and safeguarding checks	Right to work evidence, enhanced DBS certificate details and outcome, DBS Update Service status, barred list check, Teaching Regulation Agency (TRA) status and prohibition checks, overseas checks, references, identity and address verification, and checks of publicly available information where schools require them under statutory safeguarding guidance
Health information (special category data)	Confirmation of your fitness to work with children, medical or occupational health assessments where required, and any reasonable adjustments you ask us to pass on
Criminal offence data	Convictions, cautions, reprimands and warnings, including spent and unspent matters that appear on an enhanced DBS certificate, and overseas equivalents
Pay, tax and pension data	Bank details, tax code, student loan status, pension auto-enrolment records, timesheets, holiday and sick pay records
Assignment and performance data	Assignments worked, feedback from schools, concerns, complaints, allegations and the outcome of any investigation
Communications and technical data	Emails, call and message notes, and where you use our website, your IP address and information collected through cookies (see section 12)
School and client contact data	Name, job title, school, work email address and telephone number, communication preferences and records of our dealings with you

3. Where we get your data from

- you, directly, or from people you ask to contact us on your behalf;
- schools and nurseries, about your performance, conduct or any concerns;
- referees and former employers;
- vetting and regulatory bodies, including our DBS checking provider, the Disclosure and Barring Service, the Teaching Regulation Agency, and the Home Office right to work service;
- job boards, other agencies and umbrella companies, where you have applied or been registered through them;
- publicly available sources, such as school websites and the Department for Education's Get Information About Schools register, which we use to keep accurate business contact details for schools.

4. Why we use your data and our legal basis

We must have a lawful basis under Article 6 of the UK GDPR for every use of personal data. Where we use special category data or criminal offence data we also need an additional condition under Article 9 or Article 10 and Schedule 1 of the Data Protection Act 2018. These are set out below.

What we do	Lawful basis (Article 6)	Additional condition for special category and criminal offence data
Register you, assess your suitability and match you to assignments	Contract (steps taken at your request before entering a contract); legitimate interests	Not applicable unless health information is needed, see below
Carry out pre-engagement vetting and safeguarding checks that the law and statutory guidance require, including DBS, barred list, TRA, right to work, fitness to work and references	Legal obligation (including the Conduct of Employment Agencies and Employment Businesses Regulations 2003, Safeguarding Vulnerable Groups Act 2006, Education (Health Standards) (England) Regulations 2003 and the Immigration, Asylum and Nationality Act 2006)	Employment, social security and social protection law (Article 9(2)(b) and Schedule 1 paragraph 1); preventing or detecting unlawful acts and protecting the public (Schedule 1 paragraphs 10 and 11); safeguarding of children and of individuals at risk (Schedule 1 paragraph 18)
Carry out additional checks that our school clients require by contract or that we reasonably judge necessary to protect children	Legitimate interests (keeping children safe and meeting client requirements)	As above
Share your compliance information with schools and nurseries so they can complete their single central record and decide whether you are suitable for an assignment	Legitimate interests; legal obligation; contract	As above; Equality Act 2010 for reasonable adjustments
Pay you, deal with tax, National Insurance, pensions and statutory entitlements	Contract; legal obligation	Employment, social security and social protection law (Article 9(2)(b)) where health information is relevant to statutory pay
Manage complaints, disputes, allegations and legal claims, and keep records for audits and inspections	Legitimate interests; legal obligation	Establishment, exercise or defence of legal claims (Article 9(2)(f)); Schedule 1 paragraphs 10, 11 and 18 where relevant
Send you job alerts, newsletters and information about suitable roles	Consent, or where PECR allows, legitimate interests based on our existing relationship with you. You can opt out at any time	Not applicable
Contact school and client staff about our services (business to business communication)	Legitimate interests (developing our business and filling vacancies for schools)	Not applicable
Operate and secure our website and systems	Legitimate interests; consent for cookies that need it	Not applicable
Pass on health information you choose to give us beyond what is required, such as extra adjustments you ask us to tell a school about	Consent	Explicit consent (Article 9(2)(a)), which you can withdraw at any time

A change from our 2018 notice. Our previous notice said that we relied on your consent to process health and criminal offence data. Because vetting is a legal and contractual requirement of working in schools, consent is not the right basis for it, as you could not freely refuse and still be placed. We now

rely on the legal and employment conditions in the table above. We use consent only where you have a genuine choice.

Legitimate interests

Where we rely on legitimate interests, our interests are providing work-finding services to work-seekers and schools, keeping children safe, meeting our clients' requirements and running an efficient business. We have considered whether those interests are outweighed by your rights and freedoms and we record that assessment. You have the right to object (see section 10). The Data (Use and Access) Act 2025 added a list of 'recognised legitimate interests' to the UK GDPR. We do not routinely depend on that list, but may use it where one of its conditions clearly applies.

Statutory and contractual requirement

Much of the data above is required by law, by our contracts with schools, and to enter into a contract with you. If you do not provide it we will be unable to complete your registration or offer you work in schools and nurseries.

5. Who we share your data with

- **Client schools and nurseries**: information needed for their single central record and vetting checks, references, health information relevant to the role and any reasonable adjustments, criminal record information from your enhanced DBS certificate, safeguarding information including investigations and substantiated allegations, and other information reasonably required for the role.
- **Vetting and regulatory bodies**: GBG Group Plc (DBS checks), the Disclosure and Barring Service (including update checks), the Teaching Regulation Agency (teacher status and prohibition checks), the barred list checking service, UK Visas and Immigration and the Home Office (right to work), former employers and referees, and overseas criminal records agencies if you have lived abroad.
- **Health professionals**, where an assessment of your fitness to work in a school is needed.
- **Our service providers (data processors)**: companies that host and support our candidate management system, email and cloud storage, and our payroll, accountancy and pension providers. They may use your data only on our instructions and under written contracts that include security requirements.
- **Public authorities**: HMRC, pension providers, the Employment Agency Standards Inspectorate and other regulators, and the police, local authority designated officers or the Department for Education where the law requires or permits disclosure. We have a legal duty to refer certain safeguarding matters to the DBS and the TRA.
- **Professional advisers, insurers and auditors**, where needed to protect our legal position or comply with audit requirements.
- **A buyer of the business**, if we ever sell it, who would be bound to protect your data.

We do not sell your personal data.

6. Transfers outside the UK

We store and process your data in the United Kingdom and we do not routinely transfer it outside the UK. The only expected exception is where you have lived or worked overseas and a criminal records check from another country is needed. In that case we will send only the minimum data needed to the relevant overseas authority.

If we ever need to transfer personal data outside the UK for another reason, we will do so only where the UK GDPR allows it: to a country covered by UK adequacy regulations, or under an approved

safeguard such as the ICO's International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses, in each case ensuring the protection your data receives is not materially lower than in the UK.

7. How long we keep your data

We keep personal data only for as long as necessary for the purposes above. The main periods are shown below. Where a legal period applies we follow it. When a period ends, we securely delete or anonymise the data.

Data	How long we keep it
Work-seeker registration records (the minimum set by the Conduct of Employment Agencies and Employment Businesses Regulations 2003)	At least one year from the date of creation or from the date we last provided you with work-finding services, whichever is later. We then review the record and delete it unless we have a reason to keep it, such as an ongoing assignment or a safeguarding matter
Unsuccessful or incomplete registrations	Up to 12 months, then deleted
Right to work evidence	For the duration of the work relationship and for two years afterwards
DBS information	We record the date, number and outcome of each check. We do not keep a copy of the certificate for longer than six months
Vetting records, references and compliance checklists	For the duration of the work relationship and six years afterwards, so that we can evidence our checks to schools and inspectors and defend legal claims
Payroll, tax, holiday pay, sick pay and pension auto-enrolment records	Six years from the end of the relevant tax year, which covers the periods required by HMRC and by national minimum wage, social security and pension legislation
Safeguarding concerns, allegations and outcomes	Until you reach normal retirement age or for ten years from the date of the allegation, whichever is longer, unless the allegation is found to be false or malicious, in which case it is removed
Complaints and legal claims records	Six years from closure
Marketing preferences	Until you opt out. We keep a minimal record that you opted out so we do not contact you again
School and client contact data	While the contact remains in post and relevant, reviewed at least every two years

8. How we keep your data secure

We use technical and organisational measures to protect your data. These include checking original identity and qualification documents in person at registration; holding compliance records in our candidate management system and secure cloud storage with access limited to authorised staff; confidentiality obligations for everyone who handles data; written contracts with our suppliers; and regular reviews of who has access. We have procedures to detect, investigate and report data breaches. If a breach is likely to result in a high risk to you, we will tell you without undue delay.

9. Automated decisions and the use of software

We do not make decisions about you, such as whether to register you or offer you work, solely by automated means where those decisions have a legal or similarly significant effect on you. A person always makes those decisions. We may use software, including AI-assisted tools, to help with administration such as searching records or drafting messages. We use such tools only where suitable contractual and security protections are in place, and a person reviews the results before they are used to make a decision about you. If we ever change this, we will update this notice first and put in place the safeguards the law requires, including your right to human intervention and to challenge the decision.

10. Your rights

You have the following rights under data protection law:

- **to be informed** about how we use your data, which this notice does;
- **of access**: to receive a copy of the personal data we hold about you and information about how we use it;
- **to rectification**: to have inaccurate or incomplete data corrected;
- **to erasure**: to have data deleted in certain circumstances. We cannot delete data that we must keep by law, such as vetting and payroll records;
- **to restriction**: to ask us to limit how we use your data in certain circumstances;
- **to data portability**: to receive data you gave us in a structured, commonly used, machine-readable format, where we use it under contract or consent by automated means;
- **to object** to processing based on legitimate interests, and to object at any time to direct marketing;
- **in relation to automated decisions**: not to be subject to certain solely automated decisions with significant effects, and to have safeguards where they are allowed; and
- **to withdraw consent** at any time, where we rely on consent. Withdrawal does not affect processing already carried out.

How to use your rights

Contact the Data Protection Lead or Data Protection Officer using the details at the start of this notice. You do not need to use special words or a form. We will not charge a fee unless a request is manifestly unfounded or excessive, in which case we may charge a reasonable fee or refuse, and we will explain why.

We will respond within one month. The month runs from receipt of your request, or from the date we receive information we reasonably need to confirm your identity or to clarify what you are asking for, if that is later. We may extend the period by up to two further months for complex or numerous requests and will tell you if so. When you ask for a copy of your data, we carry out a reasonable and proportionate search for it. We may withhold information where the law allows, for example where it would reveal another person’s identity or is covered by legal professional privilege, and we will explain our reasons.

To opt out of marketing, use the unsubscribe link in any message or contact us at any time.

11. Complaints

If you are unhappy with how we have handled your personal data, please tell us first. You can complain by email to the Data Protection Lead or Data Protection Officer, using the details at the start of this notice. A template complaint form is available on request, and you can also simply write to us in your

own words. We will acknowledge your complaint within 30 days, investigate it, keep you informed and respond without undue delay, telling you the outcome.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK's data protection regulator, at ico.org.uk/make-a-complaint or by telephone on 0303 123 1113. If your data is processed outside the UK you may complain to the relevant supervisory authority there. You may also be able to apply to a court. Complaining to us does not affect your right to complain to the ICO.

12. Our website and cookies

Our website uses cookies. Cookies that are strictly necessary to run the site do not need your consent. We set cookies for other purposes, such as marketing or tracking, only if you consent, and you can change your choice at any time. Under recent changes to the law a small number of cookies, including some used to collect statistics about how the site is used, may be set without consent provided we tell you about them and give you a simple way to object. Our cookie banner explains which cookies are in use.

13. Changes to this notice

We review this notice at least once a year. If we make significant changes we will tell you, for example by email, and update the version and date at the start. The latest version is always available from us on request.