

# Little Acorns Montessori

## Privacy Notice — Staff & Volunteers

Bracknell | Ascot | Crowthorne

### 1. Document Control

|                         |                                                                                                                                                                                 |
|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Policy Title            | Privacy Notice — Staff & Volunteers                                                                                                                                             |
| Version                 | 1.0                                                                                                                                                                             |
| Date of Issue           | June 2026                                                                                                                                                                       |
| Next Review Date        | June 2027                                                                                                                                                                       |
| Author / Owner          | Jonathan Duffy                                                                                                                                                                  |
| Role                    | Director / Owner & Data Controller                                                                                                                                              |
| ICO Registration Number | ZA161231 (registered since 26 January 2016)                                                                                                                                     |
| Applies To              | All permanent, fixed-term, and agency staff, volunteers, students on placement, and contractors working at Little Acorns Montessori — Bracknell, Ascot, and Crowthorne campuses |

**⚠️ LEGAL FRAMEWORK NOTE:** This notice is issued under UK GDPR (as retained in UK law by the European Union (Withdrawal) Act 2018), the Data Protection Act 2018, and the Data (Use and Access) Act 2025 (DUAA). The DUAA received Royal Assent on 19 June 2025; core provisions are in force from 5 February 2026, with further provisions from 19 June 2026.

### 2. Policy Statement

Little Acorns Montessori Limited is committed to protecting the privacy, dignity, and legal rights of every member of its workforce. This Privacy Notice explains what personal data we hold about you as a member of staff or volunteer, why we hold it, how we use it, how long we keep it, and your rights under UK GDPR.

This notice applies to all personal data held in connection with your employment or placement, whether stored electronically, in paper form, or any other format.

### 3. Who We Are and How to Contact Us

Little Acorns Montessori Limited is the data controller for all personal data processed across our three campuses.

| Campus    | Address                                                   | Contact      |
|-----------|-----------------------------------------------------------|--------------|
| Bracknell | Berkshire Guide Centre, Windlesham Rd, Bracknell RG42 1GG | 01344 411928 |
| Ascot     | St Peters Hall, Hatchet Ln, Winkfield, Windsor SL4 2EG    | 01344 882942 |

| Campus     | Address                                                              | Contact      |
|------------|----------------------------------------------------------------------|--------------|
| Crowthorne | Buckler's Park Community Hub, Goodwood Crescent, Crowthorne RG45 6NB | 07592 542546 |

| Campus       | Data Protection Officer (DPO) | Data Controller |
|--------------|-------------------------------|-----------------|
| All campuses | Valerie Duffy                 | Jonathan Duffy  |

ICO Registration: ZA161231 | [ico.org.uk](https://ico.org.uk)

## 4. Statutory and Legal Framework

This Privacy Notice fulfils obligations arising from the following legislation and statutory guidance:

- UK General Data Protection Regulation (UK GDPR) — as amended by the Data (Use and Access) Act 2025
- Data Protection Act 2018
- Data (Use and Access) Act 2025 (DUAA) — introduces, among other changes, the Recognised Legitimate Interests (RLI) lawful basis for a defined set of pre-approved public interest purposes
- Employment Rights Act 1996
- Equality Act 2010
- Human Rights Act 1998
- Computer Misuse Act 1990
- Childcare Act 2006 and the EYFS Statutory Framework 2024 — governing suitability requirements and record-keeping
- Keeping Children Safe in Education (KCSIE) 2025 — adopted as best practice
- Working Together to Safeguard Children 2023
- IRMS Records Retention Schedule for Education 2022
- HMRC record-keeping requirements

## 5. What Personal Data We Collect and Why

We collect and process the following categories of personal data about you in connection with your employment or placement at Little Acorns Montessori Limited.

| Category of Data          | Examples                                                                                | Lawful Basis                |
|---------------------------|-----------------------------------------------------------------------------------------|-----------------------------|
| Identity and contact data | Full name, address, date of birth, National Insurance number, emergency contact details | Contract / Legal obligation |
| Recruitment data          | Application form, CV, references, interview notes, right-to-work documentation          | Contract / Legal obligation |
| Employment data           | Contract of employment, job title, start date, salary, appraisals, performance records  | Contract                    |

| Category of Data                   | Examples                                                                                                       | Lawful Basis                                                      |
|------------------------------------|----------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|
| Payroll and financial data         | Bank details, tax code, pay records, pension enrolment                                                         | Contract / Legal obligation (HMRC)                                |
| Suitability and safer recruitment  | DBS certificate number and outcome, self-declaration forms, barring list checks                                | Legal obligation (Childcare Act 2006 / EYFS)                      |
| Training and qualifications        | Copies of certificates, CPD records, induction training, first aid                                             | Legal obligation / Contract                                       |
| Health data (special category)     | Occupational health referrals, fit notes, reasonable adjustments, declared medical conditions relevant to role | Article 9(2)(b) — employment law obligations; Schedule 1 DPA 2018 |
| Disciplinary and grievance records | Investigation notes, letters, outcomes, appeals                                                                | Legitimate interests / Legal obligation                           |
| Safeguarding and allegations data  | Records of allegations made against staff, outcomes, referrals to the DBS or regulatory bodies                 | Legal obligation / Recognised Legitimate Interests (DUAA 2025)    |
| CCTV footage (where applicable)    | Images captured on setting-operated CCTV systems                                                               | Legitimate interests (DPIA completed)                             |

## 6. Special Category Data

Certain categories of data require additional protection under Article 9 of the UK GDPR. We may process the following special category data about you:

- Physical or mental health data — to make reasonable adjustments or manage absence
- Racial or ethnic origin — for equal opportunities monitoring (aggregated and anonymised)
- Religious or philosophical beliefs — to accommodate requests relating to working arrangements
- Criminal offence data — DBS check outcomes processed under the Childcare Act 2006 and EYFS suitability requirements

Special category data is processed only where there is a clearly documented additional lawful condition under Article 9 and Schedule 1 of the Data Protection Act 2018. Details are held in the Record of Processing Activities (ROPA).

## 7. Who We Share Your Information With

We may share your personal data with the following third parties where there is a lawful basis to do so. We will never sell your personal data.

| Recipient        | Purpose                                          | Lawful Basis                         |
|------------------|--------------------------------------------------|--------------------------------------|
| HMRC             | Payroll, tax, and National Insurance obligations | Legal obligation                     |
| Pension provider | Workplace pension auto-enrolment                 | Legal obligation (Pensions Act 2008) |

| Recipient                                 | Purpose                                                        | Lawful Basis                                       |
|-------------------------------------------|----------------------------------------------------------------|----------------------------------------------------|
| Payroll bureau / software provider        | Processing salary payments                                     | Contract (Article 28 DPA in place)                 |
| Disclosure and Barring Service (DBS)      | Criminal record checks for suitability verification            | Legal obligation                                   |
| Ofsted                                    | Inspection, regulatory oversight, and staff suitability checks | Legal obligation                                   |
| Local Authority Designated Officer (LADO) | Allegations management and referrals                           | Legal obligation / Recognised Legitimate Interests |
| NHS / Occupational health providers       | Fit-for-work assessments, reasonable adjustments               | Legitimate interests / Vital interests             |
| Insurance providers                       | Employers' liability and personal injury claims                | Legitimate interests                               |
| Police or regulatory bodies               | Where required by law, court order, or safeguarding duty       | Legal obligation                                   |

## 8. How Long We Keep Your Information

| Record Type                                                    | Retention Period                                                                                        | Authority                                                                 |
|----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| Staff personnel files and training records                     | 7 years after employment ends                                                                           | IRMS 2022 / HMRC                                                          |
| Staff DBS records                                              | 6 months after check is processed                                                                       | DBS Code of Practice                                                      |
| Payroll records                                                | 7 years                                                                                                 | HMRC requirements                                                         |
| Disciplinary and grievance records                             | 7 years after employment ends (or as long as appeal rights exist)                                       | IRMS 2022                                                                 |
| Allegations against staff (investigated, founded or unfounded) | Until staff member reaches age 65, or 10 years — whichever is longer                                    | IRMS 2022                                                                 |
| Records relating to allegations of child sexual abuse          | 75 years from date of allegation                                                                        | IICSA Final Report 2022                                                   |
| Occupational health records                                    | Until age 75 (where exposure to hazardous substances involved); otherwise 7 years after employment ends | Control of Substances Hazardous to Health (COSHH) Regulations / IRMS 2022 |
| CCTV footage (where applicable)                                | Maximum 30 days unless required for an ongoing investigation                                            | ICO Video Surveillance Guidance                                           |

## 9. Your Rights Under UK GDPR

You have the following rights in relation to the personal data we hold about you. Requests should be made in writing to the DPO.

### **9.1 The Right to Be Informed**

This Privacy Notice fulfils our obligation to tell you how your personal data is used at the point of data collection.

### **9.2 The Right of Access (Subject Access Request)**

You may request a copy of all personal data held about you. We must respond within one calendar month. This is free of charge unless the request is manifestly unfounded or excessive.

### **9.3 The Right to Rectification**

You may request that inaccurate or incomplete data is corrected. We will act within one calendar month.

### **9.4 The Right to Erasure**

You may request deletion of your data where there is no compelling reason for its continued processing. We may be legally required to retain certain records (see Section 8); in such cases, we will inform you in writing with the specific legal basis for retention.

### **9.5 The Right to Restrict Processing**

You may request that we limit how we use your data while a query or complaint is resolved.

### **9.6 The Right to Data Portability**

Where we process your data by automated means and on the basis of consent or a contract, you have the right to receive that data in a structured, machine-readable format, and to request that we transmit it to another organisation where technically feasible.

### **9.7 The Right to Object**

You may object to your data being used for purposes such as marketing. Such objections will be honoured promptly.

### **9.8 Automated Decision-Making and Profiling**

Little Acorns Montessori Limited does not use automated decision-making or profiling in relation to staff or volunteers. No decisions with legal or significant effects are made about individuals by automated means.

## **10. How We Keep Your Information Safe**

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### **10.1 Paper Records**

- All personnel files and related records are stored in locked filing cabinets in a secure office.
- Records must not be removed from the setting without written authorisation from the DPO.
- Files are treated as strictly confidential and accessible only to those with a legitimate need.

### **10.2 Electronic Records**

- All computers, laptops, and tablets are password protected.
- Role-based access controls are applied; you will only have access to data relevant to your role.

- When a staff member leaves, all associated passwords and access credentials are changed immediately.
- Personal devices must not be used to store, photograph, or transfer setting-related personal data.

### 10.3 Personal Data Breaches

In the event of a personal data breach, Little Acorns Montessori Limited is required to report to the ICO within 72 hours where there is a likely risk to individuals' rights and freedoms. Where a breach poses a high risk to you, you will be notified directly without undue delay.

If you become aware of or suspect a data breach, you must report it to the DPO immediately and without delay.

## 11. How to Raise a Concern or Complaint

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If you believe that Little Acorns Montessori Limited has not handled your personal data in accordance with UK GDPR, you may:

- Raise the matter with the DPO (Valerie Duffy) in the first instance.
- If the matter is not resolved to your satisfaction, you have the right to lodge a complaint directly with the ICO:

Website: <https://ico.org.uk/> | Telephone: 0303 123 1113

ICO Registration Reference for Little Acorns Montessori Limited: ZA161231

## 12. Policy Review

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This Privacy Notice must be reviewed annually, or sooner in the event of:

- A change in relevant legislation or statutory guidance
- A significant data breach or ICO enforcement action
- A material change in the way staff personal data is collected or processed
- New ICO guidance on the Data (Use and Access) Act 2025, including further commencement of provisions not yet in force

## 13. Sign-Off

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| Role             | Name           | Date      |
|------------------|----------------|-----------|
| Owner / Director | Jonathan Duffy | June 2026 |