

# Charlotte Lowe Psychological Services Ltd My Oasis Therapeutic Alternative Provision

## Staff Privacy Notice

**Data Controller:** Charlotte Lowe Psychological Services Ltd

**Contact for Data Protection Queries:** info@charlottelowepsychologicalservices.co.uk

### 1. Introduction

Charlotte Lowe Psychological Services Ltd, My Oasis Therapeutic Alternative Provision (“we”, “us”, “our”) are committed to protecting your personal data and respecting your privacy. This notice explains how we collect, use, store, and share personal data relating to staff members, including employees, contractors, and volunteers, in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

### 2. Purpose of Processing

We process your personal data to:

- Administer your employment or engagement, including payroll, pensions, benefits, and tax obligations.
- Comply with legal and statutory obligations, including safeguarding children and vulnerable adults (Keeping Children Safe in Education 2025, Working Together to Safeguard Children 2023).
- Manage training, performance management, professional development, and disciplinary matters.
- Maintain security and operational integrity, including monitoring access to systems and premises.
- Support health, safety, and occupational health requirements.
- Respond to requests, concerns, grievances, or complaints.

### 3. Lawful Basis for Processing

We rely on one or more of the following lawful bases under UK GDPR / Data Protection Act 2018:

- **Performance of a contract** (e.g., employment or engagement contract).
- **Compliance with a legal obligation** (e.g., safeguarding, tax, health and safety).
- **Legitimate interests** pursued by the company or school (e.g., ensuring safe operations, safeguarding, and effective management).
- **Consent** where explicitly provided and applicable.

#### 4. Categories of Personal Data Processed

We may process the following personal data:

- Identification and contact details (name, address, email, phone).
- Employment records (contracts, payroll, performance reviews).
- Safeguarding, disciplinary, grievance, and compliance records.
- Training records, qualifications, and professional development information.
- Health and medical information relevant to your role.
- IT and system usage data, for security and operational purposes.

#### 5. Recipients and Sharing of Personal Data

Your personal data may be shared with:

- Internal staff on a strict need-to-know basis (HR, payroll, safeguarding leads, management).
- External service providers such as accountants, HR advisors, Health and Safety advisors and other legal advisors.
- Regulatory, safeguarding, and statutory bodies, as required by law.
- Local safeguarding partners and multi-agency teams, in accordance with statutory safeguarding guidance.

**Transfers outside the UK/EEA:** We do not transfer personal data outside the UK or EEA. If this changes, appropriate legal safeguards will be implemented.

#### 6. Data Retention

We retain your personal data only as long as necessary to fulfil employment, legal, and safeguarding obligations. Typical retention periods include:

- Employment records: 6 years after employment ends.
- Safeguarding records: retained in line with statutory guidance and best practice.
- Other data no longer required is securely deleted or anonymised.

#### 7. Confidentiality & Safeguarding

All personal data is handled securely, with access restricted to authorised personnel. Safeguarding obligations take precedence over routine disclosure. Information is only shared lawfully and when necessary to protect children, young people, or staff.

#### 8. Your Rights Under UK GDPR

As a staff member, you have the right to:

- **Access your personal data** (submit a Data Subject Access Request, DSAR).

- **Request correction** of inaccurate or incomplete data.
- **Request erasure** in certain circumstances.
- **Request restriction of processing.**
- **Object to processing** based on legitimate interests.
- **Request data portability**, where applicable.
- **Withdraw consent** where processing relies on consent.
- **Lodge a complaint** with the ICO if you believe your data is not handled properly.

To exercise your rights or for data protection queries, contact:  
info@charlottelowepsychologicalservices.co.uk]

## 9. Changes to This Notice

This Privacy Notice may be updated periodically to reflect changes in legal requirements or organisational practices. The latest version will always be published internally and on our website. Staff will be informed of significant changes via email or staff meetings.