

## **ST BARTHOLOMEW'S SCHOOL**

### **Staff Privacy Notice**

**St Bartholomew's School processes personal data, including sensitive personal data, relating to you in the course of your employment or engagement with the school. For these purposes, we (the school) will act as the Data Controller, pursuant to the General Data Protection Regulations (GDPR). This privacy notice also covers information held relating to governors and volunteers. We are committed to protecting your personal information and your rights in line with the UK privacy legislation. This notice explains how and why we collect personal information about you and what we do with that information.**

#### **1. How we collect personal information about you**

We may collect personal information from you when you apply for a role, and during our interactions with you during and after your employment or other engagement with us.

We gather this information directly from you in the course of school-related activities. These may include, but not be limited to data collected through:

- The application, recruitment and safer recruitment process;
- Letters, school telephones including school mobiles and voicemail, as well as other school communications;
- Email and instant messaging systems;
- Intranet and internet facilities;
- Computer networks and connections;
- Biometric recognition data to access cashless catering and building entry and departure;
- CCTV and access control systems.

Occasionally, we obtain information about you from third party organisations such as recruitment agencies, former employers and the DBS.

#### **2. What personal information do we process about you?**

We may process your personal information including:

- Your employment application, address, qualifications, references and performance information;
- Personal contact details such as name, address, personal email address;
- Proof of identity, such as driving licence and/or passport;
- Contract information, such as start dates, roles, salary and benefits information as well as terms of engagement;
- Employment details, such as employee or teacher number, national insurance number and bank and payroll details;
- Special categories of data of more 'sensitive' personal information, such as race and ethnicity, health conditions and other health information, trade union membership, and information about criminal convictions and offences;
- Employment information for health and safety and security reasons – but where necessary, we comply with an additional condition for this processing, such as consent;
- Employment records, such as absence information (e.g. work, holiday and sickness records) and disciplinary and grievance information;
- Information obtained through electronic means such as your use of our information and communication systems, swipe card records, computer and telephone records and CCTV;

- Details of others such as 'next of kin', as provided by you – this may be the contact details of a close relative or friend, or your solicitor or other agent/s.

Whilst most of the information you provide to us is mandatory, some of it is provided to us on a voluntary basis so we will always inform you if the information must be provided or where you have a choice.

### **3. Why do we process your personal information?**

We only process your personal information where it is fair and lawful to do so. The legal grounds include:

- Legitimate interests, such as employee monitoring, managing performance or in the case of a disciplinary;
- To perform our obligations under our contract with you – for example, for payroll administration;
- To comply with a legal obligation – for example, to disclose information to the local authority or the police, or for health & safety purposes;
- When in someone's vital interests – such as preventing someone being seriously harmed;
- With your consent – for example, as part of the recruitment process or for use in biometrics.

In addition, we comply with an additional condition for the processing of 'special' categories of data – such as where information is needed to provide for any medical purposes, for the protection of the vital interests of a person, for legal claims. This is typically based on your explicit consent, but this can be withdrawn at any time.

If we need to use your personal information for a different, unrelated purpose, we will notify you and will explain the legal basis which allows us to do so.

For information on the conditions for processing, please contact the Data Protection Officer: [DPO@stbarts.co.uk](mailto:DPO@stbarts.co.uk)

### **4. Who do we share this information with?**

We may share your personal information with third party organisations.

This includes third parties who act for us – for example, our payroll and benefits providers and our Data archiving company. Where we share your information, it is always carried out under our instructions as detailed in a contract, or as required by law, and is never for any marketing approaches. We will ensure that all third parties who process your personal data are bound by a confidentiality obligation so that they store the data securely and delete it when it is no longer needed, in line with GDPR

We also share information with:

- Regulatory bodies, such as the Department for Education (DfE) and the Education & Skills Funding Agency (ESFA) for educational, funding and workforce monitoring purposes;
- HMRC;
- The police, if we believe a crime may have taken place;
- Our legal advisors, for the purposes of obtaining legal advice;
- Consultants, experts or other advisors, to assist the School in fulfilling its obligations and to help run the School effectively;

- Our insurance company, in the case of a serious incident at the School;
- Others, in the case of an emergency;
- West Berkshire Council who maintain and support the School's SIMS database.

But we never share your information for marketing purposes.

## 5. Security

We understand the importance of protecting your privacy and we will ensure your personal information is safeguarded and held securely in accordance with our obligations under the Data Protection legislation. Appropriate technical and organisational measures have been implemented to ensure personal information is protected and to prevent your personal data from being lost, used, accessed in an unauthorised way, altered or disclosed. We also limit access to your personal information to those employees, contractors and other third parties who need to have access to it. And, we have procedures to deal with any potential data security breaches.

Details of these security measures are available (in our Information Security Policy) upon request from the Data Protection Officer: [DPO@stbarts.co.uk](mailto:DPO@stbarts.co.uk) or via the intranet / internal network

## 6. Retaining your personal information

Data will be retained in our records for no longer than is necessary to fulfil the purposes we collected it for and in line with the statutory guidance.

Details of retention periods are available in our Records and Data Retention Policy, which is available on request from : [DPO@stbarts.co.uk](mailto:DPO@stbarts.co.uk) or via the intranet / internal network

## 7. Your Rights and requesting information to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the School Data Protection Officer : [DPO@stbarts.co.uk](mailto:DPO@stbarts.co.uk)

You may also have the right to

- Ask us to correct your information if it is incorrect;
- Ask us to delete the information that we hold about you in certain circumstances, for example, where we no longer need the information;
- Ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer;
- Restrict certain processing of your information, for example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.

If you wish to discuss these rights, to make any changes to the personal information we process about you, or, if have a concern about the way we are collecting or using your personal data, please speak to the School's DPO.

If you consider that our processing of your personal information infringes the Data Protection legislation, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues <https://ico.org.uk/concerns/>

25 May 2018