



DANESHILL SCHOOL

PRIVACY NOTICE - STAFF

**Reviewed Sept 2022
Next review date: Sept 2023**

General Statement

Under data protection law, individuals have a right to be informed about how the School uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **current, past and prospective staff, governors, peripatetic teachers contractors and volunteers** ("staff"), regardless of whether it is in paper or electronic format. This **Privacy Notice** also applies in addition to the School's other relevant terms and conditions and policies.

This Notice applies to the whole School.

Data Controller

We, Daneshill School ("the School"), are the 'Data Controller' for the purposes of data protection law.

The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about staff includes, but is not restricted to:

- Personal details such as home address, contact details, gender, date of birth
- Next of kin and emergency contact details
- Recruitment information, including copies of right to work documentation, references, pre-employment checks and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Staff performance including Personal Development Records, pay award applications, lesson observations, disciplinary and/or grievance procedure outcomes
- Salary, annual leave, pension and other benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Copy of driving licence
- Images of pupils and staff (and occasionally other individuals) engaging in School activities;
- Data about your use of the School's information and communications system

We may also collect, store and use information about you that falls into "**special categories**" of more sensitive personal data. This includes information about health, details of any illnesses, allergies or other medical conditions, accidents, occupational health record, health monitoring and sickness leave records;

We may also hold data about staff that we have received from other organisations, including other Schools, local authorities and the Department for Education.

Why We Use this Data

We use this data to:

- Enable you to be paid

- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Support effective performance management
- Allow better financial modelling and planning
- Improve the management of workforce data across the sector
- Provide appropriate pastoral care to staff
- Communicate with former staff
- Monitor staff email communications and internet use for the purpose of ensuring compliance with and strictly in accordance with the School's Child Protection Policy, IT Policy and any other related policies
- Where appropriate, promote the School to prospective pupils (including through the School's prospectus, website and social media applications)
- Other reasonable purposes relating to the operation of the School including to obtain appropriate professional advice and insurance for the School

Our Legal Basis for Using This Data

We process personal data in order to fulfil our **contractual obligations** as an employer and to promote the objects and interests of the School, facilitate the efficient operation of the School and ensure that all relevant **legal obligations** of the School are complied with.

Other uses of personal data will be made in accordance with the School's **legitimate interests**, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data.

In addition, the School will on occasion need to process **special category personal data** (concerning health) or from time to time by explicit **consent** where required. These reasons will include:

- To safeguard staff and pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident.
- As part of any School or external complaints, disciplinary or investigation process.
- For legal and regulatory purposes (for example child protection and health and safety) and to comply with its legal obligations and duties of care.

Collecting this data

We will only collect personal data for specified, explicit and legitimate reasons. If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned and obtain consent before we do so.

How we store this data

We keep personal data about staff while they are employed by the School electronically on the School's information management systems, the School's network or manually in employment files. We may also keep it beyond their period of employment at the School if this is necessary in order to comply with our legal obligations and legitimate interests. Our 'Data Protection – Good Practice Guide' sets out how long we keep information about staff. A copy is available on request from the Bursar.

The School will take appropriate technical and organisational steps to ensure the security of

personal data about individuals, including policies around use of technology and devices, and access to School systems. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

Data sharing

For the most part, personal data collected by the School will remain within the School and will be processed by appropriate members of staff only in accordance with the School's Data Protection Policy.

We will not normally share personal data of the staff with anyone else, but may do so where:

- There is an issue that puts the safety of a pupil or our staff at risk
- We need to liaise with other agencies
 - to enable the relevant authorities to monitor the School's performance i.e. Independent Schools Inspectorate
 - to compile statistical information (normally used on an anonymous basis)
 - to safeguard staff welfare and provide appropriate pastoral (and where relevant, medical or occupational health) care
 - where necessary in connection with learning and extra-curricular activities undertaken by pupils e.g. educational visits, residential trip providers
 - to obtain appropriate professional advice and insurance for the School
 - where a reference or other information about a member of staff or former member of staff is requested by another educational establishment or employer to whom they have applied
 - to complete payroll functions
 - to undertake financial transactions
- Our suppliers or contractors need data to enable us to provide services to our staff and pupils – for example, IT support, catering

We will also share personal data with law enforcement and government bodies where we are legally required to do so, including for:

- The prevention or detection of crime and/or fraud
- The apprehension or prosecution of offenders
- In connection with legal proceedings
- Where the disclosure is required to satisfy our safeguarding obligations
- Research and statistical purposes, as long as personal data is sufficiently anonymised, or consent has been provided

We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our pupils or staff.

We will only transfer personal data to a country or territory outside the European Economic Area if we are satisfied the third party(s) involved will only process the data in accordance with data protection law.

Staff rights regarding personal data

Individuals have a right to make a **'Subject Access Request'** to gain access to personal information that the School holds about them. This includes:

- Confirmation that their personal data is being processed
- Access to a copy of the data
- The purposes of the data processing
- The categories of personal data concerned
- Who the data has been, or will be, shared with
- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period
- The source of the data, if not the individual
- Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual

If you would like to make a request, please contact the Bursar.

Other Rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- To request rectification of any data that is inaccurate or incomplete
- To have their personal data erased and to prevent further processing if:
 - It is no longer required for the purposes for which it was collected
 - Consent is withdrawn
 - There is an opposition to the processing and no superseding legitimate interest
 - The personal data is being unlawfully processed
 - The personal data must be removed in order to comply with a legal obligation
- Request a restriction of further processing of personal data
- Object to processing on specific grounds

To exercise any of these rights, please contact the Bursar.

Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance. To make a complaint, please contact the Bursar.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us

For further information, see our Data Protection Policy. If you have any questions, please contact the Bursar: