



How We Use Your Information

Privacy Notice for Staff

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| Title | Privacy Notice for Staff | |
| Prepared By | Karen Tyler, Data Manager | Date: May 2018 |
| Last Checked By | Clare Murray, IT Governor | Date: September 2022 |
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| V01.01 | January 2020 | Approved by Governors |
| V01.02 | September 2020 | Added further examples of reasons for sharing data |
| V01.03 | September 2022 | Updated for new sign in system |
| V01.04 | September 2023 | Information about CCTV and biometric data added |

“In Christ we flourish”

Introduction

This notice is for all St Gregory's staff and explains how and why we collect personal data pertaining to staff and what we do with that data. This notice does not form part of your contract of employment and the school may amend this notice from time to time.

St Gregory's, Bath (the school) is a Data Controller for the purposes of the General Data Protection Regulation (GDPR). The school has appointed Mrs Karen Tyler as its Data Protection Officer (DPO). You can discuss this notice with her if you have any questions.

What is personal data?

Your personal data is information that identifies you as an individual. The school holds and processes personal data about current and former members of staff including temporary workers, associates, invigilators, etc. The personal data we hold about staff may include:

- **Their Personal Information** such as contact details (address, telephone numbers, email address), date of birth, gender, age, national insurance number, documentation proving their right to work in the UK, etc.
- **Information about their job and contract of employment** such as their education, qualifications and professional achievements, role/job title, start date, hours of work, salary information and payments, benefits and related financial information, periods of leave taken, employment history, etc.
- **Information about their job performance** including information pertaining to assessments of performance, appraisals and performance reviews, training undertaken, performance improvement plans, promotion, details of any disciplinary or grievance procedures in which they have been involved, skills, achievements, etc.
- **Information about their family, lifestyle and social circumstances.** In certain circumstances we will hold limited information about a member of staff's spouse, partner or other individuals. This is collected, for example, where they are named as an emergency contact or where shared parental leave is requested.
- **Information about dates and times** staff have signed in or out of the school site.
- **CCTV images** as we use CCTV to make sure the school site is kept safe for students, staff and visitors.

The school may also process information about staff which is classified as 'special category' data, which requires additional protections. For example, we may collect the following special category data:

- Details of periods of leave taken including sickness absences and family leave;
- Information relating to their health (whether physical or mental) or disability information;
- Information about nationality and ethnic origin;
- Information about religion or beliefs;
- Biometric data (where staff consent to scanning their thumbprint in order to make purchases from Sodexo);
- Trade Union affiliation where applicable;
- Details of criminal convictions;
- Data pertaining to 'fitness to practice' matters.

These lists are not exhaustive.

How and why do we collect personal data?

The school may acquire personal data in a number of ways. Much of it will be provided by you yourself. For example, you will provide the school with personal data about yourself during the recruitment process. When you enter into a contract of employment you also consent to the school processing data about you as necessary for the proper administration of the employment relationship, both during and after your employment.

Personal data will also be created internally by the school subsequently during the employment. For example, when you share personal information during the course of your employment.

It may also be acquired from outside of the school, ie from other schools, from public authorities, in connection with references, from the Disclosure and Barring Service or from providers of our occupational health service, etc.

We collect this information primarily to ensure that we provide a safe and secure work/teaching environment, to properly manage the employment relationship, to provide training and support, to protect and promote the school's interests and objectives, to facilitate our administration, to ensure that all relevant legal obligations of the school are complied with and for other related legitimate purposes.

Some examples of why we might routinely need to use your personal data are:

- Holding contact details in order to let you know if the school is closed during poor weather conditions;
- Keeping information about physical or mental health conditions in order to monitor sick leave and take decisions regarding fitness for work;
- Keeping information about ethnicity and religion in accordance with the school's equal opportunities policy in order to monitor compliance with equal opportunities legislation;
- Using CCTV recordings for the purposes of crime prevention and investigation and also in connection with our obligation to safeguard the welfare of students, staff and visitors to the site. CCTV recordings may be disclosed to third parties such as the police but only where such disclosure is in accordance with data protection legislation;
- Using photographs and video recordings of staff for marketing and promotion purposes, including in school publications, in social media and on the website. The school may also allow external publication of media where appropriate (for example, in a local newspaper). The school may also make recordings for teaching purposes, for example, recording a drama lesson to provide feedback to students;
- Publishing of names and contact details of staff in school publications and on the school's internal and external websites.
- Using an Internet filtering service (SWGfL) and using Impero to monitor Internet usage and keywords and phrases on all school machines.
- Keeping a record of staff members who are currently on the site.

St Gregory's may also use personal data pertaining to staff for other purposes where data protection legislation allows and where providing an explanation would not be appropriate. For example, this includes sharing personal data about staff with the relevant statutory agencies investigating allegations of misconduct or for the prevention and investigation of crime and the prosecution of offenders.

What is our lawful basis for using this information?

Under the current Data Protection legislation we collect and use most staff data to carry out our legal responsibilities as your employer.

In other instances we may ask for consent to process your data (i.e. when its use is optional). On those occasions consent can be withdrawn at any time. We will make this clear when we ask for consent.

Who do we share the information with?

We do not share any personal data pertaining to staff with any other organisation without your permission, except where the law requires it or when we have a good reason to do so. Here are some examples of when we may need to share data:

- With government departments and agencies where we have a statutory obligation to provide information (i.e. to HMRC);
- With the system provider that administers our payroll or with our pension providers;
- With the Disclosure and Barring Service where we need to make a criminal records check;
- On occasion with the police and other law enforcement agencies;
- On occasion with appointed external auditors, School Improvement Partners or those inspecting the school (i.e. OFSTED and/or the Diocese);
- On occasion with our occupational health service provider to ensure you are fit for work;
- In accordance with our legal obligations, with local authorities and the Department for Education, for example, where we have any safeguarding concerns;
- With the relevant statutory agencies investigating allegations of misconduct or for the prevention and investigation of crime and the prosecution of crimes;
- We may engage contractors to provide services for the school from time to time, i.e. to facilitate the effective administration of our systems, and this may require them to have access to staff's personal data. If so, we will ensure that they are contractually bound to respect confidentiality and comply with all relevant data protection requirements;
- With our governors, (for example if they are involved in any process, procedure or appeal which involves the staff member);
- If you are participating in a school trip or an external event, we may need to share some of your information (i.e. contact details in case of emergency) with the event organiser/host organisation or the tour operator or accommodation provider;
- If a member of staff plans to leave us to work elsewhere we may use some of the information we hold about them in order to provide a reference.

This list is not exhaustive.

How long do we keep this information for?

St Gregory's has a Records Management and Retention Policy which sets out how long we will keep your personal information for. We only retain your information for as long as we need to. The retention period depends on the type of information held. In exceptional circumstances we may keep your information for a longer time than usual or share it more widely than we would normally.

What decisions can you make about your information?

- If information held about you is incorrect you can ask us to correct it. If you would like us to change or update the information we hold about you please speak to the Data Protection Officer.

- You have the right to prevent processing that is likely to cause unwarranted substantial damage or distress to you or anyone else.
- You can object to any decision that significantly affects you from being taken solely by a computer or other automated process.
- You have the right to request access to the information we hold about you. To make a request for any of your personal information, please contact the Data Protection Officer by emailing dpo@st-gregorys.org.uk or phoning 01225 832873.
- If you have a concern about the way we are collecting or using your personal information, please raise your concern with us in the first instance. Alternatively you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns>.