



# ***BRADSTOW SCHOOL***

## **POLICY**

### **Privacy Notice for School Staff**

June 2018

To be reviewed June 2019

# How We Use Your Information

## Privacy Notice for Staff

### 1. Introduction

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 individuals we employ, or otherwise engage, to work at our school.

We, Bradstow School, are the 'data controller' for the purposes of data protection law.

If you have any questions/concerns about this notice please talk to the School Business Manager.

### 2. What is "personal data"?

Personal data is information that the School holds about you and which identifies you.

This includes information such as your date of birth and address as well as things like ethnicity and National insurance details. Any CCTV, photos and video recordings of you are also personal information.

### 3. The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references 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
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence
- Photographs
- CCTV footage
- Data about your use of the school's information and communications systems

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Health, including any medical conditions, and sickness records

#### 4. Why we use this data

The purpose of processing this data is to help us run the school, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards children/young people
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable equalities monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body

Here are some further examples:

- We use CCTV to help ensure the safety of children & young people and help prevent crime. CCTV is not used in internal buildings.
- We may need to share information with the police or our legal advisers if something goes wrong or to help with an inquiry.
- Occasionally we may use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We might need to share your information with them if this is relevant to their work.
- We may use photographs or videos of you for our website or prospectus to show prospective children & young people what we do here and to advertise the school. We may continue to use these photographs and videos after you have left the school.
- We sometimes use contractors to handle personal information on our behalf. The following are examples:

- IT consultants who might access information about you when checking the security of our IT network; and

- we use third party "cloud computing" services to store some information in a secure way rather than the information being stored on hard drives located on the school site.

#### 5. Our legal basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation

- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

## 6. Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

## 7. How we store this data

Personal data is stored in line with our data protection policy.

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

Your data is also stored electronically on our SIMS.net computer database and within various folders and databases on a secure server drive.

CCTV recordings of the outside areas are stored on digital video recorders which are situated in secured/locked locations.

### Data Retention

The school keeps your personal data until 7 years after you have left. [This is currently not the case for your data kept on our SIMS database, but in the forthcoming summer update will enable us to delete your data records, as appropriate.]

We use guidance from the [Information and Records Management Society's toolkit for schools](#) as a guide to our data retention policies.

### Data security measures

Access to all this data is restricted by secure password and only accessible by a very limited number of staff, as appropriate to their job function.

On archiving your records these are stored off-site in a secure, locked container. Both these storage areas are locked and only accessible by a very limited number of staff, as appropriate to their role.

## 8. Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about head teacher performance and staff dismissals
- The Department for Education
- Your family or representatives
- Our regulator : Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies
- Employment and recruitment agencies
- We may share some information with our insurance company to make sure that we have the insurance cover that we need.

We share some information with:

- The London Grid for Learning under our contract to provide staff email and access to learning resources.
- SAM (Staff Absence Management) : to help the school manage staff sickness/absence.
- NHS (Occupational Health, The Beacon, etc) : for helping to maintain staff welfare.
- Employment agencies : To be able to have agency workers working for Bradstow School.
- Trade Unions : To enable the union representative to support and advocate for staff.
- Beneden : To enable staff to enjoy the benefits of private healthcare.
- Educational resources, e.g. Twinkl, Purple Mash, etc : For educational resources to be accessible to staff.
- Children & young people assessment software, e.g. Bsquared : To enable effective assessments of children & young people.
- Staff training products, e.g. Kwango, Child Protection Company : To provide essential staff training.

### **Transferring data internationally**

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

## 9. Your rights

### How to access personal information we hold about you

Individuals have a right to make a **'subject access request (SAR)'** to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact the School Business Manager.

### Your other rights regarding your data

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

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact the School Business Manager (see contact details below).

## 10. 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 our data protection officer.

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

## 11. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact:

In the first instance: School Business Manager | Tel: 01843-862123 | [info@bradstow.wandsworth.sch.uk](mailto:info@bradstow.wandsworth.sch.uk)

Alternatively our **Data Protection Officer**: Mr Gary Hipple | [ghipple@wandsworth.gov.uk](mailto:ghipple@wandsworth.gov.uk)

This notice is based on the [Department for Education's model privacy notice](#) for pupils, amended for parents and to reflect the way we use data in this school.

*For internal use only:*

Policy last reviewed: June 2018

SLT responsibility: School Business Manager

Policy reviewed by: Mike Kemlo

Approved by Board of Governors: 25 June 2018