



# Privacy notice - staff

**Review cycle:** Every 3 years

**Approval level:** Headteacher

**Tier:** 3

**Staff responsible for review:** Assistant Headteacher

**Approved:** 1/2/23

**Date of next review:** 1/2/26

## **How we use information about employees**

To run the school and help learning and achievement for our students, we collect and use information about employees. The member of staff responsible for day to day data protection issues is referred to as the General Data Protection Regulation (GDPR) Ambassador. The Data Protection Officer (DPO) acts primarily in an advisory capacity.

Much of the information we collect is classed as 'personal data' and our use of it is covered by a set of rules called the General Data Protection Regulation (GDPR). This document tells you more about:

- *The information we collect.*
- *What we use the information for.*
- *How your information is stored and how long we keep it.*
- *What rights you have to the information.*

## **What Information do we collect and use about employees?**

We collect many different categories of information, for example:

- Personal details.
- Contact details.
- Banking details.
- Taxation details.
- Pension details.
- Job application details.
- Selection and interview records.
- References received.
- Identity verification records.
- Performance assessment details.
- Information for improving performance.
- Annual leave records.
- Records of communications.
- Photographs of you or images on CCTV.
- Information to identify you in the school.
- Records of transactions.
- Information about the use of school IT systems.
- Information about consultation with other professionals.

We also are required to collect and use information that is given additional protection under the GDPR, for example;

- Demographic information required for monitoring equal opportunities.
- Information about health conditions and medical appointments.

## **Why we collect and use this information**

We use the information for some, or all, of the, reasons below;

- To enable you to work for us.

- To support you in teaching and learning.
- To maintain a safe environment for our pupils.
- To provide appropriate pastoral care for our students.
- To enable you to take part in appropriate training and professional development.
- To help you to deliver the best support of our students and your colleagues.
- To enable you to pay for meals.
- To comply with our legal obligations to share information.
- To ensure your health and safety.
- To keep you up to date with news.

### **The legal basis for using this information**

Depending on the purpose, our use of your information will be legal due to one of the following:

- Informed consent given by you [Article 6(1)(a)].
  - For example: The use of banking information in our payment service.
- To meet the terms of a contract.
  - For example: Recording the amount of annual leave you have taken.
- To meet a legal requirement [Article 6(1)(c)].
  - For example: Providing information to HMRC.
- To protect the vital interests of you or someone else [Article 6(1)(d)].
  - For example: Giving your contact details to emergency services.
- Delivering a public task [Article 6(1)(b)].
  - For example: Keeping records of meeting with parents.

Where we use special category personal data we process this under the following exemptions from Section 9 of GDPR:

- Explicit consent given by you [Article 9(2)(a)].
- For example: The use of biometric information to identify you for our catering system.
- Information used in the field of employment [Article 9(2)(b)].
- For example: Using information about ethnic origin for equality monitoring purposes.
- To protect the vital interests of you or someone else [Article 9(2)(c)].
- For example: providing details of any medical conditions you have in the event of an emergency.
- For substantial public interest [Article 9(2)(g)].
- For example: Using information about your health to ensure a safe working environment.

### **Storing your personal data**

Some of the personal data that we collect, and use, is added to your HR file. Other data, depending on its purpose will be kept in other systems or in manual files. We use email to enable authorised users to transfer information to one another.

Some personal data is kept for different lengths of time. For example;

- Your HR file is kept for 6 years after the date you leave employment.
- Annual appraisals are kept for the current year and then for 5 years.
- Records of any accident you have at work are kept for 12 years after the incident.

If you'd like to know how long we keep a specific piece of personal data, please contact the GDPR Ambassador whose details can be found at the end of this Privacy Notice.

### **Sharing your personal data**

At times we will share your personal data with other organisations and people. We will only do this when we are legally required to do so, when our policies allow us to do so or when you have given your consent.

Examples of people we may share personal data with are:

- *Family, associates and representatives of the person whose personal data we are processing who are authorised to receive the data.*
- *HMRC.*
- *The Department for Education.*
- *Healthcare, social and welfare organisations.*
- *Police forces and Courts.*
- *Voluntary and charitable organisations.*
- *Our suppliers and service providers.*

Where we share your personal data with someone who is a supplier or service provider we have taken steps to ensure that they treat your personal data in a way that meets the requirements of the GDPR.

### **Your rights to your personal data**

You have rights relating to the personal data that we collect and use. Your rights are different depending on the legal basis of the information we are using. If we are using your personal data based on your consent, you can withdraw that consent and we will stop using that personal data. Withdrawing your consent will need to be recorded in writing, please contact the GDPR Ambassador.

#### **The right to be informed:**

If you ask us, we must tell you if we are collecting or using your personal data. If we are collecting or using your personal data, you have:

#### **The right of access to your personal data**

You have the right to view the personal data that we hold about you, to receive a copy of the data and to be given more information about the data including any transfer to countries which do not fall under the requirements of the GDPR. Some information we hold cannot be accessed in this way. If you ask for information that is not available, there may be other ways of accessing it and we can help you. To have access to your personal data we will need to collect details of what you want and in the first instance, you can contact the GDPR Ambassador whose details can

be found at the end of this Privacy Notice. You will also need to supply us with standard information to verify your identity.

### **Other rights**

You also have rights to ask us to correct inaccurate personal data, to ask us to stop using it or to object to us using it. For some data you may have the right to ask us to erase it, or to provide it in an electronic format that you can give to someone else. For some personal data, if we are subjecting it to automated decision making then you have the right to object to this and request that a person is involved in this process. You will be given full details of these rights if you request access to your personal data or you can ask the GDPR Ambassador.

### **Who to contact**

School is required to have someone called a Data Protection Officer or DPO. The DPO advises the school about issues to do with data protection, but can also help you, if you have a problem.

**Our Data Protection Officer is:** Craig Stilwell

Data Protection Officer Details: Judicium Consulting Ltd, 72 Cannon Street, London, EC4N 6AE

Data Protection Officer Email: [dataservices@judicium.com](mailto:dataservices@judicium.com).

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/> or call 0303 123 1113.

### **GDPR Ambassador**

In school we have a GDPR Ambassador who you can contact should you require. Our GDPR Ambassador is:

Alison Mansfield

Todmorden High School, Ewood Lane, Todmorden, OL14 7DG

[a.mansfield@todhigh.co.uk](mailto:a.mansfield@todhigh.co.uk)