



PRIVACY NOTICE FOR STAFF

The Priory School is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your work relationship with us, in accordance with the General Data Protection Regulation (GDPR). It applies to all current and former employees, workers and contractors.

The Priory School is the “data controller” for the purposes of data protection law.

We collect and process your personal data to assist in the running of the school and to manage employment relationships of those who are engaged to work or perform services for us.

Data Protection Principles

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

The categories of information that we process

Personal data that we may collect, use, store and share (where appropriate) about you includes;

- Contact details;
- Date of birth, marital status and gender;
- Next of kin and emergency contact information;
- Recruitment information including references, proof of right to work documentation, application forms and or letters of interest, copies of passport and immigration information;
- Employment contract information such as start dates, hours worked, post and roles;
- Education and training details;
- Bank account details, salary and benefits, payroll records, tax status information, national insurance number, pension and benefits information;
- Information on conduct and/or other disciplinary procedures;
- Appraisals and performance reviews;
- Criminal record information (as required by law);
- Absence data; and
- Images of staff captured by the School’s CCTV system.

Sensitive personal information (GDPR Article 9 “Special Category Data”) requires higher levels of protection and further justification for collecting, storing and using. This type of information includes:

- Ethnicity, religious beliefs, political opinions;
- Health including any medical conditions and sickness records; and
- Trade Union Membership

We may process this data in the following circumstances (this is not exhaustive):

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations in line with our data protection policy; and
- Where it is needed in the public interest, such as for equal opportunities monitoring (or in relation to our pension scheme)

How we collect personal data

We collect personal data in a variety of ways. Examples include:

- Application forms/CVs;
- Passports or other identity documents;
- Disclosure and Barring Service (DBS) checks;
- Forms completed by you at the start of your employment;
- Correspondence between you and the school;
- Interviews, meetings or assessments; and
- Fitness for work checks.

Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with GDPR, we will inform you at the point of collection whether you are required to provide certain information to us or if you have a choice.

How we use your information

We will only use your personal information when the law allows us to. Most commonly, we will use your information in the following circumstances: -

- Where we need to perform the contract we have entered into with you;
- Where we need to comply with a legal obligation (such as health and safety legislation, under statutory codes of practice and employment protection legislation);
- Where it is needed in the public interest or for official purposes;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests, rights and freedoms do not over rise those interests.

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. Please note that we may process your information without your knowledge or consent, where this is require or permitted by law.

The situations in which we will process your personal information are listed below: -

- To determine recruitment and selection decisions on prospective employees;
- In order to carry out effective performance of the employees contract of employment and to maintain employment records;
- To comply with regulatory requirements and good employment practice;
- To carry out vetting and screening of applicants and current staff in accordance with regulatory and legislative requirements;

- Enable the development of a comprehensive picture of the workforce and how it is deployed and managed;
- To enable management and planning of the workforce, including accounting and auditing;
- Personnel management including retention, sickness and attendance;
- Performance reviews, managing performance and determining performance requirements;
- In order to manage internal policy and procedure;
- Human resources administration including pensions, payroll and benefits;
- To determine qualifications for a particular job or task, including decisions about promotions;
- Evidence for possible disciplinary or grievance processes;
- Complying with legal obligations;
- To monitor and manage staff access to our systems and facilities in order to protect our networks, the personal data of our employees and for the purposes of safeguarding;
- To monitor and protect the security of our network and information, including preventing unauthorised access to our computer network and communications systems and preventing malicious software distribution;
- Education, training and development activities;
- To monitor compliance with equal opportunities legislation;
- To answer questions from insurers in respect of any insurance policies which relate to you;
- Determinations about continued employment or engagement;
- Arrangements for the termination of the working relationship;
- Dealing with post-termination arrangements;
- Health and safety obligations;
- Prevention and detection of fraud or other criminal offences; and
- To defend the School in respect of any investigation or court proceedings and to comply with any court or tribunal order for disclosure.

Storing workforce Information

We will keep your personal information whilst you are an employee. We may also keep it after you have left the school where we are required to by law. We will only retain the data we collect for as long as necessary to satisfy the purpose for which it has been collected in accordance with regulations published by the IRMS (Information and Records Management Society).

Who do we share your data with?

We are routinely required to share information about school employees with the Department of Education (DfE).

We may need to share your data with third parties, including third party service providers where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. Information will be provided to those agencies securely or anonymised where possible. The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.

We may be required to transfer your personal information with an organisation outside the EU. If we do, we will protect your data by following data protection law.

Criminal Convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where it is necessary to carry out our legal obligations. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

Where appropriate we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of working for us.

Automated Decision Making

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

Security

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

Third parties will only process your personal information on our instructions and where they have agreed to treat information confidentially and to keep it secure.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Rights of Access, Correction, Erasure and Restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Under certain circumstances by law you have the right to:

- Access your personal information (commonly known as a “subject access request”). This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively we may refuse to comply with the request in such circumstances;
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected;
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it;
- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it;

- To object to processing in certain circumstances (for example for direct marketing purposes); and
- To transfer your personal information to another party.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the School Business Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

How to Raise a Concern

We hope that we can resolve any query you raise about our use of your information in the first instance.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by us, then you can contact the DPO on the details below: -

Data Protection Officer Name: Supplied by Turn It On

Data Protection Officer Details: Turn It On 01865 597620

Data Protection Officer Email: office@turniton.co.uk

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues.

Changes to This Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.