



## **Tiffin School Privacy Notice for Staff, Consultants and Volunteers**

This privacy notice advises staff and volunteers of the school's data protection responsibilities on the collection, storage and use of personal data about individuals we employ, or otherwise engage, to work at Tiffin School (the School).

The School is committed to being transparent about how we collect and use personal data and to meeting our data protection obligations.

The School is required to explain how and why we collect personal data and what we do with that information. This privacy notice will also provide information as to what you can do about your personal information that is held and processed by us.

For the purposes of this privacy notice, 'Staff' includes, but is not limited to:

- Employees with a permanent, fixed-term, temporary or casual contract, including but not limited to:
  - Leisure Assistants
  - Foreign Language Assistants
  - Invigilators
- Self-employed service providers:
  - Peripatetic music teachers
  - Sports coaches
- Agency staff
- PGCE students
- Support Workers, e.g. Health Link Worker
- Contractors – where the school holds dates of and certificate numbers, and any disclosures made on individual Disclosure and Barring Service certificates
- Consultants

For the purposes of this privacy notice, 'Volunteer' includes, but is not limited to:

- Governors
- Members of the Academy Trust
- Parent Staff Association volunteers
- Friends of Tiffin Music volunteers

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

The Data Protection Officer is Mrs E. Barrett, Deputy Head teacher. She can be contacted at [ebarrett@tiffin.kingston.sch.uk](mailto:ebarrett@tiffin.kingston.sch.uk)

### **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 (name, address, email, telephone)
- Date of birth, marital status, gender
- Next of kin and emergency contact numbers

- Salary, pay progression, annual leave, pension and benefits information (e.g. maternity, paternity, sickness)
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation (passport, birth certificate, driving licence, permits, visas), 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
- DBS certificate numbers, dates and any disclosures made
- Performance information • Outcomes of any disciplinary and/or grievance procedures
- Absence information
- Photographs
- CCTV footage
- 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 (where applicable):
- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Health, including any medical conditions, and sickness records
- Disability, including any records for reasonable adjustments

### **Why we use this data**

The School processes this data for employment purposes to assist in the running of the School, including to:

- Enable you to be paid
- Manage the employment relationship of those who are engaged to work or perform services for the School
- Facilitate safe recruitment, as part of our safeguarding obligations towards students
- Support effective performance management of staff
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring in accordance with the Equality Act
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body
- Enable the development of a comprehensive picture of the workforce and how it is deployed

### **Our lawful 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:

- a) Fulfil a contract we have entered into with you
- b) Comply with a legal obligation
- c) Carry out a task in the public interest

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

- d) We need to protect the individual's vital interests (or someone else's interests).

Your consent is not required when the lawful basis for using your personal data is a), b), c) or d) above.

We may also use personal information about you where you have given the School consent to use it in a certain way, for example, use of a photo in a newsletter.

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 this data.

### **Collecting this information**

Whilst the majority of information the School collects 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.

The School collects information in a variety of ways, for example, through:

- Application forms, CVs or covering letters
- Your passport or other identity documents, such as your driving licence
- From third parties such as the DBS in carrying out safeguarding checks, references supplied by former employers
- Forms completed by you at the start of or during your employment or engagement with us
- Correspondence with you
- Interviews, meetings or other assessments

### **How we Store this Data**

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.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our Records Management Policy.

### **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:

- Other members of staff – in order for them to perform their roles, e.g. Senior Leadership Team, Governors, HR, your line manager.
- The Disclosure and Barring Service – to meet our legal obligations for safer recruitment
- Our Local Authority, (the Royal Borough of Kingston)) – to meet our legal obligations to share certain information, such as safeguarding concerns.
- The Department for Education (DfE) – to meet our legal obligations to share certain information, such as school workforce census, Governor and Member information (e.g. name, date of birth, term of office).
- Companies House – to meet our legal obligations to share certain Governor information when a Director of the Academy Trust is appointed.
- Ofsted – to enable them to meet their obligations when conducting an inspection
- Our auditors – to enable them to meet their obligations to conduct internal and external audits of the school's financial management system and accounts.
- Suppliers and service providers – to enable them to provide the service we have contracted them for, e.g. IT services provider, payroll agency, pension providers, occupational health services, ParentMail, photographer for staff photos on the School Management Information System, online appraisal system. Access to personal data will only be granted to a provider that has demonstrated compliance with the GDPR
- Insurance provider – we may need to share some information to ensure we maintain cover or to process any claims

- Health and social welfare organisations – we may need to share information about you with those who have responsibility for student welfare
- Professional advisers and consultants – we might need to share staff information in order to assist us in the running of the school, if this is relevant to their work
- Police forces, courts, tribunals – sometimes we need to share information with the police or our legal advisers to help with an inquiry, e.g. safeguarding issues or injuries
- Third-parties in the context of a TUPE transfer
- Professional bodies – to participate in their educational provision, e.g. SSAT, training providers

### **Transferring data internationally**

With cloud-based storage and some other services sometimes being supplied outside the UK, personal data can be sent to other jurisdictions.

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.

Our servers and storage systems are based in the EU or the European Economic Area (EEA) and we have ensured that appropriate safeguards are in place to protect your personal data.

### **Your 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.

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including 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 get in touch with our Data Protection Officer.

If you have a concern about the way we are collecting or using your personal data, please raise your concern with the School in the first instance by contacting our Data Protection Officer. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Reviewed: March 2020