

Staff Privacy Notice



Reviewed: DL July 2024

Next review by: September 2025

1. Introduction

- 1.1. The Godolphin and Latymer School Foundation is a Data Controller for the purposes of Data Protection Law¹, which means it determines how an individual's personal data is processed and for what purposes.
- 1.2. During the course of the School's activities the School will process personal information about staff. This privacy notice aims to explain how and why we collect personal data about you and what we do with that information. It applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form.
- 1.3. The Bursar, supported by the Assistant Bursar (Compliance), is responsible for data protection within the School. She will deal with any requests or enquiries regarding the School's uses of your personal data and endeavour to ensure that your personal data is processed in compliance with this notice and Data Protection Law. The Bursar and Assistant Bursar (Compliance), can both be contacted via email at finance@godolphinandlatymer.com.

2. Types of personal data processed by the School

- 2.1. **Personal data** is information that identifies you as an individual and relates to you. Examples of the personal data which the School may hold about you include:
 - Name, addresses, date of birth, telephone numbers, e-mail addresses and other contact details;
 - Bank details and other financial information regarding payment of your salary and administration regarding your pension;
 - Information about your health and welfare and contact details for your next of kin;
 - Biometric information (see more on this below);
 - References given or received by the School about you;
 - Correspondence with you;
 - Information gathered during the recruitment process such as information about your education and qualifications, professional achievements and suitability for the position applied for;
 - Information about criminal convictions and offences when it carries out Barred List and Disclosure and Barring Service (DBS) checks for school staff;
 - Information about your job performance. This includes information about skills, achievements, career progression and disciplinary related matters;
 - Other employment related information such as flexible working requests, maternity, paternity, adoption or parental leave requests, or requests for compassionate leave; and
 - Car details (if you use our car parking facilities);
 - Other information such as photographs, CCTV, video recordings, or expressions of opinion.
- 2.2. The School may acquire your personal data in a number of ways. For example:
 - you may provide the School with personal data about yourself, for example, during the recruitment or joining process;

¹ This includes the Data Protection Act 2018, the General Data Protection Regulation and any replacement legislation.

- personal data may be created internally by the School during the course of employment. An email from the Head to a member of staff thanking them for their contribution to a school event or correspondence with the Bursar regarding your pension plan would be examples of this and also the use of CCTV around the School; and
- personal data may be acquired from outside the school community such as from other schools, public authorities, public sources and in connection with references.

3. Why the School needs to process your personal data

- 3.1. In order to carry out its ordinary duties to staff, pupils and parents, the School will process a wide range of personal data about individuals (including current, past and prospective staff) as part of its daily operation.
- 3.2. Some of this activity the School will need to carry out in order to fulfil its legal rights, duties or obligations, including those under a contract with the individual to whom the personal data belongs.
- 3.3. Other uses of personal data will be made in accordance with the School's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.
- 3.4. The School expects that the following uses will fall within that category of its (or its community's) "**legitimate interests**":
 - To carry out HR, administrative and management functions and to enable the School to meet its legal obligations as an employer, for example to pay staff, to monitor performance and to provide references;
 - To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
 - To safeguard and promote the welfare of all staff and pupils, including the recording of any concerns that may not meet a statutory threshold but are reported to the School's Designated Safeguarding Lead in accordance with School safeguarding procedures;
 - To provide training and support to staff;
 - To filter and monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's Acceptable Use of ICT for Staff policy;
 - To make use of photographic images or video recordings of staff for teaching purposes or for marketing and promotion purposes including in School publications, on social media and on the School website.
 - For security purposes and to provide a safe and secure environment, including the use of CCTV in accordance with the school's CCTV policy and the use of biometric data for fire register purposes;
 - To carry out or cooperate with any internal or external complaints, disciplinary or investigation process;
 - To protect and promote the School's interests and objectives;
 - To maintain relationships with staff alumni and the school community, including direct marketing or fundraising activity; and
 - Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the school.
- 3.5. In addition, we will on occasion need to process **special category personal data** (concerning health or biometrics) or criminal records information (such as when carrying out DBS checks).

This is done in accordance with rights or duties imposed on us by law, including as regards safeguarding or employment, or from time to time by explicit consent where required. The reasons for processing this data include:

- In connection with your employment, for example DBS checks;
- In order to comply with legislation regarding vetting of school staff, to monitor sick leave and to take decisions regarding fitness for work;
- To register you on site for attendance and fire safety purposes and to enable you to make cashless purchases from the dining room, if applicable;
- For legal and regulatory purposes (for example child protection, public health and health and safety) and to comply with legal obligations and duties of care.

3.6. Examples of when we might seek your specific consent to use your personal data include:

- **Photographs and video recordings:** Most uses of photographs or video recordings as described above will not require your consent. However, if we consider that a proposed use is more privacy intrusive, we may ask for your consent before using a specific image or recording.
- **Medical information:** The Godolphin and Latymer School only runs an entirely voluntary scheme whereby information about a member of staff's medical condition/s, allergies and medication can be held in the Medical Centre (securely and confidentially) in the event that they are unable to give this to the emergency services in a medical emergency. As this is voluntary, your consent will be requested when you provide the data.
- **Biometric Data:** Although use of a fingerprint for fire register and cashless catering purposes is convenient for you, the objectives can also be achieved through use of a PIN number. We therefore ask for your consent to use your biometric data in this way and if you do not give consent you will be issued with a pin number which must be used instead.

4. Security of personal data and sharing with third parties

- 4.1. Generally, personal data collected by the School will remain with the School and will be processed by appropriate individuals only in accordance with access protocols. Particularly strict rules of access will apply in the context of medical information which will be held and accessed only by the School Medical Team, or, in the case of supporting documents for absence records by the HR Office, or otherwise in accordance with express consent.
- 4.2. The School will endeavour to ensure that all the personal data we hold for you is as up to date and accurate as possible. You must notify the School of any changes to that data and you may also be specifically asked to update your records.
- 4.3. The School will take appropriate technical and organisational steps to ensure the security of personal data, including policies around use of technology and devices, and access to School systems. In particular, all staff should be familiar with the School's Information Security Policy available in the 'Policies' folder via a link from the Staff Handbook.
- 4.4. Occasionally we will need to share your data with third parties, for example:
- BACS in order to pay salaries;
 - Pension providers so that your pension can be administered;
 - Auditors so that the School's accounts can be suitably audited;
 - Our legal advisers from time to time for the purpose of obtaining legal advice;

- Other organisations for the purposes of arranging training for you or your participation in school visits;
 - Consultants, experts or other advisors retained to help the School to fulfil its obligations or operate effectively (if the data is relevant to their work);
 - Public authorities, local authorities or other regulatory bodies such as the Independent Schools Inspectorate.
- 4.5. The School is under duties imposed by law and statutory guidance to record or report incidents and concerns that arise or are reported to us, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on HR or safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please view the School's Safeguarding Policy.
- 4.6. We may send your personal data to other countries in connection with: obtaining or providing references or other pre-employment information, organising overseas school visits or communicating with you when you are overseas. Your data may also be stored on computer servers based overseas via cloud services such as those provided by Google or Microsoft 365.
- 4.7. Finally, in accordance with Data Protection Law, some of the School's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. Where possible this is subject to contractual assurances that personal data will be kept securely and only in accordance with the school's specific directions.

5. How long we will keep your personal data

- 5.1. The school will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the recommendation is that ordinary HR files are kept for a minimum of 6 years, however schools are currently obliged to keep all records relating to the care of children for an indefinite period.
- 5.2. If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Bursar or Assistant Bursar (Compliance). However, please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such request.
- 5.3. Please refer to the School's Record Keeping and Retention Policy for more information.

6. Your rights regarding your personal data

- 6.1. Under Data Protection Law you have the right to request access to information about you that we hold. To make a request for any of your personal information please contact the Bursar or Assistant Bursar (Compliance), (finance@godolphinandlatymer.com).
- 6.2. You also have the right to: object to processing of personal data that is likely to cause, or is causing, damage or distress; prevent processing for the purpose of direct marketing; in certain circumstances have inaccurate personal data rectified, blocked, erased or destroyed; and claim compensation for damages caused by a breach of Data Protection Law.
- 6.3. Where the School is relying on your consent to process your personal data, you have the right to withdraw this consent at any time. Please be aware however that the School may have another lawful reason to process the personal data in question even without your consent.

7. Further information and guidance

- 7.1. The School will update this privacy notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.
- 7.2. If you believe that the School has not complied with this privacy notice, or has acted otherwise than in accordance with Data Protection Law, you should notify the Bursar in writing. You can also use the School's Complaints Procedure (available on the website). You are also entitled to make a referral to, or lodge a complaint with, the Information Commissioner's Office (ICO), although the ICO does recommend that steps are taken to resolve the matter with the School before involving the regulator.