

Transparency Notice for staff

Introduction

- 1 During the course of the School's activities the School will process personal Data about staff.
- 2 This notice is aimed at all School staff and explains how the School uses Personal Data that is covered by the Data Protection Act 1998 (the **Act**). The School may amend this statement at any time.
- 3 The purpose of the Act is to safeguard information about individuals. The Act covers issues such as data security, an individuals' rights to access information their personal data and use and the disclosure of Personal Data.
- 4 The School is a **Data Controller** under the Act. This means that it is responsible for compliance with the Act.
- 5 **Personal Data** is information about identifiable individuals that is held on a computer or is held in a file by reference to specific criteria concerning the individual. It also applies to some other records such as certain medical records.
- 6 The School has appointed the Bursar as its Data Protection Officer (**DPO**). Any questions that you have in relation to this policy should be sent to the DPO.

What Personal Data the School holds and how it is acquired

- 7 Examples of the Personal Data which the School holds about staff include:
 - 7.1 information gathered during the recruitment process such as information about education and qualifications, professional achievements and suitability for the position applied for;
 - 7.2 information about job performance. This includes information about skills, achievements, career progression and disciplinary related matters; and
 - 7.3 other information about staff such as financial information, photographs, expressions of opinion or indications as to intentions regarding staff.
 - 7.4 Biometric information, specifically finger and thumbprints (please see the guidance on biometric systems in the new staff induction pack for further information).
- 8 The School may process sensitive personal data relating to staff including
 - 8.1 Information about staff physical or mental health conditions in order to monitor sick leave and take decisions regarding fitness for work; and
 - 8.2 Information about protected characteristics of staff in accordance with the School's Equal Opportunities Policy in order to monitor compliance with equal opportunities legislation.
- 9 The School may acquire Personal Data in a number of ways. For example:

- 9.1 staff may provide the School with Personal Data about themselves, for example, during the recruitment process;
- 9.2 Personal Data may be created internally by the School during the course of employment. An email from the Head to a member of staff complimenting them on class management would be an example of this; and
- 9.3 Personal Data may be acquired from outside of the School community such as from other schools, public authorities, public sources and in connection with references.

How the School uses Personal Data

- 10 In respect of staff, the School commonly uses Personal Data for:
 - 10.1 ensuring that the School provides a safe and secure work environment;
 - 10.2 providing employment services (such as payroll and references);
 - 10.3 providing training and support;
 - 10.4 protecting and promoting our interests and objectives - this includes fundraising;
 - 10.5 for personnel, administrative and management purposes and to enable the School to meet its legal obligations as an employer. For example, to pay staff and to monitor their performance;
 - 10.6 safeguarding and promoting the welfare of all staff and pupils; and
 - 10.7 fulfilling our contractual and other legal obligations.
- 11 The School may use Personal Data for other purposes where the Act allows and where providing an explanation would not be appropriate. For example, this includes sharing Personal Data about staff with the relevant statutory agencies investigating allegations of misconduct or for the prevention and investigation of crime and the prosecution of offenders. The School will not use Personal Data for any other purpose unless it has first communicated the other purposes or it considers it is reasonable and fair to do so.

Specific examples

- 12 **CCTV:** The School uses CCTV recordings for the purposes of crime prevention and investigation and also in connection with its obligation to safeguard the welfare of pupils, staff and visitors to the School site. CCTV recordings may be disclosed to third parties such as the police but only where such disclosure is in accordance with the Act. Further information about the use of CCTV can be found in the School's Security, Access Control and Workplace Safety Policy which is available on the School's network and website.
- 13 **Photographs and video recordings:** The School may use photographs and video recordings of staff for marketing and promotion purposes including in School publications, in social media and on the School website. The School may also allow external publication of media where appropriate (for example, in a local newspaper) the School may also make recordings for teaching purposes, for example, recording drama lesson to provide feedback to pupils.

- 14 **Biometric Information.** The School collects, stores and processes staff biometric data via fingerprint scanning technology for the purpose of the door access control system and for use in the School's cashless catering system. Specific permission is requested from you for the holding of this information and consent may be withheld or withdrawn at any time. Your biometric data will be deleted when your employment terminates, or if for some other reason you cease to use the biometric system.
- 15 **Medical information;** The School may use any medical information disclosed by staff for assistance in any emergency treatment required for purposes of providing information to the leader of a school trip.
- 16 **Software:** Software, which monitors School email and internet browsing activities is covered in the IT Acceptable Use Policy.

Further Information

- 17 **Contact:** If you would like any further information about anything within this notice please contact the Bursar.