



BRENTFORD SCHOOL FOR GIRLS

Privacy Notice – Staff

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 UK General Data Protection Regulation (UK GDPR).

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

It applies to all current and former employees, workers and contractors.

Who Collects this Information?

Brentford School for Girls is the data controller of the personal information you provide to us. This means the school determines the purposes for which, and the manner in which, any personal data relating to staff and their families is to be processed. The Data Protection Officer is responsible for overseeing data protection within the School. Their role is to oversee and monitor the school's data protection procedures and to ensure they are compliant.

Categories of School Workforce Information we Collect, Process, Hold and Share

- personal information such as name, address, home and mobile numbers, personal email address, employee or teacher number, marital status, national insurance number;
- special categories of data including characteristics information such as gender, age, ethnic group, religious or similar beliefs, disabilities, specific medical information;
- Emergency contact information such as names, relationship, phone numbers and email addresses;
- Information we collect during the recruitment process that we retain during your employment including references, proof of right to work in the UK, application form, CV, qualifications;
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information;
- Details of any dependants;
- contract information such as start dates, hours worked, post, roles and salary information, bank/building society details;
- Payroll information relating to salary and variances which are shared with payroll provider, and relevant pension bodies (Teachers' Pension and LGPS administrators);
- Criminal records information as required by law to enable you to work with children;
- work attendance and absence information (such as number of absences and reasons information regarding physical and/or mental health and holiday records);
- qualifications, training courses attended and training record, and, where relevant, and where relevant subjects taught;
- performance information such as appraisals and performance reviews, training, performance measures including performance management/improvement plans, conduct, disciplinary, capability or grievance records;
- Biometric fingerprint impression for identification for cashless school meal service;
- Information about the use of our IT, communications and other systems, and other monitoring information;

- Images of staff captured by the school's CCTV system;
- Medical information to assist should a member of staff be taken ill;
- Details of your use of business-related social media;
- Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within the school, you will be notified separately if this is to occur);
- Details in references about you that we give to others; and
- Recordings of staff from the school's video conferencing platforms i.e. Zoom, Google Classroom.

How we Collect this Information

We may collect this information from you in your application form, but we will also collect information in a number of different ways. This could be through the Home Office, our pension providers, medical and occupational health professionals we engage with, your trade union, and even other employees. Information is also collected through CCTV, access control systems and any IT system the school has in place.

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 override those interests.
- When you have provided us with consent to process your personal data.
- 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.
- 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.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

How we Use Particularly Sensitive Information

Sensitive personal information (as defined under the UK GDPR as “special category data”) require higher levels of protection and further justification for collecting, storing and using this type of personal information. We may process this data in the following circumstances:

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations in line with our data protection policy;
- Where it is needed in the public interest, such as for equal opportunities monitoring (or in relation to our pension scheme); and
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards. Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is necessary to protect your interests (or someone else’s interests) and you are not capable of giving your consent.

We will use this information in the following ways:

- Collecting information relating to leave of absence, which may include sickness absence or family related leave;
- To comply with employment and other laws;
- Collecting information about your physical or mental health, or disability status, to ensure your health and welfare in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to manage sickness absence and to administer benefits;
- Collecting information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting; and
- To record trade union membership information to pay trade union premiums and to comply with employment law obligations.

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.

Lawful Basis on which we Process this Information

We process this information to comply with Inland Revenue regulations and EfA - Departmental Censuses) is the Education Act 1996 – this information can be found in the guide documents on the following website <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

Other information:-

- to enable the development of a comprehensive picture of the workforce and how it is deployed;
- to inform the development of recruitment and retention policies;
- to safeguard our pupils and other individuals and to ensure safe working practices; and
- in the interest of ensuring equal opportunities and treatment.

Storing this Information

We hold school workforce data in line with our retention policy, this can be found as an attachment to our Data Protection Policy.

Except as otherwise permitted or required by applicable law or regulation, the school only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes. Once you are no longer a staff member at the school we will retain and securely destroy your personal information in accordance with our data retention policy. This can be found: [N:\School Policies](#).

We limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. You can find further details of our security procedures within our Data Breach policy, which can be found: [N:\School Policies](#).

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.

Who we Share this Information with

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. 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. These include the following:

- the Department for Education (DfE);
- Ofsted;
- Prospective Employers;
- Welfare services (such as social services);
- Law enforcement officials such as police, HMRC;
- Local Authority Designated Officer (LADO);
- Training providers;
- Professional advisors such as lawyers and consultants;
- Support services (including HR support, Occupational Health insurance, IT support, information security, pensions and payroll);
- The Local Authority;
- DBS; and
- Recruitment and supply agencies;

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.

Data Collection Requirements

The DfE collects and processes personal data relating to those employed by state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and

Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Your Rights of Access, Correction, Erasure and Restriction

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.

If you want to exercise any of the above rights, please contact Melanie Baldy (Business Manager) in writing.

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 Melanie Baldy. 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.

We hope that Melanie Baldy 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 Melanie Baldy, then you can contact the DPO on the details below: -

Data Protection Officer: Judicium Consulting Limited

Address: 72 Cannon Street, London, EC4N 6AE

Email: dataservices@judicium.com

Web: <https://www.judiciumeducation.co.uk/>

How to Raise a Concern

If an individual wants to exercise any of these rights or if you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern in the first instance with either the Data Controller in school or our Data Protection Officer. Alternatively, you can contact the Information Commissioner’s Office at <https://ico.org.uk/concerns/>