



## Privacy Notice - Data Protection Act 1998 / 2018

### STAFF – March 2024 Issue

Under Data Protection Law, individuals have a right to be informed about how the School uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about our **staff, governors and volunteers**. If you are applying for a job with the school, it also covers the information we hold as part of the recruitment process.

This document is issued in hard copy upon first joining the school. Thereafter, updates are posted on the school website.

Vyners School is part of Vanguard Learning Trust, which is a registered 'data controller' for the purposes of Data Protection law. The Trust has a central Data Protection Policy, a copy of which can be obtained from the Trust website.

Each School within the Trust has appointed a Data Protection Lead (DPL) who is your first point of contact for any queries or subject access requests.

The DPL for Vyners School is – Miss Karen Williams

The Trust is also required to appoint a **Data Protection Officer**. Your DPO is:

Miss Karen Williams, Business Manager, [kwilliams@vynersschool.org.uk](mailto:kwilliams@vynersschool.org.uk), 01895 234342

### **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
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Some medical information (including about Covid-19 status)
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in an application form, 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
- Performance Management information
- Outcomes of any disciplinary and/or grievance procedures (retained in line with Trust policies)
- Absence data

- Copy of driving license (if you drive the school minibuses)
- Photographs
- CCTV footage
- Data about your use of the School's ICT systems
- Data on your social media presence (obtained as part of the initial recruitment process)

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

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

The purpose of processing this data is to help us run the school, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards students
- Ensuring your safety and wellbeing whilst engaged on school / Trust business
- To comply with national requirements around controlling the Covid-19 pandemic, and to keep individual within our school community as safe as possible
- Support effective performance management and pay progression
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring
- Improve the management of workforce data across the sector

Personal data, including CCTV footage, may be used (and shared with relevant third parties) as part of investigations into staff and student conduct. Staff are advised that any communications from them contained in school IT systems (including google drive, google mail and google classroom) may be disclosable to parents and students as part of a subject access request.

### **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:

- Fulfill a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

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

- You have given us consent to use it in a certain way (we may seek that consent from you in writing, electronically or verbally)
- We need to protect your vital interests (or someone else's interests)

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 your data.

**Where you have provided us with consent to use your data, you may withdraw this consent at any time by contacting Karen Williams in writing (or by email).**

### **Collecting this information**

While the majority of information we collect 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.

### **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 the Information and Records Management Society's Record Retention Guidelines (a copy of which is available on the website and may be requested from the Business Manager).

### **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:

- The **London Borough of Hillingdon** – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- The **Department for Education** - to meet our legal obligations to share certain information with it, such as workforce data
- Other educational organisations or employers / recruitment agencies - e.g. to provide employment references when you are seeking to develop your career
- The **Home Office**, in particular the Visa Sponsorship section who issue permits to work for overseas nationals
- **Examining bodies** – in order to facilitate the entry of our students into public exams ● **Ofsted** – to meet our obligations in relation to the statutory inspection of state schools.
- Other schools within Vanguard Learning Trust, where services are provided to the MAT as a whole
- **Edulink** which in turn uses the Gov Notify service provided by the UK Govt. The school uses its texting service to either communicate whole school emergency messages (e.g. about school closures or lockdowns) or individual / small group messages
- Suppliers and service providers – particularly **Squidcard, Biostore, School Cloud and ESS** to enable them to provide the service we have contracted them for, such as the provision of our cashless catering, support for remote parents evenings and our management information system.
- **Applicaa Ltd**, who supply the online portal we use to collect data about students joining the school (Admissions+)

- **EduFOCUS Ltd**, who supply the online portal we use to organise school trips and visits (Evolve)
- **PracticePal** who provide the electronic platform which enables us to timetable (and mark student attendance at) peripatetic music lessons.
- **Place 2 Be**, which provides mental health support to students.
- **PupilProgress.com**, which enables the school to benchmark year 11 attainment data in maths and English against the national cohort.
- The **National College Training hub** and **IHASCO** online training platforms in order to facilitate staff access to online training materials. Personal details are limited to staff email address and full name.
- Pension providers – in particular **Teachers Pensions (TPS)**, the **London Borough of Hillingdon (for LGPS)** and **Hampshire County Council (for LGPS)**
- Our Payroll Bureau (**Juniper Education** from **October 2022**)
- Our external and internal auditors (**Kreston Reeves** and **Bishop Flemming**)
- **IMP**, who provide the salary budgeting tool used by the central finance team at Vanguard Learning Trust.
- **HMRC** - to meet our legal obligations in relation to the settlement of tax
- The **Health and Safety Executive** – to comply with our statutory obligation in relation to accident and RIDDOR reporting
- Health authorities, including **Asclepius Occupational Health** (who act as our Occupational Health advisors) and potentially the emergency services
- **Crinkle Recruitment (via Schools HR Cooperative)** – in relation to the provision of statutory DBS checks
- Security organisations – in particular **EST** who service our CCTV system

The School uses G Suite for Education (from Google) to support the delivery of education. Staff will be routinely issued with a Google email account, access to Google calendar, restricted access to You Tube and access to Google Classroom. The Privacy Notices for this suite of products can be separately accessed via the following link: [https://workspace.google.com/terms/education\\_privacy/?hl=en-GB](https://workspace.google.com/terms/education_privacy/?hl=en-GB)

The School will also routinely put information into the public domain in order to demonstrate the high standards of education being delivered at Vyners School, by our staff and volunteers. This information will be limited to the name, job title and a possible picture of an individual. Information will be used in such places as the school website and twitter / Facebook accounts, in regular newsletters, in documents such as concert programmes, the school prospectus and around the school in corridors and classrooms.

### **Job applicants**

Individuals applying for employment at Vyners School will have their personal data processed in line with the guidance above.

Information on unsuccessful applicants will be deleted 6 months after the recruitment process has been concluded.

Vyners School has additionally adopted the Vanguard Learning Trust common application form from Easter 2023. This form deliberately segregates personal information supplied by applicants and ensures that wider school staff involved in the recruitment process (outside HR) only have access to information regarding a candidate's qualifications and experience during the shortlisting and

interviewing process. Personal data such as home address, contact details, ethnicity, date of birth etc. will be withheld.

### **Google Meet**

The global pandemic of 2020-22 and the requirement for schools to transfer to 'remote learning' resulted in some lessons, tutorials and educational interventions (e.g. mentoring sessions) being conducted via Google Meet. This is the School's preferred video meeting platform.

Whilst the school no longer records live lessons, the use of Google meet is still used for conducting remote meetings and events with both adults and students. The Schools usual standards of behaviour (for both students and staff) operate in Google Meet sessions.

Google meet sessions hosted by the school will not routinely be recorded. Where they are, this will be made clear at the start of the session.

### **Photographs / film footage of staff**

The School will routinely take and retain a photo of every member of staff in the school. This will be stored securely on our management information system (SIMS) and made available internally to other staff to facilitate the effective working relationships within school.

The photos are taken and supplied initially by the local ICT support team. Staff may choose to have their photo replaced in due course by one taken by the School's external photographer – currently **Tempest Photography**.

The school reserves the right to take photos at official events, such as school concerts, the annual Staff Conference, sports days, during school trips etc. Such photos are intended as an official record of the event and may be shared internally within the school community, or used as part of corridor displays or publicity material. Staff who do not wish to be a part of such photos are empowered to simply remove themselves from shot, or to make it known before an event that they wish to be excluded.

Photographs may also be taken at more social events. Where the school intends to take photos, staff will be informed beforehand. Staff are asked to note that the school cannot control the taking or publication of unofficial photos taken by other members of staff.

When choosing to publish private photos taken at a school event, all staff are reminded of the guidance contained in the VLT ICT Acceptable Usage Policy (a copy of which is available on the VLT website) concerning the publication of photographs, especially on social media forums.

### **Transferring data internationally**

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.

### **Your rights - How to access personal information we hold about you**

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact Karen Williams.

### **Your other rights regarding your data**

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have 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 contact Karen Williams.

### **Complaints**

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact the Data Protection Officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113 ● Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

*This notice is based on the Department for Education's model privacy notice for students, amended for staff and to reflect the way we use data in this school.*