



## Privacy Notice - Data Protection Act 1998 / 2018 STAFF – March 2021 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 and volunteers**.

It 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

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

### **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:

- Fulfil 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 your DPL 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
- **Public Health England, NHS Track and Trace**, and other public bodies responsible for the management of the Covid-19 pandemic
- 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 Capita Sims** 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.
- Pension providers – in particular **Teachers Pensions (TPS), the London Borough of Hillingdon (for LGPS) and Surrey County Council (for LGPS)**
- Our Payroll Bureau (currently **SGW Payroll** from 1 April 2019)
- Our external and internal auditors (currently **Azets and Cooper Parry**)
- **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 – in particular **Asclepius Occupational Health** and **Hillingdon Hospital** (who act as our Occupational Health advisors) and potentially the emergency services
- **Schools HR Cooperative** – in relation to the provision of statutory DBS checks
- Security organizations – 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 YouTube and access to Google Classroom. The Privacy Notices for this suite of products can be separately accessed via the following link: [https://edu.google.com/intl/en\\_uk/trust/](https://edu.google.com/intl/en_uk/trust/).

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.

### **Google Meet recordings**

The global pandemic of 2020-21 and the requirement for schools to transfer to 'remote learning' has 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.

Under the 'public interest criterion', the school reserves the right to take recordings of live lessons, virtual tutorials and other sessions for the following purposes:

- To act as a safeguarding control for both students and staff;
- To assist with the School's internal quality assurance process and the professional development of staff;
- To assist with the subsequent investigation of any behaviour concerns.

The recording of live lessons and tutorials are not primarily being taken in order to enable students to catch up on missed sessions. There is a clear expectation that students attend these events in real time, just as if they were physically in school.

Where a session is being recorded, participants will be clearly informed of the fact. Google Meet also clearly indicates a recording is taking place.

The School has set out clear protocols for students and staff surrounding such sessions. These protocols cover such issues as where participation in live events should take place, clothing, standards of acceptable language and behaviour etc.

All Google Meets may be subject to unannounced drop-ins from a member of the Senior Leadership Team. Recordings may also be subject to 'spot checking' by a member of the Senior Leadership team to ensure appropriate standards of conduct are being adhered to by all present.

All recordings will be kept as part of Google Drive and will be subject to automatic deletion 6 calendar months after the date of recording. School Leadership and the local IT team reserve the right to access any recording kept on a member of staff's individual google area.

If concerns have been expressed about the session and are unresolved at the date of deletion, a copy of the recording will be downloaded and kept until the concern or complaint has been resolved.

The provisions of the IRMS data retention toolkit (available via [www.vlt.org.uk](http://www.vlt.org.uk)) will be deemed to apply in such cases.

Staff must not share recordings of any sessions with students, parents or other staff without approval from a member of the Senior Leadership Team.

Students, staff and parents are explicitly prohibited from recording, photographing or taking a screenshot of the Google Meet session. Staff or students found to be doing so may be subject to behaviour or disciplinary sanctions.

### **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 your DPL.

### **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 your DPL.

### **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.*