



## Privacy notice for employees of Bridlington School

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' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our school.

We, Bridlington School, Bessingby Road, Bridlington, YO16 4QU, are the 'data controller' for the purposes of data protection law.

Our data protection officer is Helen Evans (see 'Contact us' below).

### 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
- Salary, allowances and annual leave, travel & overtime claims
- 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 a CV or cover letter or as part of the application and interview process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- DBS disclosure number, date of issue and details of criminal convictions and associated risk assessment
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Car registration details
- Absence information
- Copy of your driving license
- Data about your use of the school's information and communications system
- Information about business and pecuniary interests



We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Race, ethnicity, religious beliefs, sexual orientation and biometric data
- Health, including any medical conditions, and sickness records
- Disability and access requirements
- Sickness records
- Photographs and CCTV images captured in school
- Your image and / or voice (as part of a press release, social media recording or online learning recording)

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

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

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

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards students
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable equalities monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body
- Comply with the school's adopted policies
- Keep the school site safe
- Enable the use of biometric ID technologies
- Use your image / photograph for safeguarding or training purposes or as part of a school promotion
- Use your image and voice, as part of the school's online learning platform
- To provide references to your future employers
- Ensuring that appropriate access arrangements can be provided for those that require them

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.



## 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 need to protect your vital interests (or someone else's interests)
- We have legitimate interests in processing the data – this may happen whilst:
  - Promoting the objects and interests of the school, this includes fundraising and school trips.
  - Promoting your welfare and the welfare of others in the school

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

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.

## Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation



## 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.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals
- Previous employers / referees (as part of the recruitment process)

## How we store this data

Personal data is stored in line with our Data Protection Policy and Information Retention Policy.

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. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

Once your employment with us has ended, we will retain this file and delete / destroy the information in it in accordance with our Information Retention Policy. Under normal circumstances, this would be six years after the end date of your employment.

A full copy of the school's Information Retention Policy can be requested from Jan Elmhirst.

## 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:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about headteacher performance, staff dismissals
- Our local authority – to provide support to the school through agreed Service Level Agreements (HR, Payroll, Occupational Health)
- Our local authority – to report upon accidents in school, insurance claims
- The Health & Safety Executive (HSE) – to report upon specific incidents / accidents occurring in the course of your employment
- The Department for Education – for statutory compliance, such as the workforce census
- Educators and examining bodies – for compliance purposes according to Joint Council for Qualifications (JCQ)
- Ofsted – as part of a school inspection, such as the single central record
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as premises management, supply of goods
- Financial organisations – to enable them to provide a service to ourselves and / or you, such as The Teachers' Pension Scheme
- Central and local government – such as, HM Revenue & Customs (HMRC) for income tax / national insurance deductions
- Our auditors – engaged from the Local Authority to inspect financial, safeguarding, single central record and / or health & safety



- Health authorities – where this is in your vital interest, for example, if you were taken suddenly ill with a medical condition known to the school, or you contracted a notifiable or occupational disease
- Health and social welfare organisations – where the school is legally obliged to provide the information requested, for example from the Department for Work & Pensions (DWP) in relation to Child Maintenance
- Professional advisers and consultants – to enable them to provide the service we have contracted them for, such as commissioned quality assurance visits
- Police forces, courts, tribunals – where the school is legally obliged to provide the information requested, such as personal details, salary information, CCTV footage
- Software providers - external companies that provide software used in school to process information where your personal data may be stored, such as SIMS, SISRA observe (Where the school shares data with a third party processor, the same data protection standards that Bridlington School uphold are imposed upon the processor)
- NHS Test & Trace, where you have been identified as someone who has been in close contact with a person that has tested positive for Covid-19.

### Transferring data internationally

Where we transfer your personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

### 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 a clear format

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 our data protection officer.

#### Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data where it is likely to cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to and challenge 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



- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

## 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 our 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

## Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- Helen Evans, 01262 672593 ext 211
- By email: [dataprotection@bridlingtonschool.org.uk](mailto:dataprotection@bridlingtonschool.org.uk)

