



**St George's**  
School Edgbaston

# PRIVACY POLICY FOR STAFF

Revised: July 2018



We are committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with data protection law.

## Who are we?

We are St George’s School and our address is 31 Calthorpe Road, Edgbaston, Birmingham, B15 1RX. We are the data controller of personal information about you.

If you have any questions about this policy or how we are using your personal information, please contact our Data Protection Officer Mr L Nicholas at [dpo@sgse.co.uk](mailto:dpo@sgse.co.uk).

## What is this privacy policy about?

This privacy policy tells you how we use your personal information as your employer both during and after our employment relationship. It is important that you read this notice so that you are aware of how and why we are using the personal information we are collecting, storing and using about you. Your rights over your personal information and how to exercise those rights is also set out in this privacy policy. This privacy policy answers the following questions – please click on the heading to take you to the section of this privacy policy that you would like to read:

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## **What personal information do we collect about you?**

We will collect personal information from you when you become our employee. This will be: name; gender; marital status; previous surname(s); contact details; date of birth; NI number; employment history; qualifications; certificates; details about your role and salary; start date; bank details; pension details; absence information; information about your use of our systems; maternity/paternity/adoption information; car registration; course attendance; appraisals and performance information; grievance and disciplinary information; timesheets and use of fobs to get in and out of the building; videos and photos; first aid certificates; resignation letters; exit interviews; passport; driving licence; trade union information; parental leave requests; appraisal; performance; training and qualifications.

We will also collect sensitive or special categories of personal information from you. This will be: criminal record information; medical information including doctors' notes and sickness absence; return to work information; accidents at work; nationality, religion; trade union membership.

We also have CCTV on our premises for security reasons, to record any injuries and accidents sustained on School grounds and for identification purposes and may therefore collect images of you on our CCTV systems.

## **How do we use your personal information and what is our legal basis?**

We have set out below how we use your personal information. In addition, we have set out our legal basis to use your personal information as we need to tell you this under data protection law.

### **Information used for contract purposes:**

We will collect, store and use your personal information in order to administer your employment contract;

We will use your personal information to:

- pay you and provide employment related benefits;
- set the terms on which you work for us (including any flexible working arrangements);
- assess your work performance;
- monitor your use of our systems;
- enrol you in a pension scheme;
- keep an audit trail of the checks we have made and our relationship with you in case of employment claims;
- arrange for appropriate training and development;

- administer the employment contract we have with you;
- deal with any notice to leave and make arrangements in relation to your leaving;
- review and assist with emigration matters; and
- keep a record of your absences.

We collect, store and use your personal information for the purposes set out above on the legal basis that it is necessary for performance of your employment contract with us.

### **Information we use to run our School:**

We will collect, store and use your personal information for the purpose of running our School.

We will use your information to:

- create internal records e.g. meeting notes, records of training, attendance at meetings or training, leavers and new starters;
- set up an employee directory;
- deal with legal disputes involving you, or other employees, workers and contractors, including accidents at work;
- monitor your use of our systems;
- safeguard students;
- keep our network and systems secure;
- investigate, pursue or defend a legal claim;
- provide references; and
- investigate and deal with whistleblowing issues or compliance matters.

The legal basis for this use is that it is in our legitimate interests as a School to be able to use your personal information in this way to run our School and to enable you to carry out your role. As you will see from how we use your personal information the uses are those which any well run organisation would ordinarily use personal information and we only use personal information which is needed for each purpose. We believe that this is a proportionate use of your personal information.

### **Information we use for job performance evaluations:**

We will collect, store and use your personal information for the purpose of evaluating your job performance.

We will use the personal information we handle on this basis:

- to carry out annual performance reviews;

- to carry out job evaluation meetings;
- gathering evidence for possible disciplinary or grievance hearings;
- making decisions about salary reviews and remuneration;
- to assess qualifications for a particular job or task, including decisions about promotions;
- to make decisions about your continued employment or engagement;
- to keep a record of employee skills;
- to keep a record of course completion;
- to record individual development plans; and
- for succession planning.

Our legal basis for this use is that it is in our legitimate interests as a School to ensure that our employees are capable of carrying out their job role, facilitate training where necessary and assist with the job progression of employees. We believe that this is a proportionate use of your personal information as the process is designed to provide you with feedback on your performance and ensure that opportunities for development are given to all employees. When carrying out the processing we will limit the personal information to that which is necessary.

#### **Information used for compliance:**

We will collect store and use your personal information for compliance purposes:

We will use your personal information to:

- comply with our employment obligations e.g. to check you are legally entitled to work in the UK;
- comply with health and safety obligations;
- make reports to third parties for example the LADO or the police where we are required to;
- prevent and detect criminal activity and fraud;
- comply with tax and national insurance obligations;
- provide appropriate reasonable adjustments for employees; and
- comply with any other legal or regulatory requirements.

#### **What happens if I don't provide the personal information you have asked for?**

If you don't provide the personal information we need, we may not be able to perform our employment contract with you (such as paying you or providing a benefit), or we may not be able to comply with our legal obligations (such as to ensure the health and safety of our workers or to auto-enrol you on a pension scheme). If you have any

concerns about whether you need to provide the personal information, please get in touch with us using the contact details at the start of this privacy policy.

### **Do we use your personal information to make automated decisions?**

You will not be subject to decisions that will have a legal or significant impact on you based solely on automated decision-making which means there will always be human involvement in the decisions that we make about our employees or potential employees and we don't make decisions using only computer technology.

### **How long will we keep your personal information?**

We will keep the personal information that we have about you as a member of staff for a period of time specified on our Data Retention Schedule in order to comply with our legal obligations. For further information, please contact our Data Protection Officer Mr L Nicholas at [dpo@sgse.co.uk](mailto:dpo@sgse.co.uk).

If a dispute arises between us, we will hold on to your personal information so that we can deal with the dispute and this may mean that we keep your personal information for longer than this period.

We will ensure that your personal information is securely deleted after the periods stated above.

### **Who will we share your personal information with?**

We will only share the personal information that you give us with the following third parties and for the following reasons:

- **With third parties who provide or support our IT systems:** We use reputable third parties to provide us with our IT systems and support for them, for example SIMS and CPOMS. They may access your personal information to the extent that they need to in order to provide their services or provide support to us as our processor;
- **With third parties who provide systems and support for education and learning:** We use reputable third parties (for example epraise, bSquared, ParentMail, ParentPay, Kerboodle, Accelerated Reader, Unifrog, Schools Fee Plan, Pearson Active Teach, PrimeTimetable, ISI, DFE (S2S, Collect), BugClub, MyMaths, Literacy Planet, Nessy, Cogmed, Testwise) to assist with providing our education and learning to pupils. They may access your personal information to the extent that they need to in order to provide their services or provide support to us. The legal ground for this is that it is in our legitimate

interests to be able to use reputable third parties to provide systems and support for education and learning to us as our processor;

- **With Lloyds Bank and pension schemes (or replacement providers):** We share your personal information with Lloyds and the provider of your pension so that we can arrange for you to be paid and for your pension to be paid into. The legal ground for this is that it is necessary to comply with our legal obligations as your employer;
- **In the unlikely event that we merge with or transfer our School assets:** If we sell all or part of our School, or merge with another school, we may transfer personal information that we have collected as described in this privacy policy, along with our other assets, to the organisation that we are selling to or merging with. The legal ground for this is that it is in our legitimate interests to be able to merge or sell our School. For further information on our legitimate interests, please contact our Data Protection Officer Mr L Nicholas at [dpo@sgse.co.uk](mailto:dpo@sgse.co.uk);
- **With entities, companies or individuals outside St George's School for legal reasons:** We will share your personal information with entities, companies or individuals outside St George's School where it is necessary to comply with any law, rule, regulation, legal procedure or governmental request that is applicable to us, for example sending financial information to HMRC and sending information about our School to the Department for Education. We also have legal obligations (including in relation to safeguarding children) to report issues that arise or that are reported to us if they meet a certain level of seriousness and this may need to take place whether or not the issues are proven. This may include referrals to relevant authorities such as the LADO, the local authority or the police. The legal ground for this is that sharing your personal information in this way is necessary in order for us to comply with our legal obligations; and
- **With entities, companies or individuals outside St George's School to obtain advice:** We also share your personal information with external professional advisors such as lawyers or accountants in order to take advice and for the purposes of legal and tribunal proceedings. The legal ground for this is that it is in our legitimate interests to be able to obtain professional advice from our external advisors about issues that may arise within our School. For further information on our legitimate interests, please contact our Data Protection Officer Mr L Nicholas at [dpo@sgse.co.uk](mailto:dpo@sgse.co.uk).

## **Will we transfer your personal information outside the European Economic Area?**

We store your personal information in the United Kingdom or in countries within the European Economic Area (“EEA”).

We will only transfer your personal information outside the EEA where our third party service providers who we share personal information with (as set out above) are based outside the EEA, have support services located outside the EEA or host personal information outside the EEA.

We only transfer your personal information outside the EEA where we have a legal ground for doing so and where we ensure that your personal information is protected to the same standard as it would be protected in the UK. We do this by entering into data sharing agreements with the recipients of your personal information based outside the EEA which comply with the EU Commission’s standard clauses for the transfer of personal information, or where the third party is based in the US and is part of the US Privacy Shield.

If you would like further details about our transfer of your personal information outside the EEA please contact our Data Protection Officer using the contact details at the start of this privacy policy.

## **What are your rights over your personal information**

You have a right to make a complaint at any time to the Information Commissioner’s Office (ICO), (the UK regulator for data protection issues. See <https://ico.org.uk/>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO and so, if you are happy to do so, please contact our Data Protection Officer Mr L Nicholas at [dpo@sgse.co.uk](mailto:dpo@sgse.co.uk) in the first instance and we will try to resolve your issue.

You have a number of other rights over your personal information, which are:

- the right to ask us what personal information we have about you and to have a copy of your personal information from us;
- the right to ask us to correct any errors in your personal information;
- the right to object to our legitimate interests and our profiling activities where these are based on our legitimate interests;
- the right to object to us sending you marketing communications;
- the right to ask us to provide you with a copy of the personal information you have provided to us, in a structured, commonly used and machine-readable



format and the right to transmit that personal information to another entity where: (i) we are using your personal information on the basis of your consent or on the basis that it is necessary to perform a contract with you; and (ii) the use we are making of your personal information is carried out by automated means;

- the right to ask us to delete your personal information where: (i) we don't need your personal information anymore; (ii) you withdraw your consent to our use of your personal information and we have no other legal basis to keep your personal information; (iii) you have asked us to review and explain our legitimate interests to you and we don't actually have a valid legitimate interest to do what we are doing; (iv) our use of your personal information is illegal; (v) we have to delete your personal information to comply with our legal obligations;
- the right to ask us to restrict the use that we are making of your personal information where: (i) you don't think the personal information we have about you is correct, so that we can check if it is correct; (ii) what we are doing with your personal information is illegal but you would rather we stop using your personal information rather than delete it; (iii) we don't need your personal information anymore, but you need us to keep it so that you can exercise any legal rights; and (iv) you have asked us to review and explain our legitimate interests to you, so that we can check whether we actually have a valid legitimate interest to do what we are doing;
- the right to ask us to transfer your personal information in certain circumstances; and
- where the use of your personal information is based on your consent, the right to withdraw your consent at any time by contacting us at [dpo@sgse.co.uk](mailto:dpo@sgse.co.uk).

If you would like to exercise any of these rights over your personal information, please contact our Data Protection Officer Mr L Nicholas at [dpo@sgse.co.uk](mailto:dpo@sgse.co.uk) for further information.

### **How we'll keep your personal information up to date**

It is important that the personal information that we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

### **How we'll tell you about changes to this privacy policy**

We keep our privacy policy under regular review. Any changes we make to our privacy policy will be published in an updated privacy policy your website. Any major changes to this document will be communicated with you via email.