

RYDES HILL PREPARATORY SCHOOL & NURSERY

P- 54 (ISI 7A) PRIVACY NOTICE FOR JOB APPLICANTS, STAFF, PERIPATETIC TEACHERS, SPORTS COACHES, GOVERNORS & VOLUNTEERS



RYDES HILL

PREPARATORY SCHOOL & NURSERY

MISSION STATEMENT

- ❖ Rydes Hill Preparatory School and Nursery is a Catholic school where children learn how to live in loving relationship with God and each other.
- ❖ Christian virtues of love and justice, faith and courage, hope and perseverance are fostered.
- ❖ Pupils and staff comprise individuals of different faiths and beliefs but the Rydes Hill community aspires to unity within the life of the school based on shared moral values.
- ❖ The importance placed on the development of individual talents is at the heart of what school stands for and all are encouraged and challenged to be the best they can be.

Written By :	Alison Packman – Compliance Officer	4 th May 2018
Reviewed By :	Kathryn Pillar – Bursar	8 th May 2018
Approved By :	Sarah Norville – Headmistress	18 th May 2018
Governor Review By :	Not required	

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Revision History

Revision	Paragraph Number	Revision
May 2018		New Document

Abbreviations, Acronyms , Terms and Definitions / Meanings

Abbreviation / Acronym / Term	Definition / Meaning
Biometric Data	Personal information about an individual's physical or behavioural characteristics that can be used to identify that person; this can include their fingerprints, facial shape, retina and iris patterns, and hand measurements.
CCTV	Closed Circuit Television
Data Controller	Organisations, including independent schools, that determine how people's personal data is processed and for what purpose.
Data Subjects	Any living individual whose data the Data Controller processes.
DBS	Disclosure and Barring Service
DfE	Department for Education
DSAR	Data Subject Access Request
FRHPS	Friends of Rydes Hill Preparatory School
GDPR	General Data Protection Regulations
HMRC	Her Majesty's Revenue & Customs
KCSIE	Keeping Children Safe In Education (Government published document)
LADO	Local Authority Designated Officer
NCTL	National College for Teaching and Leadership (replaced in April 2018 by the Teaching Regulation Agency)
Personal Data	Everything from which a Data Subject can be identified. It ranges from simple contact details via pupil files to safeguarding information, and encompasses opinions, file notes or minutes, a record of anyone's intentions towards that person, and communications (such as emails) with or about them.
Processing	Any action in relation to that personal data, including filing and communication.

SEN	Special Educational Needs
Social Protection	Concerned with preventing, managing and overcoming situations that adversely affect people's well-being and is designed to reduce poverty, diminish people's exposure to risks and enhance their capacity to manage social risks.
Special Category Data	Some categories of Personal Data are special category data under GDPR. These comprise data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; data concerning health or data concerning a natural person's sexual orientation; and biometric data.
Staff	Teaching and non-teaching staff, contractors, peripatetic teachers, sports coaches, casual workers, temps and volunteers, who may be employed or engaged by the school to work for it in any capacity.

Aim / Objective / Statement of Intent

This policy applies to the whole school including EYFS. Please ensure you have read the table above for the meanings of specific terms shown in this document in italics.

1. In the course of your employment, engagement or other basis of work undertaken for Rydes Hill Preparatory School & Nursery, we will collect, use and hold ("*process*") personal data relating to you as a member of our staff. This makes the school a data controller of your personal information, and this Privacy Notice sets out how we will use that information and what your rights are.
2. This information is provided because Data Protection Law gives individuals rights to understand how their data is used.
3. Anyone who works for, or acts on behalf of, the School (including staff, volunteers, governors and service providers) should also be aware of and comply with P53 Privacy Notice for Parents and Pupils.

Responsibility for Data Protection

4. The Governors of Rydes Hill Preparatory School & Nursery has appointed **Mrs Sarah Norville, Headmistress, and Mrs Kathryn Pillar, Bursar, as responsible for data protection**. They will deal with any requests or enquiries concerning the School's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is process in compliance with this policy and Data Protection Law.
5. They can be contacted as follows via email at headmistress@rydeshill.com or bursar@rydeshill.com or via telephone on 01483 563160. You may also write to either Mrs Norville or Mrs Pillar at Rydes Hill Preparatory School & Nursery, Rydes Hill House, Aldershot Road, Guildford, Surrey GU2 8BP.
6. The School has notified the Information Commissioner's Office of its processing activities. The School's ICO registration number is Z8528148 and its registered address is Rydes Hill Preparatory School & Nursery, Rydes Hill House, Aldershot Road, Guildford, Surrey GU2 8BP.

Who this document applies to

7. Academic and other staff, contractors, peripatetic teachers, casual workers, temps and volunteers or those seeking employment with the school, who may be employed or engaged by the School to work for it in any capacity, as well as prospective applicants for

roles. It also applies to Governors. For simplicity of reading, this document will refer to all of these individuals collectively as “staff”.

8. This notice is not aimed at pupils, or parents of pupils (whether current, past or prospective) or other members of the general public, nor does it inform staff how to handle the personal data of the same. This information may be found in P53 Privacy Notice – Parents & Pupils, which provides further details about how personal data will be used by the School, and P41 Data Retention Policy.

About this document

9. This Privacy Notice for Job Applicants, Staff, Governors & Volunteers, explains how the School collects, uses and shares (or *processes*) personal data of staff, and your rights in relation to the personal data we hold. It also explains how long data is retained for. (Further details can be found in P41 Data Retention Policy)
10. This Privacy Notice also applies in addition to the School’s other relevant terms and conditions and policies, including:
 - Any contract between the School and its staff, such as the terms and conditions of employment, and any applicable staff handbook;
 - The School’s P53 Privacy Notice for Parents and Pupils
 - The School’s P30 CCTV Policy;
 - The School’s P41 Data Retention Policy;
 - The School’s P04 Safeguarding Policy, P01 Anti-Bullying Policy, P38 Health & Safety Policy and P16 Behaviour, Rewards, Sanctions and Use of Reasonable Force Policy, including how concerns or incidents are reported or recorded (both by and about staff); and
 - The School’s IT policies, including P03 Use of ICT, Mobile Phones and Other Electronic Devices Policy, P48 Social Media Policy and P50 E-Safety Policy.
11. Please note that your contract with the School, including any document or policy forming a part of your contractual obligations to the School, may in particular be relevant to and supplement the information in this Privacy Notice, to the extent that it will contain details of obligations or rights of the School under contract with you which may require the use of your personal data. However, this P54 Privacy Notice is the primary document applicable to the use of your personal data by the School.

12. This Privacy Notice also applies alongside any other information the School may provide about particular uses of personal data, for example when collecting data via an online or paper form.

How we collect your information

13. We may collect your personal data in a number of ways, for example:

- From the information you provide to us before making a job application, for example when you come for an interview;
- When you submit a formal application to work for us, and provide your personal data in application forms and covering letters, etc; and
- From third parties, for example the Disclosure and Barring Service (DBS) and referees (including your previous or current employers or School), in order to verify details about you and/or your application to work for us.

14. More generally, during the course of your employment with us, as a member of staff, we will collect data from or about you, including:

- When you provide or update your contact details;
- When you or another member of staff completes paperwork regarding your performance appraisals;
- In the course of fulfilling your employment (or equivalent) duties more generally, including by filing reports, note taking, or sending emails on School systems;
- In various other ways as you interact with us during your time as a member of staff, and afterwards, where relevant, for the various purposes set out below.

The types of information we collect

15. We may collect the following types of personal data about you (and your family members and 'next of kin', where relevant):

- Contact and communications information, including:
 - Your contact details (including email address(es), telephone numbers and postal address(es));

- Contact details (through various means, as above) for your family members and 'next of kin', in which case you confirm that you have the right to pass this information to us for use by us in accordance with this Privacy Notice;
- Records of communications and interactions we have had with you;
- Biographical, educational and social information, including:
 - Your name, title, gender, nationality, marital status and date of birth;
 - Your image and likeness, including as captured in photographs taken for work purposes or incidentally in CCTV coverage (see P09 Taking, Using and Storing Images of Pupils and Staff and P30 CCTV Policy for further details)
 - Details of your education and references from your institutions of study;
 - Lifestyle information and social circumstances;
 - Your interests and extra-curricular activities;
- Financial information, including;
 - Your bank account number(s), name(s), and sort code(s) (used for paying your salary and processing other payments);
 - Your tax status (including residence status);
 - Gift Aid declaration information, where relevant (for example, where we help you to administer donations to charity from your pre-taxed earnings);
 - Information related to pensions, national insurance, or employee benefit schemes;
- Work related information, including;
 - Details of your work history and references from your previous employer(s);
 - Your personal data captured in the work product(s), notes and correspondence you create while employed or otherwise engaged to work for the School;
 - Details of your professional activities and interests;

- Your involvement with and membership of sector bodies and professional associations;
- Information about your employment and professional life after leaving the School, where relevant (for example, where you have asked us to keep in touch with you);
- Information obtained in order to comply with our statutory or regulatory requirements, (such as when making an application for a DBS check), including;
 - Copies of documents such as birth certificates, marriage certificates, utility bills, driving licenses, passports etc
- And any other information relevant to your employment or other engagement to work for the School.

16. Where this is necessary for your employment or engagement to work for us, we may also collect special categories of data, and information about criminal convictions and offences, including;

- Information revealing your racial or ethnic origin;
- Trade union membership, where applicable;
- Information concerning your health and medical conditions (for example, where required to monitor and record sickness absences, dietary needs, or to make reasonable adjustments to your working conditions or environment);
- Information concerning your sexual life or orientation (for example, in the course of investigating complaints made by you or others, for example concerning discrimination); and
- Information about certain criminal convictions (for example, where this is necessary for due diligence purposes, or compliance with our legal and regulatory obligations);

17. However, this will only be undertaken where and to the extent it is necessary for a lawful purpose in connection with your employment or other engagement to work for the School.

Basis for processing, using and sharing your data

Entering into, or fulfilling, our contract with you

18. We process your personal data because it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, such as contract of employment or other engagement with us. In this respect, we use your personal data for the following:

- Administering job applications and, where relevant, offering you a role with us;
- Carrying out due diligence checks on you, whether during the application process for a role with us or during your engagement with us, including by checking references in relation to your education and your employment history;
- Once you are employed or engaged by us in any capacity, for the performance of the contract of employment (or other agreement) between you and us;
- To pay you and to administer benefits (including pensions) in connection with your employment or other engagement with us;
- Monitoring your attendance and your performance in your work, including in performance appraisals;
- Promoting the School to prospective parents and others, including by publishing the work product(s) you create whilst employed by or otherwise engaged to work for the School;
- For disciplinary purposes, including conducting investigations where required;
- For other administrative purposes, for example to update you about changes to your terms and conditions of employment or engagement, or changes to your pension arrangements;
- For internal record-keeping, including the management of any staff feedback or complaints and incident reporting; and
- For any other reason or purpose set out in your employment or other contract with us.

Legitimate Interests

19. We process your personal data because it is necessary for our (or sometimes a third party's) legitimate interests. Our 'legitimate interests' include our interests in running

the School in a professional, sustainable manner, in accordance with all relevant ethical, educational, charitable, legal and regulatory duties and requirements (whether or not connected directly to data protection law). In this respect, we use your personal data for the following:

- Providing you with information about us and what it is like to work for us (where you have asked for this, most obviously before you have made a formal application to work for us);
- For security purposes, including by operating security cameras in various locations on the School's premises or in the School's vehicles (for further details please refer to P30 CCTV Policy);
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
- To provide education services to pupils;
- To safeguard pupils' welfare and provide appropriate pastoral care (by for example, accessing current and/or past employee's emails/notes of correspondence and meetings either internal or with external parties such as parents, in order to ascertain if there are/were any pupil concerns, safeguarding issues, HR disciplinary matters, which the School should be aware of);
- To carry out or co-operate with, any School or external complaints, disciplinary or investigatory process;
- For the purposes of management planning and forecasting, research and statistical analysis;
- In connection with organising events and social engagements for staff;
- Making travel arrangements on your behalf, where required;
- Contacting you or your family members and 'next of kin' for business continuity purposes, to confirm your absence from work, etc;
- Publishing your image and likeness in connection with your employment or engagement with us (for further details please refer to P09 Taking, Using and Storing Images of Pupils and Staff Policy);
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with P03 Use of ICT, Mobile Phones and Other Electronic Devices Policy, P48 Use of Social Media Policy, P17 Staff Handbook (Section E4) and government guidance such as KCSIE.

Legal Obligations

20. We also process your personal data for our compliance with our legal obligations, notably those in connection with employment, charity law, tax law and accounting, and child welfare. In this respect, we use your personal data for the following:

- To meet our legal obligations (for example, relating to child welfare, social protection, diversity, equality, and gender pay gap monitoring, employment and health and safety);
- For tax and accounting purposes, including transferring personal data to HM Revenue and Customs to ensure that you have paid appropriate amounts of tax, and in respect of any Gift Aid claims, where relevant;
- For the prevention and detection of crime, in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

Special categories of data

21. We process special categories of personal data (such as data concerning health, religious beliefs, racial or ethnic origin, sexual orientation or union membership) or criminal convictions and allegations for the reasons set out below.

22. We will process this data on the basis that such processing is necessary to carry out obligations and exercise rights (both yours and ours) in relation to your employment.

23. In particular, we process the following types of special category personal data for the following reasons:

- Your physical or mental health or condition(s) in order to record sick leave and take decisions about your fitness for work, or (in emergencies) act on any medical needs you may have, or in response to any concerns or complaints raised;
- Recording your racial or ethnic origin in order to monitor our compliance with equal opportunities legislation and to respond to our statutory and regulatory responsibilities (for example providing census information)
- Trade union membership, in connection with your rights as an employee and our obligations as an employer;
- Categories of your personal data which are relevant to investigating complaints made by you or others, for example concerning discrimination, bullying or harassment;

- Data about any criminal convictions or offences committed by you, for example when conducting criminal background checks with the DBS, or where it is necessary to record or report an allegation (including to Police or other authorities, with or without reference to you);

24. We will process special categories of persona data for lawful reasons only, including because:

- You have given us your explicit consent to do so, in circumstances where consent is appropriate;
- It is necessary to protect you or another person's vital interests, for example where you have a life-threatening accident or illness in the workplace and we have to process your personal data in order to ensure you receive appropriate medical attention;
- It is necessary for some function of substantial public interest, including the safeguarding of children, or as part of a process designed to protect you or others from malpractice, incompetence or unfitness in a role (or to establish the truth of any such allegations); or
- It is necessary for the establishment, exercise or defence of legal claims, such as where any person has brought a claim or serious complaint against us or you.

Sharing your information with others

25. For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. We may disclose limited personal data (including in limited cases special category or criminal data) to a variety of recipients including:

- Other employees, governors, agents and contractors (eg third parties processing data on our behalf as part of administering payroll services, the provision of benefits including pensions, IT etc – although this is not sharing your data in a legal sense, as these are considered data processors on our behalf);
- DBS and other relevant authorities and agencies such as the Department for Education, Teaching Regulation Agency (which replaced NCTL from 1st April 2018), the ICO, the Charity Commission and the local authority;
- External auditors or inspectors;
- Our advisers where it is necessary for us to obtain their advice or assistance, including insurers, lawyers, accountants, or other external consultants;

- Third parties and their advisers in the unlikely event that those third parties are acquiring or considering acquiring all or part of our School, or we are reconstituting or setting other ventures;
- When the School is legally required to do so (by a court order, government body, law enforcement agency or other authority of competent jurisdiction), for example HM Revenue and Customs, or the Police.

26. We may also share information about you with other employers in the form of a reference, where we consider it appropriate, or if we are required to do so in compliance with our legal obligations.

How long your information is kept

27. Personal data relating to unsuccessful job applicants is deleted within 6 months of the end of the application process unless you have asked us to retain this data for longer (for example, in order that we can contact you regarding any future vacancies). Notwithstanding any request for us to retain the data, all unsuccessful job applicants personal data is deleted within 2 years of the end of the application process. You may of course, ask us to delete it sooner. Where we have not proceeded with the application process due to safeguarding concerns we will retain details of the concern, your name, date of birth and address in order that we do not entertain any future applications from you.

28. For staff and governors, subject to any other notices that we may provide to you, we may retain your personal data for a period of up to 7 years after your contract of employment (or equivalent agreement) has expired or been terminated. This period of time may be varied from time to time in accordance with our P41 Data Retention Policy.

29. However, some information may be retained for longer than this, for example incident reports and safeguarding files, and data used to identify you as a specific individual such as name, date of birth, address etc, in accordance with specific legal requirements. Please refer to P41 Data Retention Policy.

30. In addition, photographs of staff and pupils and other members of the School Community, form an important part of the School archives and bring great pleasure to former staff, pupils and visitors to the school or attend school events. The school has published many of these images in its book "The History of Rydes Hill". If you do not wish your image to be retained for these, and other similar purposes, or used in future publications, please contact **Mrs Kathryn Pillar, Bursar**, via email at bursar@rydeshill.com

31. Further details regarding the School's data retention requirements can be found in P41 Data Retention Policy. If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is

considered for erasure, please contact **Mrs Kathryn Pillar, Bursar**, via email at bursar@rydeshill.com However, please bear in mind that the school will often have a lawful and necessary reasons to hold on to some personal data even following such a request.

32. A limited and reasonable amount of information will be kept for archiving purposes, for example; and even when you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a “suppression record”).

Keeping in touch and supporting the School

33. The School and FRHPS (where permission has been given) will use the contact details of former staff, governors and volunteers and other members of the school community to keep them updated about the activities of the school, or alumni and events of interest, including by sending updates and newsletters, by email and/or by post. Unless the relevant individual objects, the school and/or FRHPS (where appropriate) will also:

- Contact former staff, governors and volunteers or other members of the School community, by post and/or email in order to promote and raise funds for the school, and where appropriate, other worthy causes;
- Collect information from publicly available sources about former staff’s occupation and activities, in order to maximise the school’s fundraising potential or to publicise the school or inform the current parents and pupils or former staff, governors and vounteers or other members of the School community.
- Should you wish to limit or object to any such use, or would like further information about them, please contact **Mrs Kathryn Pillar, Bursar**, via email at bursar@rydeshill.com . You will always have the right to withdraw consent, where given, or otherwise object to this type of contact including direct marketing or fundraising. However the school is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

Your rights

34. Please see P53 Privacy Notice for Parents and Pupils which has details of your rights as a ‘data subject’, which are the same as if you were any member of the public. You can find out more about your rights under applicable data protection legislation from the Information Commissioner’s Office website available at www.ico.org.uk
35. Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how

their personal data is used, should put their request in writing to **Mrs Kathryn Pill, Bursar** via email to bursar@rydeshill.com .

36. The School will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time limits (which is 30 calendar days in the case of requests for access to information (also known as DSAR or Data Subject Access Requests). Whilst the School will aim to respond to DSARs within the statutory time limits, more complex requests may take longer for us to respond, as will DSARs made just before, or during, School holiday closures. The School will advise the requestor of any anticipated delay along with reasons why we cannot respond within the 30 calendar day time limit should this be necessary. The School has a right to charge a reasonable fee for any unreasonable or excessive requests or for producing multiple copies of information.
37. The School will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the School may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).
38. The School will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the School may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).
39. We want all our our Job Applicants, Staff, Governors and Volunteers to understand their rights under data protection legislation therefore if you require any assistance in understanding this privacy notice please contact either **Mrs Alison Packman, Compliance Officer, Mrs Kathryn Pillar, Bursar or Mrs Sarah Norville, Headmistress** who will be pleased to assist you.

Data Accuracy and Security

40. The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the Bursar of any significant changes to important information, such as contact details, held about them.
41. An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law); please see above for details of why the school may need to process your data and who you may contact if you disagree.
42. The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

This Policy

43. The School will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

Contact and Complaints

44. If you have any queries about this privacy notice or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you may contact either **Mrs Kathryn Pillar, Bursar** or **Mrs Alison Packman, Compliance Officer**.

45. If you are not satisfied with how we are processing your personal data, or how we deal with your complaint, you can make a complaint to **Mrs Sarah Norville, Headmistress** or direct to the Information Commission: www.ico.org.uk

46. The ICO does recommend that you seek to resolve any issues with the data controller (i.e. with the School) initially prior to any referral.

47. This Privacy Notice has been written based on guidance provided by ISBA, Department for Education and Farrer & Co.