



THE DEANERY

Church of England High School and Sixth Form College

Privacy Notice for Staff

The Deanery Church of England High School is 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 work relationship with us, in accordance with the General Data Protection Regulation (GDPR). It applies to all current and former employees, workers and contractors.

Who collects this information?

The Deanery Church of England High School is a 'data controller.' This means that the school is responsible for deciding how it holds and uses personal information. The school is required under data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of any contract of employment or other contract to provide services and may be updated at any time. It is important that you read this notice, together with any other privacy notice which may be provided on specific occasions when collecting or processing personal information, so that you are aware of how and why the school is using such information.

The categories of information that we collect, process, hold and share

The school may collect, store and use the following categories of personal information about you:

- Personal information and contact details, such as name, title, addresses, date of birth, marital status, phone numbers and personal email addresses
- Emergency contact information, such as names, relationship, phone numbers and email addresses
- Information collected during the recruitment process that is retained during your employment including references, proof of right to work in the UK, application form, qualifications
- Employment contract information such as start dates, hours worked, post, roles
- Education and training details
- Details of salary and benefits including payment details, payroll records, tax status information, national insurance number, pension and benefits information
- Details of any dependants
- Your nationality and immigration status and information from related documents, such as passport or other identification and immigration information
- Information in your sickness and absence records such as number of absences and reasons (including sensitive personal information regarding your physical and/or mental health)
- Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs
- Criminal records information as required by law to enable you to work with children
- Your trade union membership
- Information on grievances raised by or involving you
- Information on conduct and/or other disciplinary issues involving you
- Details of your appraisals, performance reviews and capability issues
- Details of your time and attendance records
- Information about the use of our IT, communications and other systems, and other monitoring information
- Details of your use of business-related social media
- Images of staff captured by the school's CCTV system
- Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within the school, you will be notified separately if this is to occur)
- Details in references about you that we give to others

How we collect this information

The school may collect this information from you, your personnel records, the Home Office, pension administrators, your doctors, from medical and occupational health professionals we engage, DBS, trade unions, other employees, other professionals we may engage (e.g. to advise us generally), automated monitoring of school website and other technical systems such as computer networks and connections, CCTV and access control systems, remote access systems, email and instant messaging systems, intranet and internet facilities.

How we use your information

The school will only use your personal information when the law allows it. Most commonly, the school will use your information in the following circumstances:

- To perform the contract we have entered into with you
- To comply with a legal obligation (such as health and safety legislation, under statutory codes of practice and employment protection legislation)

- Where it is needed in the public interest or for official purposes
- Where it is necessary for the school's legitimate interests (or those of a third party) and your interests, rights and freedoms do not override those interests

The school needs all the categories of information listed to allow us to perform a contract with you and to comply with legal obligations. Please note that the school may process your information without your knowledge or consent, where this is required or permitted by law.

The situations in which the school will process your personal information are listed below:

- To determine recruitment and selection decisions on prospective employees
- Effective performance of the employee's contract of employment and to maintain employment records
- Regulatory requirements compliance and good employment practice
- Vetting and screening of applicants and current staff in accordance with regulatory and legislative requirements
- Development of a comprehensive picture of the workforce and how it is deployed and managed
- Management and planning of the workforce, including accounting and auditing
- Human resources management including retention, sickness and attendance
- Performance reviews, managing performance and determining performance requirements
- Management of internal policies and procedures
- Human resources administration including pensions, payroll and benefits
- Determine qualifications for a particular job or task, including decisions regarding promotions
- Evidence for possible disciplinary or grievance processes
- Comply with legal obligations
- Monitoring and management of staff access to school systems and facilities in order to protect school networks, the personal data of employees and safeguarding
- Security of the school network and information, including preventing unauthorised access and malicious software distribution
- Education, training and development activities
- Compliance with equal opportunities legislation
- Responding to questions from insurers in respect of any insurance policies which relate to you
- Determinations regarding continued employment or engagement
- Arrangements for the termination of the working relationship
- Dealing with post-termination arrangements
- Health and safety obligations
- Prevention and detection of fraud or other criminal offences
- Defending the school in respect of any investigation or court proceedings and to comply with any court or tribunal order for disclosure

Some of the above grounds for processing will overlap and there may be several grounds which justify the school's use of your personal information. If you fail to provide certain information when requested, the school may not be able to perform the contract that has been entered into with you (such as paying you or providing a benefit) or may be prevented from complying with its legal obligations (such as to ensure the health and safety of our workers). The school will only use your personal information for the purposes for which it is collected, unless it is reasonably considered that it would need to be used for another reason which is compatible with the original purpose. If the school does need to use your personal information for an unrelated purpose, you will be notified, together with an explanation of the legal basis which allows the school to do so.

How the school use particularly sensitive information

Sensitive personal information (as defined under the GDPR as 'special category data') require higher levels of protection and further justification for collecting, storing and using this type of personal information. The school may process this data in the following circumstances:

- In limited circumstances, with your explicit written consent
- To carry out its legal obligations in line with the school's Data Protection policy
- Where it is needed in the public interest, such as for equal opportunities monitoring (or in relation to the pension scheme)
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.
- Less commonly, where it is needed in relation to legal claims or to protect your interests (or someone else's interests) and you are not capable of giving your consent

The school will use this information in the following ways:

- Collecting information relating to leave of absence, which may include sickness absence or family related leave
- To comply with employment and other laws

- Collecting information about your physical or mental health, or disability status, to ensure your health and welfare in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to manage sickness absence and to administer benefits
- Collecting information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting
- To record trade union membership information to pay trade union premiums and to comply with employment law obligations

Criminal convictions

The school may only use information relating to criminal convictions where the law allows, which will usually be where it is necessary to carry out its legal obligations. The school will only collect information about criminal convictions if it is appropriate given the nature of the role and where the school are legally able to do so. Where appropriate the school will collect information about criminal convictions as part of the recruitment process or may be notified of such information directly by you in the course of your employment.

Automated decision making

Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention. The school is allowed to use automated decision making in the following circumstances:

- Where you have been notified of the decision and given 21 days to request a reconsideration
- Where it is necessary to perform the contract with you and appropriate measures are put in place to safeguard your rights
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless the school has a lawful basis for doing so and you have been notified.

Sharing data

The school may need to share your data with third parties, including third party service providers where required by law, where it is necessary to administer the working relationship with you or where the school has another legitimate interest in doing so. These include the following:

- Department for Education (DfE)
- Ofsted
- Prospective employers
- Welfare services (such as social services)
- Law enforcement officials such as police
- HMRC
- LADO
- Training providers
- Professional advisors such as lawyers and consultants
- Support services (including HR support, insurance, IT support, information security, pensions and payroll)
- Local Authority
- Occupational Health
- Disclosure & Barring Service (DBS)
- Recruitment and supply agencies

Information will be provided to those agencies securely or anonymised where possible. The recipient of the information will be bound by confidentiality obligations. The school requires them to respect the security of your data and to treat it in accordance with the law. The school may transfer your personal information outside the EU. In those cases, you can expect a similar degree of protection in respect of your personal information.

Retention periods

Except as otherwise permitted or required by applicable law or regulation, the school only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for personal data, the school considers the amount, nature, and sensitivity of personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for processing the personal data, whether we can fulfil the purposes of processing by other means and any applicable legal requirements. Once you are no longer an employee, we will retain and securely destroy your personal information in accordance with our Data Retention policy. The school typically retains personal data for 6 years subject to any exceptional circumstances or to comply with laws or regulations that require a specific retention period.

Security

The school has put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). In addition, the school limits access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. Details of these measures are available T: Staff Shared Drive: GDPR. Third parties will only process your personal information on the school's instructions and where they have agreed to treat information confidentially and to keep it secure. The school has put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Your rights of access, correction, erasure and restriction

It is important that the personal information held about you is accurate and current. Please keep the school informed if your personal information changes during your employment. Under certain circumstances by law, you have the right to:

- Access your personal information (commonly known as a 'subject access request'). This allows you to receive a copy of the personal information and check that it is being lawfully processed. You will not have to pay a fee to access your personal information. However, the school may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, the school may refuse to comply with the request in such circumstances
- Correction of the personal information. This enables you to have any inaccurate information held about you corrected
- Erasure of your personal information. You can ask the school to delete or remove personal data if there is no good reason for it to continue to be processed
- Restriction of processing your personal information. You can ask the school to suspend processing personal information about you in certain circumstances, e.g., if you want to establish its accuracy before processing it
- To object to processing in certain circumstances, e.g. direct marketing purposes
- To transfer your personal information to another party

If you want to exercise any of the above rights, please contact the Director of Business & Finance in writing. The school may need to request specific information from you to confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Director of Business & Finance. Once the school has received notification that you have withdrawn your consent, it will no longer be processed for the purpose or purposes originally agreed to, unless there is another legitimate basis for doing so in law.

How to raise a concern

You should raise a concern to the Director of Business & Finance in the first instance.

Contact

If you would like to discuss anything within this privacy notice or have a concern about the way the school is collecting or using your personal data, you should raise your concern with the Director of Business & Finance in the first instance.

Or alternatively in writing to: [The Deanery Church of England High School, Frog Lane, Wigan, WN1 1HQ](mailto:The.Deanery.Church.of.England.High.School.Frog.Lane.Wigan.WN1.1HQ).

You should address all correspondence relating to a 'concern' with the heading **CONCERN** followed by your name.

The school has appointed a Data Protection Officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how the school handles your personal information which cannot be resolved by the Director of Business & Finance, then you can contact the DPO on the details below: -

Data Protection Officer Name: Craig Stilwell

Data Protection Officer Details: [Judicium Consulting Ltd, 72 Cannon Street, London, EC4N 6AE](mailto:Judicium.Consulting.Ltd.72.Cannon.Street.London.EC4N.6AE)

Data Protection Officer Email: dataservices@judicium.com

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues at <https://ico.org.uk/concerns>.

Changes to Privacy Notices

The school reserves the right to update privacy notices at any time and will provide you with a new privacy notice when substantial updates are made. The school may also notify you in other ways from time to time about the processing of your personal information.