



Privacy Notice for Reed's Staff, Other Staff & Volunteers

1. Introduction

1.1 Reed's School is a registered educational charity based in Cobham, charity number 312008. For the purposes of the Data Protection Law, Reed's School (the School) is a data controller.

1.2 In the course of your employment, engagement or other basis of work undertaken for the School, 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.

1.3 This Privacy Notice applies to personal data held and used ("processed") by the School about Reed's staff, other staff, contractors, itinerant teachers, casual workers, temps and volunteers who may be employed or engaged for the School to work for it in any capacity, as well as prospective applicants for roles.

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

1.5 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 CCTV and biometrics policies;
- the School's retention of records policy;
- the School's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded (both by and about staff); and
- the School's IT policies, including its Acceptable Use policy.

1.6 Please note that your contract with the School, including any document or policy forming a part of your contractual obligations to the School, may be relevant to and supplement the information in this Privacy Notice, in 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 Privacy Notice is the primary document applicable to the use of your personal data by the School.

2. How the School collects personal data

2.1 The School may collect your personal data in a number of ways, for example:

- from the information you provide to us before or whilst making a formal job application, for example when you come for an interview, and the information that you provide 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.

2.2 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;
- in the course of fulfilling your employment (or equivalent) duties and as part of performance appraisals; and
- in various other ways as you interact with us during your time as a member of staff, and afterwards, where relevant.

3. The types of information we collect

3.1 We may collect the various types of personal data about you (and your family members and 'next of kin', where relevant). This will include by way of example:

- contact and communications information, including your contact details, records of communications, and contact details for your '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);
- biographical, educational and social information, including your basic personal details, your photo for work purposes, details of your education, your interests and extra-curricular activities;
- financial information, including your bank account details (used for paying you), and information related to pensions, national insurance, employee benefits, tax status and, where relevant, Gift Aid declarations;
- work-related information, including details of your work history and employer references, information relating to your work at the School including performance appraisals and correspondence, your involvement with or membership of sector bodies and professional associations and information about your employment and professional life after leaving the School, where relevant; and
- any other information relevant to your employment or other engagement with the School.

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

- 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);
- biometric information, for example where necessary for school security systems;
- information about certain criminal convictions (for example, where this is necessary for due diligence purposes, or compliance with our legal and regulatory obligations); and
- information concerning your racial or ethnic origin or sexual orientation (only in the course of investigating complaints made by you or others, for example concerning discrimination).

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.

4. How the data is used and the lawful bases for processing

4.1 *Entering into, or fulfilling, our contract with you*

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 prior to entering into a contract. 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;
- 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 you create while 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.

4.2 *Legitimate Interests*

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 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:

- for security purposes, including by operating security cameras in various locations on the School's premises;
- 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 and to safeguard pupils' welfare and provide appropriate pastoral care;
- to carry out or cooperate 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 '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; and
- to monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's IT: acceptable use policy and government guidance such as KCSIE.

4.3 Legal Obligations

We also process your personal data for our compliance with our legal and regulatory obligations. In this respect, we use your personal data for the following:

- to meet our legal obligations (for example, relating to child welfare, social protection, 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; and
- for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

4.4 Special categories of data

We will process special categories of personal data for lawful reasons only, including where it is necessary to protect your or another person's vital interests; where it is necessary for some function in the substantial public interest, including the safeguarding of children; or where it is necessary for the establishment, exercise or defense of legal claims. In circumstances where consent is appropriate, this processing will be done only where you have given us your explicit consent to do so.

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:

- 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;
- categories of your personal data which are relevant to investigating complaints made by you or others, for example concerning discrimination, bullying or harassment; and
- 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).

5. Sharing your information with others

5.1 We may share your personal data with certain third parties for the purposes referred to in this privacy notice. We may disclose limited personal data (including in limited cases special category or criminal data) to a variety of recipients including:

- other agents and contractors (e.g. third parties processing data on our behalf as part of administering the provision of benefits including pensions, IT systems etc. Although this is not sharing your data in a legal sense, as these are considered data processors on our behalf and are as such subject to contractual assurances that personal data will be kept securely and used only in accordance with the School's specific directions);

- companies or organisations providing educational resources or services (e.g. public exam boards, school trip providers and extra curricular providers such as the Duke of Edinburgh award scheme);
- professional advisers and independent panel members appointed by the School where it is necessary for us to obtain their advice or assistance (e.g. 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;
- appropriate regulatory bodies and external auditors (e.g. the Independent Schools Inspectorate and the Charity Commission);
- government authorities (e.g. HMRC, DfE, the DBS, police and the local authority).

5.2 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.

6. How long your information is kept

6.1 Personal data relating to unsuccessful job applicants is deleted within one year except where we have notified you that we intend to keep it for longer (and you have not objected).

6.2 For employees, subject to any other notices that we may provide to you, we will typically retain your personal data for a period of seven years after your contract of employment (or equivalent agreement) has expired or been terminated; however, some information may be retained for longer than this in accordance with specific legal requirements, for example incident reports or information that may be relevant to safeguarding cases.

6.3 Please see our Retention of Records Policy for further information.

7. Data accuracy and security

7.1 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 please notify the Human Resources Manager of any significant changes to important information held about them, such as contact details.

7.2 The School will take appropriate technical and organisational steps to protect the personal data about individuals, including policies around the use of technology and devices, and access to school systems. All staff will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

8. Your rights

8.1 Individuals have various rights under Data Protection Law to access and understand personal data about them held by the School, and in some cases ask for it to be erased or amended or have it transferred to others, or for the School to stop processing it. These rights are subject to certain exemptions and limitations.

8.2 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 the Human Resources Manager.

8.3 The School will endeavour to respond to any such requests as soon as is reasonably practicable and within statutory time-limits (which is one month in the case of requests for access

to information). We 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).

8.4 The limitations and exemptions to these rights are as follows. The right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals or information which is subject to legal privilege. We will sometimes have compelling reasons to refuse specific requests to delete or stop processing your personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. Where the School is relying on consent as a means to process personal data, any person may withdraw this consent at any time.

9. This policy

9.1 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. Minor changes will be made as needed, with the latest version always being available on Firefly.

10. Contact and complaints

10.1 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 the Human Resources manager at HR@reeds.surrey.sch.uk.

10.2 If you are not satisfied with how we are processing your personal data, you should utilise the School's grievance procedure and also notify the Privacy Officer, at privacyofficer@reeds.surrey.sch.uk. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns/>, although the ICO recommends that steps are taken to resolve the matter with the school before involving the regulator.

Compiled by: Privacy Officer	Revision Number: 3 (Summer Term 2020)
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