

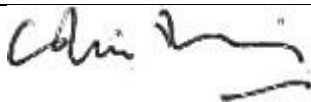


**MOUNT HOUSE
SCHOOL**

INSPIRING EVERY INDIVIDUAL

SCHOOL POLICIES

DATA PRIVACY NOTICE EMPLOYEE

Review	Date	By
Last Reviewed	February 2021	
Next Review	February 2022	

The data controller processing your data is Mount House School. We are registered as a data controller with the Information Commissioner's Office (our notification number is ZA271489) and we are committed to ensuring that the personal data we process is handled in accordance with data protection legislation. The first point of call for any queries you may have with regards data protection is the school Bursar. This Data Privacy Notice should be read in conjunction with the school's Data Protection Policy, and Job Applicant Data Privacy Notice.

1. What information do we collect from you?

The school holds and processes personal data about current and former members of staff, including the Directors, full-time and part-time employees, temporary workers, supply staff, contractors, volunteers, peripatetic staff and coaches, students on placement, and staff and students visiting from other schools making use of the school's facilities. We only collect the data we need, and keep that data up to date. The personal data that we hold about you consists of:

- Personal information – your name, date of birth, gender, nationality, national insurance number, copies of documentation proving your right to work such as your passport or visa, identifiers issued by public bodies (e.g. NI Number, employee number and username) and your contact details.
- Information about your job and contract of employment - your role, title and department, information about your employment contract such as start date/s, hours, contract type (for example, fixed term, permanent, temporary etc.), your salary, information about any benefits you receive, and details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals.
- Information relating to your performance in your role - assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans, promotions, details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence.
- Education and work history - details of your qualifications, skills, experience and employment history and references received.
- Family, lifestyle and social circumstances - In certain circumstances we will also hold limited information about your spouse, partner, or civil partner, or other individuals. This is collected where you name them as an emergency contact or where shared parental leave is requested - in which case we will receive the spouse/partner's name and the name of their employer either from you or from your spouse/partner's employer.

The school may process some information about you that is classed as 'special category' data, and which receives additional protections. For further information, please contact the school Bursar and request a copy of the school's Data Protection Appropriate Policy Document.

We may collect the following special category data:

- Details of periods of leave taken by you relating to sickness absence, family leave, etc.
- Health or disability information about you.
- Information about your religion or beliefs.
- Information about your ethnic origin.
- Your sexual orientation.
- Gender identification.
- Trade union affiliations, where applicable.
- Criminal offence information.

For certain roles, other sensitive information may be processed, such as information about past criminal convictions, working with children or vulnerable adults, and your fitness to practise in certain regulated professions.

2. How do we collect this information from you?

We receive this data directly from you from a variety of different sources, depending on how and where you interact with the school. We receive a lot of this data from you when you:

- Apply for a job at the school.
- Complete your new starter and payroll forms.
- Supply your passport or other identity documents at the start of your employment, at other times when necessary during your employment with us, or when we ask you to confirm your identity.
- Update your personal record during your employment or ask us to update your record in any way.
- Supply emergency contact details, in which case we will assume that the person whose details you give us are happy for these details to be shared with us by you.
- Request shared parental leave, in which case we will receive the spouse/partner's name and the name of their employer either from you or from your spouse/partner's employer.
- At various other times when you share it during the course of your employment, for example, during correspondence with you, during the annual appraisal process, if you need to take sick leave, or if your role changes.

If we do not receive information directly from you, we either generate it ourselves (such as your school employee ID and username), or we receive it from third parties. Data about you that we receive from third parties comprises your employment references, tax details, results of criminal records checks, medical information and details of voluntary salary deductions. We receive this information from the following third parties:

- Professional or education organisations which you may have named as a referee.
- Individuals who you may have named as a referee.

- HM Revenue and Customs (HMRC).
- Pensions scheme providers.
- Disclosure and Barring Service.
- In some cases, third parties carrying out pre-employment checks.

3. Why do we collect this information?

We take our obligations around the handling of data very seriously, and it is therefore important for you to know the various lawful bases that we rely on for the processing of your personal data. We process some of your data in order to enter into and to **fulfil a contract of employment with you**, or to **meet a relevant legal obligation** under employment law or other legislation. We process your personal data under these legal bases when we:

- provide you with a contract of employment.
- administer HR-related processes, including those relating to performance management, conduct and promotion.
- operate and keep a record of disciplinary, complaint and grievance issues to ensure acceptable conduct in the workplace
- ensure you are legally eligible to work in the UK.
- calculate your pay, including any statutory or voluntary deductions (such as to a pension scheme, salary sacrifice scheme or trade union).
- ensure that you are able to practice in a particular role.
- ensure that you are physically fit to work or practice in a particular role.
- identify and prevent any potential risks to your health or wellbeing that may arise from your work and ensure you are suitably trained.
- process and pay your statutory and occupational payments for relevant periods of absence or leave, such as when you are unable to work due to illness.
- administer pension and benefit entitlements.
- ensure we can get in touch with you if we need to regarding work or employment related matters.
- compile statistics for regulatory and statutory reporting purposes (for example our annual returns to HESA or the Office for National Statistics).

In other circumstances, the school processes your data because we feel it is in our legitimate interest to do so. Legitimate interests are determined through an assessment made by weighing our requirements against the impact of the processing on you. Our legitimate interests will never override your right to privacy and the freedoms that require the protection of your personal data. We process your data in our legitimate interests when we:

- provide you with a school ID card, access to a school email account, and give you personalised access to buildings, IT applications, resources and network services such as WiFi.
- monitor use of IT services to ensure adherence to the school's IT Acceptable Use Policy.

- provide you with access to training and development services.
- produce statistics for internal reporting to ensure the effective management of our workforce. Analysis of statistics is carried out at an aggregate level and does not identify you directly.
- enable effective communications with you regarding information you need to know for campus security or operations.
- enable effective communications with you about the school in relation to news and updates.
- provide opportunities for employee wellbeing and support, such as counselling services.
- contact those people you have named to be notified in the event of an emergency.
- operate and keep a record of employee performance and related processes to plan for career development, succession planning and workforce management purposes.
- use your data to analyse the effectiveness of a service that we provide, such as our annual staff survey. This analysis is carried out at an aggregate level so that you are not identifiable from the data.
- ensure that we can keep the school site safe and secure. This involves capturing images of you in our CCTV system. Please contact the Bursar for more information about how your data is processed within the CCTV system.

Some special category data is processed to carry out our obligations and exercise specific rights in relation to employment. We process information about ethnic origin, sexual orientation, religion or belief or trade union membership, offences and alleged offenses, criminal offences, gender identification, health information to carry out our employment obligations when we:

- make reasonable adjustments for staff who have a disability.
- ensure that you are fit to work in a particular role.
- meet our obligations under the employment law such as the Equality Act 2010.
- manage voluntary salary deductions to a trade union, where applicable.
- for some roles, we are obliged to seek information about criminal convictions and offences.

Vital interests - On rare occasions, we may need to process and share information about you, including special category information, in the event of an emergency because it is in the vital interest of you or another person that we do so, and you are physically or legally unable to give us your consent.

We process for statistical purposes or with your consent when we produce statistics for equal opportunity initiatives or to make regulatory returns. Data that we use for these purposes is anonymised or is collected with your consent. You are free to decide whether or not to provide this data and there are no consequences if you choose not to provide it.

Some special category data is processed for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee. We process for this reason when we obtain occupational health advice, to ensure that we comply with our duties in relation to individuals with disabilities. This assessment is carried out by external health professionals on behalf of the school.

Your information may be shared internally with members of the HR and Finance teams, your line manager, managers in the business area in which you work, and IT, and Site Staff if access to the data is necessary for performance of their roles. We combine the data you provide us with other data generated during your employment in order to maintain a summary record of your employment with us.

We also combine your data with data received from the third parties listed above in order to:

- Determine whether you are eligible to work in the UK.
- Ensure that you pay the correct tax and National Insurance contribution.
- Ensure you receive any pension payments you are due once you are eligible.

Access to, and the sharing of, your special category data are controlled very carefully. You will be given further details about our need for collecting such data when we ask you to share it with us, including any consequences for you of not providing it.

4. How long do we keep your information?

We will keep your information for a maximum period of 25 years after the end of your employment with the school. In many cases, data will be kept for a shorter period of 7 years after the end of your employment. For more information please refer to the school's data retention schedule, available from the HR Administrator.

Once it is no longer required for business purposes, core details of your employment with us (your name, details about your job such as contract type and the role titles you have held during your time with us) will be securely transferred to the school archives for permanent preservation so that it can be made available for future historical research enquiries. All relevant safeguards are met in relation to this archival processing.

All other data we hold about you, electronically and in paper format, will be permanently destroyed.

5. Who do we share your information with?

Within the school, we share your data with:

- The Finance team and external Payroll bureau in order to pay your monthly salary and any expenses and to enrol you in a pension scheme and ensure appropriate contributions can be made.
- The Health and Safety team, in order to maintain statutory records regarding any accidents or hazardous exposure you sustain at work
- IT Services in order to provide you with an IT account, email address and access to relevant buildings, IT networks, systems and resources

We also share your personal data, where required, with the following external third parties:

- Government departments and agencies where we have a statutory obligation to provide information (e.g. Her Majesty's Revenue and Customs (HMRC), the Independent Schools Inspectorate (ISI), the Independent Schools Council (ISC), the Home Office (in connection with UK visas and immigration), and Office for National Statistics
- Our pension scheme providers in order to enrol you into a pension scheme and ensure contributions are paid correctly
- The Disclosure and Barring Service (DBS) where we need to make a criminal records check for certain roles
- On occasion and where necessary, the police and other law enforcement agencies
- On occasion and where necessary, appointed external auditors

We will provide references about you to external enquirers or organisations where you have requested or indicated that we should do so.

6. Data Processing during the Covid-19 outbreak.

Following the outbreak of Covid-19, the school is required to collect and process new types of information about individuals (students, parents, staff, visitors and other family members of all these), including whether individuals are displaying symptoms of the virus, the health status of individuals within the same household, the results of any Covid-19 testing, and the various locations individuals have visited since the outbreak started. For further detail regarding the school's obligations regarding this data under current data protection legislation, please see the school Data Protection Policy Appendix 1.

7. How do we protect your data?

We take the security of your data seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions contained within a contract, are under a duty of confidentiality

and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

8. What rights do you have in relation to the way we process your data?

As a data subject, you have a number of rights. You can:

- Ask to access (i.e. have a copy) that data as well as to be provided with supplemental information about the processing (by making a subject access request)
- Require us to change incorrect or incomplete data
- Require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- Object to the processing of your data where we rely on our legitimate interests as the legal ground for processing
- Receive from us the personal data we hold about you which you have provided to us in a reasonable format specified by you, including for the purpose of you transmitting that data to another data controller
- Ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the school's legitimate grounds for processing data
- Withdraw your consent for us to process your data where we do so with your consent

Not all of these rights apply in all circumstances. If you would like to exercise any of these rights, please contact us. You can make a subject access request by completing the school's subject access request form, available from the Bursar.

If you continue to have concerns about the use of your personal data, the Information Commissioner's Office is an independent body set up to uphold information rights in the UK. They can be contacted through their website: www.ico.org.uk, or their helpline on 0303 123 1113, or in writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

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