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| **St Michael’s Catholic Grammar School** |  |

**Privacy notice for staff**

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing ‘privacy notices’ (sometimes called ‘fair processing notices’) to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our school. This notice does not form part of any contract of employment or other contract to provide services.

We, St Michael’s Catholic Grammar School, Nether Street, North Finchley, London N12 7NJ, are the ‘data controller’ for the purposes of data protection law.

Our data protection officer is Mr Hinnem (see ‘Contact us’ below).

**The personal data we hold**

We process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

* Your name
* Contact details
* Date of birth, marital status and gender
* Next of kin and emergency contact numbers
* Salary, annual leave, pension and benefits information
* Bank account details, payroll records, National Insurance number and tax status information
* Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
* Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
* Performance information
* Outcomes of any disciplinary and/or grievance procedures
* Absence data
* Copy of driving licence
* Photographs
* Data about your use of the school’s information and communications system
* CCTV images/footage

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

* Race, ethnicity, religious beliefs, sexual orientation and political opinions
* Trade union membership
* Health, including any medical conditions, and sickness records

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences. We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

**Why we use this data**

The purpose of processing this data is to help us run the school, including to:

1. Enable you to be paid
2. Check your entitlement to work in the UK
3. Determine the terms on which you work for us
4. Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
5. Support effective performance management
6. Inform our recruitment and retention policies
7. Allow better financial modelling and planning
8. Enable equalities monitoring
9. Improve the management of workforce data across the sector
10. Support the work of the School Teachers’ Review Body
11. Make sure our information and communications systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely
12. Ascertain your fitness to work
13. Manage sickness absence

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**Use of your personal data for filtering and monitoring purposes**

While you are in school, we may monitor what material you access on our computers and other IT and communication systems. We do this so that we can:

* Comply with health and safety law and other laws
* Comply with our policies (e.g. child protection policy, IT acceptable use policy)
* Keep our network(s) and devices safe from people who aren’t allowed to access them, and prevent harmful software from damaging our network(s)
* Protect your welfare

**Our lawful basis for using this data**

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

* Fulfil a contract we have entered into with you
* Comply with a legal obligation
* Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

* You have given us consent to use it in a certain way
* We need to protect your vital interests (or someone else’s interests)
* We have legitimate interests in processing the data

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school’s use of your data.

**Our lawful basis for using special category data**

For ‘special category’ data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

* We have obtained your explicit consent to use your personal data in a certain way
* We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
* We need to protect an individual’s vital interests (i.e. protect your life or someone else’s life), in situations where you’re physically or legally incapable of giving consent
* The data concerned has already been made manifestly public by you
* We need to process it for the establishment, exercise or defence of legal claims
* We need to process it for reasons of substantial public interest as defined in legislation
* We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
* We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
* We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

* We have obtained your consent to use it in a specific way
* We need to protect an individual’s vital interests (i.e. protect your life or someone else’s life), in situations where you’re physically or legally incapable of giving consent
* The data concerned has already been made manifestly public by you
* We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
* We need to process it for reasons of substantial public interest as defined in legislation

**Collecting this information**

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

* Local authorities
* Government departments or agencies
* Police forces, courts, tribunals

**How we store this data**

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with the limits on retaining records as set out in the government guidance: [*Information and Records Management Society’s toolkit for schools*](http://irms.org.uk/?page=schoolstoolkit&terms=%22toolkit+and+schools%22)

**Data sharing**

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

* Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns
* The Department for Education
* Ofsted and Catholic Education Service
* Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll
* Financial organisations
* Central and local government
* Our auditors
* Survey and research organisations
* Trade unions and associations
* Health authorities
* Security organisations
* Health and social welfare organisations
* Professional advisers and consultants
* Charities and voluntary organisations
* Police forces, courts, tribunals
* Professional bodies
* Employment and recruitment agencies

**Transferring data internationally**

Where we share data with an organisation that is based outside the UK, we will protect your data by following UK data protection law.

**Your rights**

**How to access personal information we hold about you**

You can find out if we hold any personal information about you, and how we use it, by making a **‘subject access request’**, as long as we judge that you can properly understand your rights and what they mean.

If we do hold information about you, we will:

* Give you a description of it
* Tell you why we are holding and using it, and how long we will keep it for
* Explain where we got it from, if not from you or your parents
* Tell you who it has been, or will be, shared with
* Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
* Give you a copy of the information

You may also ask us to send your personal information to another organisation electronically in certain circumstances.

If you want to make a request please contact our data protection officer.

**Your other rights over your data**

Under data protection law, you have certain rights regarding how your personal information is used and kept safe. For example, you have the right to:

* Say that you don’t want your personal information to be used
* Object to the processing of personal data that is likely to cause, or is causing, damage or distress
* Stop it being used to send you marketing materials
* Say that you don’t want it to be used for automated decisions (decisions made by a computer or machine, rather than by a person)
* In some cases, have it corrected if it’s inaccurate
* In some cases, have it deleted or destroyed, or restrict its use
* Withdraw your consent, where you previously provided consent for your personal information to be collected, processed and transferred for a particular reason
* In some cases, be notified of a data breach
* Make a complaint to the Information Commissioner’s Office (ICO) if you feel we have not used your information in the right way
* Claim compensation if the data protection rules are broken and this harms you in some way

We may refuse your information rights request for legitimate reasons, which depend on why we’re processing it. Some rights may not apply in these circumstances:

* Your right to have all personal data deleted or destroyed doesn’t apply when the lawful basis for processing is legal obligation or public task
* Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests
* Right to object to the use of your private data doesn’t apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don’t have the right to object, but you have the right to withdraw consent

**Complaints**

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we’ve done something wrong.

You can make a complaint at any time by contacting our data protection officer.

You can also complain to the Information Commissioner’s Office in one of the following ways:

* Report a concern online at <https://ico.org.uk/concerns/>
* Call 0303 123 1113
* Or write to: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

**Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer:

* Mr Hinnem