



# The Tiffin Girls' School

## Privacy Notice - School Workforce

REVISED NOVEMBER 2021

### Introduction

1. This privacy notice advises the school workforce of the school's data protection responsibilities on the collection, storage and use of personal data about individuals we employ, or otherwise engage to work at The Tiffin Girls' School (the School).
2. The School is committed to being transparent about how we collect and use personal data and to meeting our data protection obligations.
3. The School is required to explain how and why we collect personal data and what we do with that information. This privacy notice will also provide information as to what you can do about your personal information that is held and processed by us.
4. For the purposes of this privacy notice, 'the school workforce' includes, but is not limited to:
  - Employees with a permanent, fixed-term, temporary or casual contract, including but not limited to:
    - Leisure Assistants
    - Foreign Language Assistants
    - Invigilators
  - Self-employed service providers:
    - Visiting music teachers
    - Sports coaches
  - Agency staff
  - PGCE students
  - Support Workers, e.g. Health Link Worker
  - Contractors – where the school holds dates of and certificate numbers, and any disclosures made on individual Disclosure and Barring Service certificates
  - Consultants
5. We, The Tiffin Girls' School, Richmond Road, Kingston upon Thames, KT2 5PL, are the 'data controller' for the purposes of UK data protection law.
6. The Data Protection Officer is Emma Kilburn, Deputy Headteacher. Ms Kilburn can be contacted at [dataprotection@tiffingirls.org](mailto:dataprotection@tiffingirls.org).
7. This privacy notice should be read in conjunction with the following documents
  - Data Protection Policy
  - Records Management Policy
  - Online Safety Policy

## **The personal data held by the School**

8. The School collects and processes data relating to those we employ, or otherwise engage, to work at or be engaged by our school. Personal data is any information that relates to you and can be used directly or indirectly to identify you. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:
  - Contact details (name, address, email, telephone)
  - Date of birth, marital status, gender
  - Next of kin and emergency contact numbers
  - Salary, pay progression, annual leave, pension and benefits information (e.g. maternity, paternity, sickness)
  - Bank account details, payroll records, National Insurance number and tax status information
  - Recruitment information, including copies of right to work documentation (passport, birth certificate, driving licence, permits, visas), 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
  - DBS certificate numbers, dates and any disclosures made
  - Performance information
  - Outcomes of any disciplinary and/or grievance procedures
  - Absence information (such as number of absences and reasons)
  - Copy of driving licence (if driving on behalf of the school)
  - Data about your use of the school's information and communications system
  - Relationships (and the nature where applicable) to any members of staff or governors
  - Information relating to safeguarding (e.g. allegations of abuse, including low level)
  
9. The School 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):
  - Ethnicity, religious or philosophical beliefs, sexual orientation and political opinions
  - Trade union membership
  - Photographs and CCTV images captured in school
  - Health, including any medical conditions, and sickness records
  - Disability, including any records for reasonable adjustments
  
10. The School may also collect, use, store and share (when appropriate) information about criminal convictions and offences.
  
11. The School may also hold data about you received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

## **Why the School collects and processes workforce data**

12. The School processes this data for employment purposes to assist in the running of the School, including to:
  - Enable you to be paid
  - Manage the employment relationship of those who are engaged to work or perform services for the School

- Facilitate safe recruitment, as part of our safeguarding obligations towards students
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring in accordance with the Equality Act
- Ensure reasonable adjustments can be made for disabled employees
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body
- Enable the development of a comprehensive picture of the workforce and how it is deployed

**13.** The School does not currently process any personal data through automated decision making or profiling. If this changes in the future, any relevant privacy notices will be amended in order to explain the processing to you, including your right to object to it.

### **The School's lawful basis for using this data**

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

- a) Fulfil a contract we have entered into with you
- b) Comply with a legal obligation
- c) Carry out a task in the public interest

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

- d) We need to protect the individual's vital interests (or someone else's interests).

**16.** Your consent is not required when the lawful basis for using your personal data is a), b), c) or d) above.

**17.** We may also use personal information about you where you have given the School consent to use it in a certain way, for example, use of a photo on one of the School's twitter accounts.

**18.** 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.

**19.** 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 this data.

**20.** Some special categories of personal data, such as information about health or medical conditions, are processed to comply with employment law and health and safety obligations (such as those in relation to disabled employees.)

**21.** The School also processes other special categories of personal data, such as information about ethnic origin, or religion or belief. This is done for the purposes of equal opportunities monitoring and in accordance with its Public Sector Equality Duty in accordance with the Equality Act.

**22.** Some of the reasons special category data on the school workforce is processed include:

- Legal claims. The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisers and insurers.
- For equal opportunities monitoring.
- For medical reasons to ensure that we comply with our health and safety obligations to you

## **Collecting this data**

23. Whilst the majority of information the School collects from you is mandatory, there is some information that can be provided voluntarily.
24. 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.
25. The School collects information in a variety of ways, for example, through:
  - Application forms, CVs or covering letters
  - Your passport or other identity documents, such as your driving licence
  - From third parties such as the DBS in carrying out safeguarding checks, references supplied by former employers
  - Forms completed by you at the start of or during your employment or engagement with us
  - Correspondence with you or, where relevant, with a recruitment agency
  - Interviews, meetings or other assessments
26. Most of the data the School holds about you will come from you, but the School may also hold data about you from:
  - Local authorities
  - Government departments or agencies
  - Police forces, courts, tribunal
  - Recruitment Agencies

## **Storing this Data**

27. We create and maintain an employment or contractor file for each member of the school workforce. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.
28. Once your employment or contract relationship with us has ended, we will retain this file and delete the information in it in accordance with our Records Retention Schedule, a copy of which is available from the Data Protection Officer.
29. The School has put in place appropriate security measures to prevent your personal information from being accidentally lost, accidentally destroyed, used or accessed in an unauthorised way, altered or disclosed.
30. Where the School engages third parties to process personal data on its behalf, they do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data. For example, the School ensures encrypted devices, passwords, virus protection and appropriate firewalls are utilised.

## **Data Sharing**

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

- 32.** Where it is legally required, or necessary (and it complies with UK data protection law) we may share personal information about you with:
- Other members of staff – in order for them to perform their roles, e.g. Senior Leadership Team, Governors, HR, your line manager.
  - The Disclosure and Barring Service – to meet our legal obligations for safer recruitment
  - Our Local Authority (LA) – to meet our legal obligations to share certain information, such as safeguarding concerns. The school's LA is the Royal Borough of Kingston.
  - The Department for Education (DfE) – to meet our legal obligations to share certain information, such as school workforce census, Ofsted – to enable them to meet their obligations when conducting an inspection
  - Our auditors – to enable them to meet their obligations to conduct internal and external audits of the school's financial management system and accounts.
  - Suppliers and service providers – to enable them to provide the service we have contracted them for, e.g. IT services provider, payroll agency, pension providers, occupational health services, ParentMail, photographer for staff photos on the School Management Information System, online appraisal system, survey and research organisations. Access to personal data will only be granted to a provider that has demonstrated compliance with the GDPR
  - Insurance provider – we may need to share some information to ensure we maintain cover or to process any claims
  - Health and social welfare organisations – we may need to share information about you with those who have responsibility for student welfare
  - Professional advisers and consultants – we might need to share staff information in order to assist us in the running of the school, if this is relevant to their work
  - Police forces, courts, tribunals – sometimes we need to share information with the police or our legal advisers to help with an inquiry, e.g. safeguarding issues or injuries
  - Third-parties in the context of a TUPE transfer
  - Professional bodies – to participate in their educational provision, e.g. SSAT, training providers

### **Transferring data internationally**

- 33.** With cloud-based storage and some other services sometimes being supplied outside the UK, personal data can be sent to other jurisdictions.
- 34.** Where we transfer personal data to a third party country or territory, we will do so in accordance with UK data protection law.
- 35.** Our servers and storage systems are based in the UK and we have ensured that appropriate safeguards are in place to protect your personal data.

### **Your rights regarding personal data**

- 36.** Individuals have a right to make a subject access request to gain access to personal information that the School holds about them.
- 37.** Under UK data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:
- Object to the use of your personal data
  - Prevent your data being used to send direct marketing

- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
  - In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
  - In certain circumstances, be notified of a data breach
  - Make a complaint to the Information Commissioner's Office
  - Claim compensation for damages caused by a breach of the data protection regulations
- 38.** To exercise any of these rights, please get in touch with our Data Protection Officer. See below for contact information.
- 39.** If you have a concern about the way we are collecting or using your personal data, please raise your concern with the School in the first instance by contacting our Data Protection Officer. We take any complaints about our collection and use of personal information very seriously.
- 40.** Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/make-a-complaint/> or call 0303 123 1113 or write to ICO, Wycliffe House, Water lane, Wilmslow, Cheshire, SK9 5AF

### Contact us

- 41.** If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer:

Emma Kilburn  
Deputy Headteacher and Data Protection Officer  
The Tiffin Girls' School  
Richmond Road  
Kingston upon Thames  
Surrey KT2 5PL

Tel: 020 8546 0773

Email: [dataprotection@tiffingirls.org](mailto:dataprotection@tiffingirls.org)