

BRYANSTON

PRIVACY NOTICE PART B - EMPLOYEES AND GOVERNORS

WHAT THIS NOTICE IS FOR

This Privacy Notice intended to provide information about how Bryanston will use (or "process") Personal Data about its current, past and prospective employees, governors and volunteers/residents (referred to in this Notice as "employees").

This information is provided in accordance with the rights of individuals under data protection law to understand how their Personal Data is used.

This Privacy Notice applies alongside **Bryanston's Privacy Notice Overview Part A** and any other information the School may provide about a particular use of Personal Data, for example when collecting data via our online or paper application forms.

This Privacy Notice also applies in addition to the Bryanston's other relevant terms and conditions and Policies, including:

- the Contract or Terms of Engagement between the School and the employee;
- the School's policy on taking, storing and using images of children;
- the School's CCTV and/or Biometrics Policy;
- the School's Records Management Policy;
- the School's Safeguarding, Pastoral, or Health and Safety Policies, including as to how concerns or incidents are recorded; and
- the School's IT Policies.

Anyone who works for, or acts on behalf of, Bryanston (including staff, volunteers, governors and service providers) should also be aware of and comply with the applicable parts of the Bryanston's Data Protection Policy.

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties of providing education and pastoral care and its contractual and statutory obligations as an employer, the School will process a wide range of Personal Data about our employees (including current, past and prospective employees) as part of its daily operations.

Some of this activity the School will need to carry out in order to fulfil its legal rights, duties or obligations – including those under the contract or terms of engagement with the employee and those imposed by employment, health and safety and taxation law.

Other uses of Personal Data will be made in accordance with Bryanston's lawful basis of processing namely "**legitimate interests**," or the legitimate interests of another, provided that these are not outweighed by the impact on individuals and provided it does not involve Special Category Personal Data or sensitive types of data.

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The School expects that the following uses may fall within that category of its (or its community's) "**legitimate interests**":

- for the purposes of employee selection (and to confirm the identity, qualifications and experience of prospective employees);
- for the purpose of producing an employment contract or terms of engagement and for paid employees running payroll, providing pension, life assurance and private health care (where applicable);
- for the purposes of identifying training and development needs and providing that training;
- for the purposes of organisational and management planning and forecasting, research and statistical analysis;
- to enable the relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
- to give and receive information and references about past, current and prospective employees, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past employees;
- to monitor (as appropriate) use of the School's IT and Communications Systems in accordance with the School's IT Policies;
- for security purposes, including CCTV in accordance with the school's Data Protection - CCTV Code of Practice; and
- where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the school.

In addition, the School may need to process **Special Category Personal Data** (concerning health, ethnicity, religion, biometrics or sexual life) in accordance with rights or duties imposed on it by law, including as regards safeguarding or from time to time by explicit consent where required. These reasons may include:

- to provide the employee with a safe working environment and to make reasonable accommodations for declared disabilities. Additionally, to take appropriate first aid action in the event of an emergency, incident or accident, including by disclosing to emergency services details of an individual's medical condition where it is in the individual's interests to do;
- To allow applicable employees to join the private health and life assurance schemes; or
- for legal and regulatory purposes (for example provision of diversity data) and to comply with its legal obligations and duties of care.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- interview notes, employment and other activity history, qualifications DBS check outcomes;
- vehicle details (about those who use our car parking facilities and site roads);
- voluntary supply of biometric information, which if supplied, will be collected and used by the School in accordance with the School's Biometrics Policy.
- bank details, national insurance and tax code other financial information, e.g. where residential accommodation is provided to the employee and their family;
- personal data relating to employee training records, past employer references, disciplinary and/or grievance records, attendance records, whistleblowing and safeguarding files;
- where appropriate, information about individuals' health, disability, dietary requirements and contact details for their next of kin;
- references given or received by the School about employees, and information provided by previous employers; and

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- images of employees (and occasionally other individuals) engaging in School activities, and images captured by the School's CCTV system (in accordance with the School's Data Protection – CCTV Code of Practice);

HOW THE SCHOOL COLLECTS DATA

Generally, the School receives Personal Data from the individual directly. This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However, in some cases personal data may be supplied by third parties (for example previous employers, GBG Group (in the context of DBS checks) and the Inland Revenue).

As a result of your employment the School also generates employee Personal Data in relation to appraisals, grievances and disciplinary and safeguarding incident investigations.

WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH

Occasionally, the School will need to share personal information relating to its employees with third parties, such as professional advisers (e.g. lawyers, insurers, PR advisers and accountants) or relevant government authorities (e.g. HMRC, the police or the local authority). Additionally, the School is subject to a regulatory inspection regime and therefore personal information may be viewed by inspectors (e.g. the Independent Schools Inspectorate, (specifically in relation to the School's Central Register) the Charity Commission or the Information Commissioner).

For the most part, Personal Data collected by the School will remain within the School and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records
- pastoral or safeguarding files
- all employee, resident and governor files
- employee biometric data (where supplied)

All employees are reminded that the school is under duties imposed by law and statutory guidance (including [Keeping Children Safe in Education](#)) to record or report incidents and concerns related to child safeguarding that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This may include file notes within the employee and safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please view the School's Safeguarding Policy.

Finally, in accordance with data Protection law, some of the School's processing activity is carried out on its behalf by third parties, such as IT HR administration and training, payroll systems, web developers or cloud storage providers. This is always subject to contractual assurances that Personal Data will be kept securely and only in accordance with the School's specific directions. Examples of a third party is, but not limited to, (and will change from time to time):

- Sd-worx (PHR and payroll solutions provider)
- Cylix (on-line training portal)
- CIPHR, (cloud-based HR resource management solution);

Full details of the School's third party processors can be made available upon request to the Data Protection Officer.

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HOW LONG WE KEEP PERSONAL DATA

The School will retain Personal Data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary staff and pupil personnel files is up to 7 years following departure from the school. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. Further details can be found within the Schools Records Management Policy.

If you wish to request that Personal Data you no longer believe to be relevant is considered for erasure, please contact the School's Data Protection Officer. However, please bear in mind that the School may have lawful and necessary reasons to hold on to some data.

YOUR RIGHTS

Employees 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 for the School to stop processing it, but subject to certain exemptions and limitations. Please refer to Bryanston Privacy Notice Overview for full details).

CONSENT

Where the School is relying on consent as a means to process Personal Data, the employee who gave the consent can withdraw it at any time. Please be aware however that the School may have another lawful reason to process the Personal Data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice or may otherwise exist under some form of contract or agreement with the individual.

The following processing activity is subject to employee consent:

- Biometric data for building access.

RIGHTS OF OTHERS

All employees are required to respect the Personal Data and privacy of others, and to comply with the School's:

- ICT Policies;
- Data Protection Policy;
- Data Protection – CCTV Code of Practice
- Subject Access Request Policy;
- Breach Notification Policy;
- Biometric Policy;

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CONTACT

The Data Protection Officer by post: Bryanston School, Blandford Dorset DT11 0PX, by email: dpo@bryanston.co.uk, by phone: + 44 (0)1258 452411.

MONITOR AND REVIEW

This Notice will be reviewed annually by the person responsible, namely the Data Protection Officer whose contact details are provided above.

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