SHERBORNE
SCHOOLS GROUP

Staff Privacy Notice

Approving body: Estates & Infrastructure Committee
Owner: Chief Operating Officer
Author: Operations Bursar (SG)

Executive Summary

This policy is intended to provide information about how the Sherborne Schools Group (the Group) will use (or process) personal data about its staff members; including employees, volunteers and governors. There is a separate Privacy Notice pertaining to other data subjects such as pupils and parents.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Employees, volunteers and governors are all encouraged to read this Privacy Notice and understand the Group's obligations to its entire community.

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Who we are

We are the Sherborne Schools Group, a company registered in England and Wales ('SSG' or 'the Group'). Our company registration number is 04002575, our charity registration number is 1081228 and our registered office is at Sherborne Boys School, Abbey Road, Sherborne, Dorset DT9 3LF. The Group includes Sherborne Boys, Sherborne Girls, Sherborne Prep, Hanford Prep, Sherborne International, and our trading subsidiaries.

In the course of your work undertaken for the Group, we will collect, use and hold ("process") personal data relating to you as a member of our staff or wider school team, regardless of your employment status. This makes the Group a controller of your personal information, and this Privacy Notice sets out how we will use that information and what your rights are.

Who this notice applies to

This notice applies to staff within the Group, including current, former and prospective:

- employees,
- self-employed contractors,

- visiting music teachers and other peripatetic workers,
- casual workers, temps, and volunteers who may be employed or engaged by the Group to work for it in any capacity,
- governors
- applicants for roles.

Please note that references to "employment", "staff" etc. in this Privacy Notice are not intended to imply or confer any employment rights on contractors, non-employed workers, or job applicants.

About this Notice

This Privacy Notice explains how the Group processes your personal data and your rights in relation to the personal data we hold about you.

This Privacy Notice applies in addition to the Group's other relevant terms and conditions and policies that may (depending on your role and status) apply to you, including:

- any contract between you and the Group, such as the terms and conditions of employment, the SSG Staff Code of Conduct and any applicable staff handbook;
- the Group's CCTV policy;
- the Group's policies relating to the retention of records;
- the Group's policies relating to disciplinary, safeguarding, pastoral, anti-bullying, or health and safety matters, including as to how concerns, low-level concerns or incidents are reported or recorded (both by and about staff);
- the SSG Data Protection Policy; and
- the Group's ICT policies, including those relating to acceptable use, e-safety/ online safety, social media, Wi-Fi and network security, remote working and use of personal devices.

If you wish to request a copy of any of the documents listed above, please contact the Policies, Inspection and Strategy Coordinator: policies@sherborneschoolsgirls.group.

Please note that any contract you may have with the Group will be relevant to how the Group processes your data, in accordance with any relevant rights or obligations under that contract. However, this Staff Privacy Notice is the primary document by which we notify you about the processing of your personal data by the Group.

This Staff Privacy Notice also applies alongside any other information the Group may provide about particular uses of personal data, for example when collecting data via an online or paper form.

How we collect your information

Before you are employed or engaged by the Group, we may collect your personal data in a number of ways, for example:

- from the information you provide to us before making a job application
- when you submit a formal application to work for us, and provide your personal data in application forms and covering letters, or when you complete a self-declaration, etc.
- when you attend an interview
- from third parties, for example the Disclosure and Barring Service ("DBS") and referees (including your previous or current employers or school), or from third party websites (as part of online suitability checks for shortlisted candidates) or (if you are a contractor or a

substitute) your own employer or agent, in order to verify details about you and/or your application to work for us.

During the course of your employment or engagement with us, we will collect data from or about you, including:

- when you provide or update your contact details
- when you or another member of staff completes paperwork regarding your performance appraisals
- in the course of fulfilling your employment (or equivalent) duties more generally, including by filling reports, note taking, or sending emails on Group systems
- in various other ways as you interact with us during your time as a member of staff, and afterwards, where relevant, for the various purposes set out below.

The types of information we collect

We may collect the following types of personal data about you (and your family members and 'next of kin', where relevant):

Contact and communications information

Including:

- your contact details (including email address/es, telephone numbers and postal address/es)
- contact details (through various means, as above) for your family members and '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
- records of communications and interactions we have had with you.

Biographical, educational and social information

Including:

- your name, title, gender, nationality and date of birth
- your marital status and details of any dependents you may have
- your image and likeness, including as captured in photographs taken for work purposes
- details of your education and references from your institutions of study
- lifestyle information and social circumstances
- your interests and extra-curricular activities
- information in the public domain, including information you may have posted to social media, where relevant to your role (e.g. as part of pre-employment screening).

Financial information

Including:

- your bank account number(s), name(s) and sort code(s) (used for paying your salary or invoices and processing other payments)
- your tax status (including residence status)
- Gift Aid declaration information, where relevant (for example, where we help you to administer donations to charity from your pre-taxed earnings)
- information related to pensions, national insurance, or employee benefit schemes.

Work related information

Including:

- details of your work history and references from your previous employer(s)
- records of your work at the Group (including your start date, working hours, training records and performance / appraisal records, and information about your use of our IT systems)
- your personal data captured in the work product(s), notes and correspondence you create while employed by or otherwise engaged to work for the Group
- if applicable, recordings of your lessons and other meetings with staff and pupils, and of your participation in Group events
- details of your professional activities and interests
- your involvement with and membership of sector bodies and professional associations;
- information about your employment and professional life after leaving the Group, where relevant (for example, where you have asked us to keep in touch with you)
- details of your right to enter, live and work in the UK, including your nationality and other immigration status information (i.e. about your entitlement to work in the UK), including copies of passport information (if applicable)
- details of any disciplinary matters or grievances which you raise or which relate to you
- any other information relevant to your employment or other engagement to work for the Group.

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 revealing your racial or ethnic origin
- trade union membership, where applicable
- 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)
- information concerning your sexual life or orientation (for example, in the course of investigating complaints made by you or others, for example concerning discrimination)
- information about certain criminal convictions (for example, where this is necessary for due diligence purposes, whether by self-declaration or otherwise, or for compliance with our legal and regulatory obligations).

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 Group.

The bases for processing your personal data, how that data is used and whom it is shared with

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 at your request prior to entering into a contract, such as a contract of employment or other engagement with us. In this respect, depending on your role and status, we are likely to use your personal data for the following purposes:

- 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 and obtaining any required self-declarations
- once you are employed or engaged by us in any capacity, for the performance of the contract of employment (or other agreement) between you and us
- 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
- monitoring your use of our ICT systems to ensure compliance with our policies (including the policies relating to the acceptable use of ICT)
- to assess and make decisions about your fitness to work, training and development requirements
- to promote the Group to prospective parents and others, including by publishing the work product(s) you create while employed by or otherwise engaged to work for the Group
- 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
- for any other reason or purpose set out in your employment or other contract with us.

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 Group in a professional, sustainable manner, in accordance with all relevant ethical, educational, charitable, legal and regulatory duties and requirements (whether or not connected directly to data protection law). In this respect, depending on your role and status, we are likely to use your personal data for the following:

- to provide you with information about us and what it is like to work for us (where you have asked for this, most obviously before you have made a formal application to work for us)
- for security purposes, including by operating security cameras in various locations on the Group's premises
- to enable relevant authorities to monitor the Group's performance and to intervene or assist with incidents as appropriate
- to provide education services to pupils, including where such services are provided remotely (either temporarily or permanently)
- to safeguard staff and pupils' health and welfare and provide appropriate pastoral care;
- to carry out or cooperate with any Group 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
- to make travel arrangements on your behalf, where required
- to contact you or your family members and 'next of kin' for business continuity purposes, to confirm your absence from work, etc.

- to publish your image and likeness in connection with your employment or engagement with us
- to monitor (as appropriate) use of the Group's IT and communications systems in accordance with the Group's policies relating to the acceptable use of IT and government guidance such as KCSIE.

Legal Obligations

We also process your personal data for our compliance with our legal obligations, notably those in connection with employment, charity / company law, tax law and accounting, and child welfare. In this respect, depending on your role and status, we are likely to use your personal data for the following:

- child welfare (including following the requirements and recommendations of KCSIE), social protection, diversity, equality, and gender pay gap monitoring, employment, immigration / visa sponsorship compliance 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
- 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.

Special categories of data

Depending on your role and status, 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 (treated for these purposes as special category data) for the reasons and purposes set out below.

In particular, we process the following types of special category personal data for the following reasons:

- 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
- recording your racial or ethnic origin and sexual orientation in order to monitor our compliance with equal opportunities legislation
- recording your trade union membership, in connection with your rights as an employee, agent or contractor and our obligations as an employer or engager of your services;
- to investigate complaints made by you or others, for example concerning discrimination, bullying or harassment, or as part of a complaint made against the Group
- data about any criminal convictions or offences committed by you, for example when conducting criminal background checks with the DBS, or via a self-declaration, or where a matter of public record (online or by any media), or where it is necessary to record or report an allegation (including to police or other authorities, with or without reference to you).

We will process special categories of personal data for lawful reasons only, including because:

- you have given us your explicit consent to do so, but only in circumstances where seeking consent is appropriate
- it is necessary to protect your or another person's vital interests, for example, where you have a life-threatening accident or illness in the workplace and we have to process your personal data in order to ensure you receive appropriate medical attention

- it is necessary for the purposes of carrying out legal obligations and exercising legal rights (both yours and ours) in connection with your employment or engagement by us
- it is necessary in connection with some function in the substantial public interest, including:
    - the safeguarding of children or vulnerable people; or
    - to prevent or detect unlawful acts; or
    - as part of a function designed to protect the public, pupils or parents from seriously improper conduct, malpractice, incompetence or unfitness in a role, or failures in services by the Group (or to establish the truth of any such allegations); or
    - or to cooperate with a relevant authority, professional or regulatory body (such as the ISI, DfE, LADO or TRA) in such matters*
- to comply with public health requirements (e.g. in respect of Covid-19 or in similar circumstances); or
- it is necessary for the establishment, exercise or defence of legal claims, such as where any person has brought a claim or serious complaint against us or you.

Low-level concerns about adults

We will process personal data about you, whether or not it constitutes special category data, in accordance with our policies on recording and sharing low-level concerns about adults (further detail is available in the SSG Safeguarding and Child Protection Policy and relevant Low Level Concerns policies). This will be processed for the same safeguarding and/or employment law reasons as set out above.

Such records are subject to the rules on retention set out in the Group's Data Retention Guidelines, and you have the same rights in respect of that information as any other personal data that we hold on you. However, any requests to access, erase or amend personal data we hold in accordance with this policy may be subject to necessary exemptions, for example if we consider that compliance with the request might unreasonably impact the privacy rights of others or give rise to a risk of harm to children.

As a general rule, records of low-level concerns will be kept for up to seven years following the termination of your employment, but may need to be retained longer. Low-level concerns will not be included in references unless they relate to issues which would normally be included in references, for example, misconduct or poor performance. A low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference.

Sharing your information with others

For the purposes referred to in this Privacy Notice and relying on the grounds for processing as set out above, we may share your personal data with certain third parties. We may disclose limited personal data (including in limited cases special category or criminal data) to a variety of recipients including:

- other employees, agents and contractors (e.g. third parties processing data on our behalf as part of administering payroll services, the provision of benefits including pensions, IT etc. – although this is not sharing your data in a legal sense, as these are considered data processors on our behalf)
- DBS and other government authorities (e.g. HMRC, DfE, CAFCASS, Police, Home Office, a relevant public health / NHS body and / or local authority) and/or appropriate

regulatory bodies e.g. the Teaching Regulation Agency, the Independent Schools Inspectorate, the Charity Commission etc.
- other schools in the Group
- third party background check agencies
- external auditors or inspectors
- our advisers where it is necessary for us to obtain their advice or assistance, including insurers, lawyers, accountants, or other external consultants
- when the Group is legally required to do so (by a court order, government body, law enforcement agency or other authority of competent jurisdiction), for example HM Revenue and Customs or police.

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. References given or received in confidence may not be accessible under your UK GDPR rights.

How long your information is kept

Personal data relating to unsuccessful job applicants is deleted within 12 months of the end of the application process, except where we have notified you we intend to keep it for longer (and you have not objected).

Subject to any other notices that we may provide to you, we may retain your personal data for a period of seven years after your contract has expired or been terminated. However, some information may be retained for longer than this, for example incident reports and safeguarding files, in accordance with specific legal requirements. Please see our policies relating to the retention of records.

Your rights

You have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you
- to require us to correct the personal data we hold about you if it is incorrect
- to require us (in certain circumstances) to erase your personal data
- to request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal)
- to 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 personal data to another data controller
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. The Group will endeavour to respond to any such requests as soon as is reasonably practicable and in any event within statutory time-limits (which is generally one month, but fulfilling more complex or multiple requests, e.g. those involving third party information, may take longer).

You can find out more about your rights under applicable data protection legislation from the Information Commissioner's Office (ICO) website available at www.ico.org.uk.

This notice

The Group 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.

Queries and complaints

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 Data Protection Lead via: dataprotection@sherborneschools.group.

If you believe that the Group has not complied with this Privacy Notice or acted otherwise than in accordance with data protection law, you should email the Data Protection Lead with details of your complaint. The Group will acknowledge your complaint within 30 days of receipt and will investigate and inform you of the outcome of your complaint without undue delay (keeping you informed of progress as necessary).

If you are not satisfied with the outcome of your complaint, or if you feel the Group has not handled it appropriately, you have the right to complain to the Information Commissioner's Office (ICO): https://ico.org.uk/make-a-complaint/data-protection-complaints/

Appendix 1: Summary of Changes in Issue 1.3

- Author changed to Operations Bursar.
- Data retention guidelines referenced in section on Low-level concerns about adults.