
PRIVACY NOTICE FOR STAFF

The Corporation of Oundle School includes both Oundle School, a boarding and day School for pupils aged 11 – 18 and Laxton Junior School (LJS), a day School for pupils aged 4 - 11. This policy applies equally to both Schools and any reference to 'the School' relates to both Oundle and LJS.

This is a non-contractual policy and it may be amended by the School from time to time as appropriate, for example in order to incorporate changes in law or in line with best practice. It is the responsibility of the Human Resources department to ensure this policy is regularly reviewed by the Leadership Team and that key changes are highlighted and communicated to the consultative committees across the School.

Introduction

This statement is to help Staff (including Volunteers and Staff working on behalf of the School) understand how and why we collect personal data about you. It also explains the decisions that you can make about your own information. If you have any questions about this notice, please contact the HR Department. The School collects and processes personal data relating to its employees in order to manage the employment relationship. The School is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What is personal data?

Personal data is information that identifies you as an individual. This includes contact details, next of kin and financial information. We may also hold information such as your religion or ethnic group. CCTV, photos and video recordings of you are also considered as personal data and handled appropriately.

How and why does the School collect personal data?

The School collects and processes a range of information about you. This includes:

- Personal Information, such as name, address and contact details, national insurance number etc.
- Information relating to your contract, such as salary, benefits, hours worked
- Statistics such as absence, gender, age
- Records of our communications with you on topics such as flexible working, maternity, grievances

Please see [Appendix A](#) for a detailed list of the information collected by the School.

The School collects this information in a variety of ways. For example, data is collected through application forms, CVs or resumes; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment (such as nomination forms for life assurance); from correspondence with you; or through interviews, meetings or other assessments.

The School also collects personal data about you from third parties, such as references supplied by former employers and information from criminal records checks permitted by law.

Data is stored in a range of different places, including in your personnel file, in the School's HR management systems and in other IT systems (including the School's email system).

How and why does the School collect personal data?

The School uses your personal data to administer its obligations under your employment contract and to comply with legislation where required. This includes:

- Employment life cycle process e.g. recruitment, promotion,
- Employment records e.g. pay, pensions, statistics
- Communication with you e.g. appraisal, absence

Please see [Appendix B](#) for a full list of the information held.

Why does the School need to process your personal data?

In order to carry out its normal duties to staff, the School needs to process a wide range of personal data about individuals as part of its daily operation.

The School is permitted to process your personal data in this way, in compliance with data protection legislation, by relying on one or more of the following lawful grounds:

The processing is necessary:

- to meet the terms of your employment contract;
- to ensure compliance with legal and/or regulatory obligations;
- for the purposes of the Schools legitimate interests; or
- to protect you and your vital interests

Some categories of personal data require your specific consent – for example, in relation to occupational health and obtaining medical records in the context of your employment. If the School wishes to process this data, your specific consent will be requested.

Please see [Appendix C](#) for a full list of the reasons as to why the School can use your personal data in this way

Sharing of your personal data with third parties

Your personal data will be shared internally, including with members of the HR and recruitment team (including payroll), your line manager, managers in the department, area or Houses in which you work and IT staff, if access to your personal data is necessary for performance of their roles. Medical and pastoral, or safeguarding files have strict rules of access.

The School shares some of your personal data with third parties in order to obtain pre-employment references from other employers and obtain necessary criminal records checks from the Disclosure and Barring Service.

The School also shares some of your personal data with third parties that process data on its behalf, in connection with payroll, the provision of benefits and the provision of occupational health services.

As required, the School will also share your personal data with professional advisers (e.g. lawyers, insurers, accountants); government authorities (e.g. the Department for Education, police, local authority) and appropriate regulatory bodies (e.g. the Teaching Regulation Agency, formerly the NCTL, the Independent Schools Inspectorate, the Charity Commission, the Boarding Schools Association). The School will also share your personal data with the relevant statutory authorities in relation to any alleged safeguarding concerns.

The School will not transfer your data to countries outside the European Economic Area.

We use third party “cloud computing” services to store some information. This data is still protected and we have data processing contracts in place with the organisations that run these services. Where the School engages third parties to process or store personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

What do we do with your personal information?

The Bursar is responsible for managing how we look after personal data at the School, and deciding on how it is shared. In compliance with the legislation regarding your personal data we need to keep it safe, up to date, only use it for the purpose we collected it for, retain it for only the length of time needed for us to process it and most importantly treat the information we have collected fairly.

The School takes the security of your data seriously. There are 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 its employees in the performance of their duties. Paper records are retained within locked cabinets in secure buildings either on School premises or stored by a third party document storage company, prior to being securely destroyed. Electronic data is stored only on the School’s internal servers (including email) and access to personnel records stored electronically is restricted only to those requiring access as part of their duties.

We only retain your information for as long as we need to. The retention period depends on the type of information. Typically, the legal recommendation for how long to keep Staff 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. In exceptional circumstances we may keep your information for a longer time than usual or share it more widely than we would normally.

What decisions can you make about your information?

Individuals 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 removed, amended or for the School to stop processing it, subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation should put their request in writing to the Bursar.

The School will endeavour to respond to any written requests as soon as is reasonably practicable and within one month in the case of requests for access. The School is better able to respond quickly to smaller, targeted requests for information.

If you have a concern about the way the School is collecting or using your personal data, we ask that you raise the concern with us (via bursar@oundleschool.org.uk) in the first instance. Alternatively you can contact the Information Commissioner's office at <https://ico.org.uk/concerns>

What if you do not provide your personal data?

You have some obligations under your employment contract to provide the School with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide the School with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable the School to enter a contract of employment with you. If you do not provide such information, this will hinder the School's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

Automated decision-making

Some of the School's employment decisions are based solely on automated decision-making.

- Financial Information – entitlement to School benefits, including pension enrolment and life assurance cover, are automatically applied after a specified length of service.
- Absence Records – entitlement to School sick pay is automatically applied after a specified length of service.

Previously reviewed	May 2018 by LW
Reviewer	AN
Post of Reviewer	Director of HR
Review Date	March 2021
Reviewed by OS	n/a
Reviewed by LJS	n/a
Signed off by both Schools	n/a
Next Review (max. 3 years)	March 2023 or in the event of change

Appendix A

- Your name, address and contact details, including email address and telephone number, date of birth and gender;
- The terms and conditions of your employment;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the School;
- Information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- Details of your bank account and national insurance number;
- Information about your marital status, next of kin, dependants and emergency contacts;
- Information about your nationality and entitlement to work in the UK;
- Information about your criminal record;
- Details of your schedule (days of work and working hours) and attendance at work;
- Details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave;
- Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- Assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence;
- Information about medical or health conditions, including whether or not you have a disability for which the School needs to make reasonable adjustments; and
- Details of trade union membership.

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Appendix B

- Run recruitment and promotion processes;
- Maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- Operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- Operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- Operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- Obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- Operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the School complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- Ensure effective general HR and business administration;
- Provide references on request for current or former employees;
- Respond to and defend against legal claims; and
- Maintain and promote equality in the workplace.

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Appendix C

To meet the terms of your employment contract

The School needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract. For example, it needs to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer pension and insurance entitlements.

To ensure compliance with legal and regulatory obligations

In some cases, the School needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled. For all roles within the School, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role for which they are employed.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities and for health and safety purposes).

For the purposes of the School's legitimate interests

In other cases, the School has a legitimate interest in processing personal data before, during and after the end of the employment relationship. These legitimate interests are:

- To allow the School to maintain accurate recruitment records;
- To allow the School to maintain accurate employee records and contact details;
- For emergency contact purposes;
- To maintain a record of employee's contractual and statutory rights;
- To ensure that employees receive statutory and contractual entitlements;
- To maintain a record of the operation of absence procedures;
- To maintain a record of the operation of performance management systems and performance improvement processes;
- To record the delivery and results of statutory training, relevant to the role
- To maintain a record of the management, operation and efficacy of training procedures;
- To record and maintain performance standards;
- To maintain a record of the operation of disciplinary procedures and their outcome;
- For defence against potential legal claims.

Where the School relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees and has concluded that they are not.

For the purposes of protecting your vital interests

In such situations as a medical emergency, where the priority will be to get you the most appropriate help.

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