

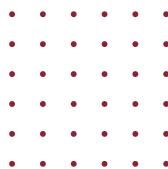


**Strathearn School**

# PRIVACY NOTICE FOR TEACHING STAFF

**Version History: Approved by Board of Governors**

DATE	AMENDMENT



# CONTENTS



## SUBJECT

## PAGE NUMBER

INTRODUCTION	3
FURTHER INFORMATION & GUIDANCE	3 & 4
HOW DO WE COLLECT & HOLD PERSONAL INFORMATION?	4
WHAT PERSONAL INFORMATION DO WE COLLECT, STORE & USE ABOUT TEACHING STAFF?	4
WHY DO WE COLLECT, STORE AND USE THIS INFORMATION?	4 & 5
WHEN DO WE NEED YOUR CONSENT?	5
HOW LONG DO WE STORE PERSONAL INFORMATION FOR?	5 & 6
HOW DO WE STORE PERSONAL INFORMATION?	6
WHO DO WE SHARE PERSONAL INFORMATION WITH?	6
WHY DO WE USE PERSONAL INFORMATION?	6
DO WE TRANSFER PERSONAL INFORMATION OUTSIDE OF THE EEA?	6
WHAT ARE MY DUTIES UNDER THE GENERAL DATA PROTECTION REGULATION?	7
WHAT ARE MY RIGHTS UNDER THE GENERAL DATA PROTECTION REGULATION?	7



## INTRODUCTION

Strathearn School is committed to protecting your personal information, being transparent about the information we collect about you, and ensuring that you are aware of your legal rights in relation to privacy. The purpose of this Privacy Notice is to give you a clear explanation about how we use the personal information that we collect from you and how you can control the information we use.

The General Data Protection Regulation entered into force on 25 May 2018 and under the provisions of the Regulations, Strathearn School is required to notify you of the information that we hold about all our teaching staff. As a result, we are responsible for deciding how we hold and use the personal information that we collect.

We collect and use personal information about teaching staff for a variety of lawful purposes and this Privacy Notice sets out how we collect and use such information before, during and after your working relationship with the school. The Privacy Notice applies to prospective, current and former members of the teaching staff.

Personal information means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more traits specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Personal information is information that identifies you and relates to you.

Most of the personal information that you provide to us is information that you are obliged legally to provide or information that is necessary to enable us to fulfil our contractual responsibilities to you, but some personal information is provided on a voluntary basis. When collecting information from you, we will inform you whether you are required to provide certain personal information to us or if you have a choice in this. Where you have a choice and we are seeking to collect information on a voluntary basis, we will obtain your express consent to such information collection.

This Privacy Notice does not form part of any contract or any other contract to provide services between you and the school, and it may be updated or amended by the school at any time. In such circumstances, the school will inform you and provide you with an updated copy of the notice as soon as reasonably practicable.

It is important that you read and retain this notice, together with any other privacy notices that we may issue on specific occasions when we are collecting or processing personal information about you. This will not only help to ensure that you are aware of how and why we are using personal information, but it will also ensure that you are aware of your rights under the General Data Protection Regulation.

## FURTHER INFORMATION & GUIDANCE

If you have any questions about this Privacy Notice or about how the school controls and processes personal information, please contact the Principal who will deal with your query in the first instance. The Principal can be contacted by post, telephone or email at the address set out below.

**The Principal**  
**Strathearn School**  
**188 Belmont Road**  
**Belfast**  
**BT4 2AU**

**Email: [nconnery620@c2ken.net](mailto:nconnery620@c2ken.net)**  
**Tel: 02890 471595**

Strathearn School is required by law to have a Data Protection Officer and our Data Protection Officer is the Education Authority. The EA is responsible for monitoring and overseeing our data protection systems and procedures and for ensuring that they satisfy the standards and requirements of the General Data Protection Regulation.

In addition, please note that you have the right to make a complaint at any time to the Information Commissioner, the supervisory authority for data protection matters with the United Kingdom. The Information Commissioner can be contacted by post, telephone or email at the local address set out on the following page.

**The Information Commissioner's Office**  
**Third Floor**  
**14 Cromac Place**  
**Belfast**  
**BT7 2JB**

**Email: [ni@ico.org.uk](mailto:ni@ico.org.uk)**  
**Tel: 028 9027 8757**

## HOW DO WE COLLECT & HOLD PERSONAL INFORMATION

We mainly collect personal information about teaching staff over the course of the time that you are working with us, and if you fail to provide certain information when requested, then we may not be able to comply with our legal obligations (for example, in relation to health and safety).

We also collect personal information about teaching staff as part of the application and recruitment process, either directly from applicants themselves or indirectly from employment agencies, referees, former employers, or background check providers.

We keep personal information electronically on our information management systems and networks or manually on paper in indexed filing systems.

## WHAT PERSONAL INFORMATION DO WE COLLECT, STORE & USE ABOUT TEACHING STAFF?

We collect, store and use the following categories of personal information about our teaching staff:

- Personal information, such as name, age, date of birth, photographs, and teacher number;
- Contact information such as address, emergency contact information and telephone number;
- Qualification information such as exam results, degree classes and professional memberships;
- Recruitment information such as copies of references, curriculum vitae and Access NI disclosure;
- Financial information such as bank account details, national insurance number and tax status;
- Contractual information such as start dates, working hours, annual leave and pay information;
- Absence information such as sickness certificates, number of absences and absence reasons;
- Performance information such as performance review and staff development materials;
- Disciplinary and grievance information such as investigation reports and disciplinary sanctions;
- Information technology usage information such as resource usage and websites accessed;
- Biometric information such as fingerprint scans and closed circuit television footage captured within the school; and
- Special category information such as ethnicity, religious beliefs, language, country of birth, and nationality, as well as information about trade union membership, health needs and allergies.

## WHY DO WE COLLECT, STORE AND USE THIS INFORMATION?

We only make use of personal information when permitted by law. Most commonly, we use personal information relating to teaching staff to comply with our legal obligations and where it is needed for us to discharge our legal duties and responsibilities as an employer.

Some examples of the circumstances in which we use personal information, including special category information, are set out below:

- To comply with all applicable employment laws, regulations and guidelines;
- To develop, document and administer effective contracts of employment for staff;
- To recruit and appoint staff and comply with fair employment monitoring requirements;
- To check staff are appropriately qualified and legally entitled to work for the school;
- To process salary payments and make appropriate deductions for tax and national insurance;
- To enrol staff in pension schemes and comply with pension scheme rules and obligations;
- To carry out performance reviews, identify training needs and manage overall performance;
- To help inform decisions about compensation, salary reviews, promotions, and job evaluation;

- To manage attendance at work, assess fitness to work and identify reasonable adjustments;
- To ensure staff safety, security and well being and to provide appropriate pastoral support;
- To gather evidence and carry out effective grievance or disciplinary investigations;
- To comply with health and safety responsibilities and data sharing legal obligations;
- To deal with legal actions and disputes involving staff, including accidents in the workplace;
- To maintain network and information security and prevent unauthorised access to systems;
- To ensure compliance with policies on the use of information and communication technology;
- To maintain proper records and accounts and to administer the school effectively; and
- To review and assess the quality of service delivery and implement improvement strategies.

Some of the circumstances in which we use the personal information set out above will often overlap and in practice there may be several grounds which justify our use of your personal information.

In addition, we may also be permitted to collect and use your personal information in order to comply with specific requirements set out in legislation, including:

- The Education and Libraries (N) Order 1986;
- The Education Reform (NI) Order 1989;
- The Education and Libraries (NI) Order 1993;
- The Education (NI) Order 1996;
- The Education (NI) Order 1997;
- The Education (NI) Order 1998;
- The Education and Libraries (NI) Order 2003;
- The Special Educational Needs and Disability (NI) Order 2003;
- The Education (NI) Order 2006;
- The Education Act (NI) 2014;
- The General Data Protection Regulation 2016; and
- The Data Protection Act 2018

## WHEN DO WE NEED YOUR CONSENT?

Whilst most of the personal information provided to the school is required for us to comply with our legal obligations, some of that information can only be provided to us on a voluntary basis through the exercise of individual consent. When collecting personal information, we will inform you whether you are required to supply such information under an existing legal obligation or whether your express individual consent is needed. When we need express consent (for example, in relation to the use of biometric information to access buildings and catering services), we will provide you with a specific and clear notice that explains why such information is being collected and how such information data will be used.

If we ask for your consent to use personal information for a specific purpose and you provide us with your consent freely and unambiguously, you can then withdraw your consent at any time. Please note that any request to withdraw consent must be submitted in writing to the Principal at the address set out above. Once we have received notification that you wish to withdraw your consent, we will no longer process your personal information for the purpose or purposes for which you originally gave your consent, unless we have another legitimate basis for doing so in law.

## HOW LONG DO WE STORE PERSONAL INFORMATION FOR?

The school only keeps personal information for as long as necessary to fulfil the purposes for which it was collected to comply with all relevant legal, accounting and reporting requirements. We do not store personal information forever and we only hold personal information about teaching staff for as long as we are legally able to do so. Where we do keep personal information for longer periods for historical reasons (for example, year group or sports team photographs) you will always have a right to ask for such information to be destroyed.

In determining the appropriate retention period for personal information, the school will consider a range of factors including: the amount, nature and sensitivity of the personal information concerned; the potential risk of harm from the unauthorised use or disclosure of the information; the purpose for which the personal information was processed; the availability of other means to achieve this purpose; and the applicable legal requirements.

In order to ensure compliance with legal requirements and consistency with other schools, Strathearn School has adopted the model Disposal of Records Schedule developed by the Department of Education. This schedule provides greater detail on how long we keep personal information and can be found at [www.education-ni.gov.uk/publications/disposal-records-schedule](http://www.education-ni.gov.uk/publications/disposal-records-schedule).

It is important to note that in some circumstances we may anonymise your personal information so that it can no longer be associated with you. In such circumstances the school may continue to use such personal information without further notice to you. Once you are no longer an employee of the school, we will retain and securely destroy your personal information in accordance with the model Disposal of Records Schedule.

## HOW DO WE STORE PERSONAL INFORMATION?

The school has put in place appropriate security measures to stop personal information from being accidentally lost, used or accessed in an authorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors, and other third parties who have a need to know. They will only process personal information on our instructions and they are subject to a duty of confidentiality.

In addition, we have put in place procedures to deal with any suspected data security breach and we will notify you and the applicable regulator (currently the Information Commissioner's Office) of any suspected breach where we are legally required to do so.

## WHO DO WE SHARE PERSONAL INFORMATION WITH?

From time to time, the school may have to share personal information about teaching staff with third parties, including service providers and other bodies such as:

- The Department of Education;
- The Education Authority for NI;
- The Northern Ireland Curriculum, Examinations and Assessment;
- The General Teaching Council for NI;
- The Northern Ireland Teachers' Pension Scheme;
- The Education and Training Inspectorate;
- The C2k Service provider;
- The Cashless Catering Service provider;
- The Biometric Access Control Service provider;
- The Strathearn Old Girls' Association;
- The Department of Health;
- The Police Service of Northern Ireland;
- The Equality Commission for Northern Ireland; and
- HM Revenue and Customs

## WHY DO WE USE PERSONAL INFORMATION?

Strathearn School does not share information about our teaching staff with anyone without consent unless it is required by law, it is necessary to administer the working relationship with you, or it is permitted by a legitimate interest.

In order to be granted access to such personal information, a third party must comply with strict terms and conditions covering inter alia the confidential handling of data, security arrangements and the use of data.

## DO WE TRANSFER PERSONAL INFORMATION OUTSIDE OF THE EEA?

Strathearn School will not transfer the personal information we collect about you to any country outside of the European Economic Area without telling you in advance that we intend to do so and outlining the steps that we have taken to ensure that your personal information remains adequately protected in such circumstances.

## WHAT ARE MY DUTIES UNDER THE GENERAL DATA PROTECTION REGULATION?

It is important that the personal information held by the school is accurate complete and up to date. As a result, you are required to keep us informed of any changes in your personal information during the course of your working relationship with Strathearn School.


## WHAT ARE MY RIGHTS UNDER THE GENERAL DATA PROTECTION REGULATION?

Under the General Data Protection Regulation, all teaching staff have the right to request access to personal information about them that we hold. To make a request for your personal information, or to be granted access to such information, please contact the Principal at the address set out above.

In order to help us confirm your identity and ensure your right to access the information requested (or to exercise any of your other rights to correction, erasure or restriction), we may need to ask for further specific information from you. In this way, we will seek to ensure that personal information is not disclosed to any person who has no right to receive it.

Under certain circumstances, a member of teaching staff has the right by law to:

- **Request access to personal information** - this enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. You will not have to pay a fee to access your personal information or to exercise any of your other rights. However, the school may charge a reasonable fee if your request for access is deemed to be unfounded or excessive. Alternatively, we may refuse to comply with your request in such circumstances;
- **Request correction of personal information** - this enables you to have the school correct any incomplete or inaccurate information that we hold about you;
- **Request erasure of personal information** - this enables you to require the school to delete or remove any personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing; and
- **Object to processing of personal information** - this enables you to object to the processing of personal information by the school on particular grounds, even if we are relying on a legitimate interest (or that of a third party). You also have the right to object where we are processing personal information relating to you for direct marketing purposes;
- **Request restriction of processing of personal information** - this enables you to prevent the processing of personal information by the school, but for the information to continue to be held by the school in certain circumstances (for example, if the accuracy of the information is contested and the school is verifying the information); and
- **Request transfer of personal information** - this enables you to request the transfer of your personal information from the school to another party (for example, a new employer).



Privacy