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**Campion School**

**Privacy Notice for Staff – 2023-24**

**How we use your information**

**Who are we?**

Campion School is the ‘data controller’, which means it is responsible for how your personal information is processed and for what purposes.

Campion School is registered as the Data Controller with the Information Commissioner’s Office (ICO); Registration Number: Z60340

You can contact the school as the Data Controller, in writing, at: Campion School,

Sydenham Drive, Leamington Spa CV31 1QH or email head@campion.warwickshire.sch.uk

**What is a Privacy Notice?**

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how the school processes (collects, stores, uses and shares) personal information about its staff.

**What is Personal Information?**

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller’s possession or likely to come into such possession.

‘Special category’ personal information reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

**What personal information do we process about staff?**

The categories of staff information that we collect, hold and share include:

* Personal information (such as name, contact details, national insurance number, emergency contact details, bank details, tax status)
* Recruitment information (including copies of right to Work in the UK documentation, referenced and other information contained in an application form, CV and/or covering letter or as part of the recruitment process)
* Contract information (such as start dates, hours work, post, roles and salary, benefits and pension information)
* Driving licence and vehicle insurance information
* Work absence information such as number of absences and reasons
* Qualifications and employment records including work history, training records and professional memberships
* Performance-related information
* Notes and outcomes of any disciplinary and/or grievance investigations and meetings
* CCTV footage and photographs
* Data about your use of the school’s information and communication systems

We may also collect, store and process ‘special categories’ of data including characteristics information, such as:

* Age/date of birth, gender, disability, ethnicity, religious beliefs, sexual orientation
* Trade Union Membership
* Health, including some medical conditions or disabilities, sickness records, medical reports

**For what purposes do we use personal information?**

The purpose of processing this data is to help us run the school, including to:

* Facilitate safe recruitment, as part of our safeguarding obligations towards students
* Enable you to be paid and make appropriate contributions to National Insurance, Pension Schemes etc
* Ensure we can fulfil our duty of care to you and act in an emergency, or make reasonable adjustments in the workplace for you
* Support effective performance management
* Inform our recruitment and retention decisions and policies
* Allow better financial modelling and planning
* Enable monitoring of protected characteristics such as ethnicity and disability
* Improve the management of workforce data across the sector
* Support the work of the School Teachers’ Review Body.

**Collecting staff information**

Whilst the majority of staff information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain staff information to us or if you have a choice in this.

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 can request to withdraw consent if you wish to do so.

**What are the legal reasons for us to process your personal information?**

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. Data Protection law sets out the lawful reasons we have to process your personal information and these are as follows:

**1) To comply with the law**

We collect and use general purpose staff information in order to meet certain legal requirements and legal obligations placed upon the school by UK law. We therefore have the right to process your personal information for such purposes without the need to obtain your consent. If you would like a copy of, or further information regarding the statutory authorities that underpin our legal obligations, you should contact the school in writing.

**2) To protect someone’s vital interests**

We are able to process personal information when there is an emergency and/or where a person’s life is in danger.

**3) With the consent of the individual to whom that information ‘belongs’**

Whilst much of the personal information is processed in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

**4) To perform a public task**

It is a day-to-day function of the school to ensure that staff members receive the training and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that staff are properly supported and able to do their job.

**5) To comply with a contract we have with you or because you have asked us to take specific steps before entering into a contract**

We are able to process personal information in order to comply with the contract that we have with you.

**6) Where we have legitimate interests in processing the data** for example, defence of potential legal claims, or maintaining standards of performance and discipline, where the legitimate interest is not outweighed by the rights of the person.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be seral grounds that justify the school’s use of your data.

Special category personal information

In order to process ‘special category’ data, we must be able to demonstrate how the law allows us to do so. In additional to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

1. Explicit consent of the data subject
2. Necessary for carrying out obligations and exercising specific rights in relation to employment and social security and social protection law
3. Processing relates to personal data which is manifestly made public by the data subject
4. Necessary for establishing, exercising or defending legal claims
5. Necessary for reasons of substantial public interest
6. Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
7. Necessary for archiving, historical research or statistical purposes in the public interest.

**Who might we share your information with?**

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

* The Local Authority – to meet our legal obligations to share certain information with it
* The Department for Education or other central government organisation
* Your nominated representatives
* Our regulator, Ofsted
* Suppliers and services provides – to enable them to provide the service we have contracted them for, such as pension providers
* Financial organisations
* Our Auditors
* Survey and research organisations
* Trade unions and associations
* Health authorities
* Security organisations
* Health and social welfare organisations
* Professional advisers and consultants
* Police forces, courts, tribunals
* Professional bodies.

**Data collection requirements:**

To find out mre about the data collection requirements placed on us by the Department for Education (for example; via the School Workforce Census) go to

https://www.gov.uk/education/data-collection-and-censuses-for-schools

**What do we do with your information/how is it stored?**

All personal information is held in a manner which is compliant with Data Protection legislation. Personal information is only processed for the purpose it was collected.

We create and maintain an employment/personal file for each staff member. The information in this file is kept secure and is only used for purposes directly relevant to your employment.

Information is also held on the SIMS Personnel database, Your HR, CPD Genie and BPS Databases. Access to information on these databases is restricted.

Once your employment with us has ended, we retain the personal file, and then delete the information in it, in accordance with our Retention of Records Policy, which is available on request.

The school monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

**How long do we keep your information for?**

In retaining personal information, the school complies with the Retention Schedules provided by the Information Record Management Society (as party of our Records Management Policy). The schedules set out the Statutory Provisions under which the school is required to retain the information.

A copy of those schedules can be located using the following link:

<http://irms.org.uk/page/SchoolsToolkit>

**Transferring data internationally**

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

**What are your rights with respect of your personal information?**

Under data protection law, staff members have the right to request access to information about them that we hold. To make a request for your personal information you can contact either:

* Amanda Scott, a Campion School GDPR Champion
* The School’s Data Protection Officer\*\* at Warwickshire Legal Services via email at [schooldpo@warwickshire.gov.uk](mailto:schooldpo@warwickshire.gov.uk)
* Campion School’s Data Protection Officer\*\*

Warwickshire Legal Services

Warwickshire County Council

Shire Hall

Market Square

Warwick CV34 4RL

\*\***Please ensure you specify which school your request relates to**.

You also have the right to:

* object to the processing of personal data that is likely to cause, or is causing, damage or distress
* prevent processing for the purpose of direct marketing
* object to decisions being taken by automated means
* in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed;
* claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner’s Office at <https://ico.org.uk/concerns/>

**Review**

The content of this Privacy Notice will be reviewed in September 2024.