

DATA PROTECTION PRIVACY NOTICE TO STAFF, VOLUNTEERS, CONTRACTORS AND THIRD PARTIES

Title	DATA PROTECTION PRIVACY NOTICE TO STAFF, VOLUNTEERS, CONTRACTORS AND THIRD PARTIES
Version	2.0 November 2023
Created	Governance Committee/Data Protection Lead
Validity	Staff, Volunteers, Contractors and Third Parties (excluding pupils and parents/guardians)
Next review date	if required

1. General Statement of the school's Duties

The school is required to collect, store and process relevant personal data of staff, volunteers, contractors and third parties (referred to as "data subjects") as part of its operations. The school is a "data controller" for the purposes of data protection law.

Individuals have a right to be informed about how the school uses any personal data it holds about them. This "privacy notice" explains how we collect, store and use personal data about staff, volunteers, contractors and other third parties.

Processing includes obtaining, recording, holding, disclosing, destroying or otherwise using data. It also includes any operation or set of operations on the data including organising, amending, retrieving and using the data.

2. The Data Protection Principles:

The school complies with Data Protection Principles. According to these principles, personal information must be processed in accordance with the following standards:

- a) lawfully, fairly, and transparently
- b) collected for specific purposes and not used in a way that is inconsistent with those purposes
- c) relevant and limited to what is necessary for the intended purposes
- d) accurate and kept up to date
- e) kept for no longer than necessary, with the exception of archiving purposes
- f) processed securely to prevent unauthorized processing or loss or damage to personal information

3. Personal Data the school holds

“Personal data” is information, which relates to a living individual who can be identified from that data, or from that data and other information, which is likely to come into the possession of the data controller.

The school processes a wide range of personal data of their data objects as part of its operation.

This personal information includes (but is not limited to):

- Contact details
- Dates of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank details, payroll records, tax status information and National Insurance Number
- Recruitment information, including copies of references and other information included in the CV or covering letter as part of the application or contracting process
- Qualifications and employment records, job titles, training records and professional memberships
- contract details
- Outcomes of any disciplinary or grievance procedures
- Absence data
- Complaints
- Copy of passport and/or ID and driving licence
- Photographs; videos and other media
- Email correspondence with the school
- Attendance information
- CCTV images captured in school
- Responses to surveys and questionnaires conducted by the school

Special category data includes information such as racial or ethnic origin, political opinions, religious or philosophical beliefs, biometric data, sexual orientation, trade union membership, genetic data and health information and if applicable, criminal offence data. This data is treated with even greater care than other personal data.

4. Why the school uses the data

The school processes personal data for multiple reasons related to its business operations. This includes collecting data for providing education and training services, as well as pastoral, welfare and educational support services. The school also processes data for recruitment and promotion decisions, payment purposes, staff training and development, and to comply with legal obligations related to data sharing and workforce management. In addition, the school uses CCTV to maintain premises security and prevent and investigate crime. Other purposes for data processing include supporting effective performance management, improving the management of workforce data across the sector, and conducting research and surveys to assess the quality of the school's services. The school may

receive data from individuals directly, as well as from other sources such as examination boards, medical professionals, and other schools.

5. Processing of Personal Data

All personal information that satisfies the definition of personal information and is not otherwise exempt will be treated in confidence and will only be provided to third parties with the appropriate care as required by law.

6. Special category data

The school may be required to process special category data, including criminal offence data regarding staff.

The school processes special category data where this is necessary for the purposes of its provision of education and training (including the monitoring of the effectiveness of its services), pastoral, welfare and educational support services, recording sickness absence, assessing fitness to work, making reasonable adjustments, administering sick pay, equalities monitoring, to administer school property services and cafeteria services, to maintain its accounts and records, to assess the quality of the school's services, to carry out research, to comply with the law regarding data sharing and to support and manage its staff. The school will take careful measures to safeguard the right to data protection. This includes the secure storage of such data on its site, and the encryption of any electronic documents shared externally.

7. The school's legal basis for using this data

The school relies on UK GDPR Article 9(2)(b) in order to process special category data of staff: "when processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law."

8. How the school stores this data

The school keeps personal information about staff in an employment file for each staff member. The information contained in this file is kept secure and is only used for the purposes directly relevant to your employment.

Once employment has ended, it will retain the file and delete the information in it in accordance with its records management schedule/policy. On request, the school can provide a copy of its record retention management schedule.

The school keeps personal information about contractors and third parties for as long as it is reasonably required in order to fulfil the contractual and/or other lawful purpose for which the data was collected.

9. Sharing data

The school may share information with a number of organizations, including local authorities, government agencies, suppliers, organizations that support health and social welfare, employment

and recruitment agencies, financial organizations, police forces, courts, tribunals, and survey and research firms.

In addition, the school shares data and photographs of its public events and of school life by placing them on the school's website and its social media platforms or in the school's brochure. The school's policy is not to include personal data of individuals in such external publications without their consent, nor to publish photographs of lessons or internal school activities without consent. The annual yearbook, made available to purchase internally to the school community, contains staff photographs, and their inclusion is considered in the school's legitimate interests. As regards to photographs of school events, which are open to the public, it may not, however, be practicable to ensure that each and every person there depicted has consented to the photograph being published. The school will, nevertheless, take reasonable efforts to ensure that such publications do not unduly infringe the privacy of any individuals attending those events.

From time to time, the school may receive requests from third parties to disclose personal data it holds about staff, volunteers, contractors or third parties. The school confirms, that it will not generally disclose information unless the individual has given their consent or one of the specific exemptions under the GDPR applies. However, the school does intend to disclose such data as is necessary to third parties for the following purpose:

- To give a confidential reference relating to a member of staff or contractor to any educational institution which the member of staff or contractor has applied to.

Where the school receives a disclosure request from a third party it will take reasonable steps to verify the identity of that third party before making any disclosure. Whenever possible, individuals will further be notified prior to disclosing any information about them to third parties.

10. Transferring data internationally

International transfers of personal data only occur where data servers are located outside of the UK and we refer to safeguards provided by Microsoft and the German Foreign Office.

11. Rights of Access

Individuals are entitled to access their personal data that the school has on file. Individuals can write to the DPL to request access. Access to some information is prohibited, including information that could be used to identify someone else or cause them grief.

The school acknowledges that an individual may have the right of access to a reference relating to them received by the school. However, such a reference will only be disclosed if such disclosure will not identify the source of the reference or where, notwithstanding this, the referee has given their consent or if disclosure is reasonable in all the circumstances.

12. Other Rights

According to data protection law, individuals have a number of rights, such as the ability to stop direct marketing, object to automated decision-making, amend faulty data, and seek damages for data

breaches if the use of their personal data would cause them harm. Individuals also have the right to be forgotten, to restrict and to object to data processing.

13. Accuracy

The school endeavors to keep personal data accurate and up-to-date, and individuals can request changes.

14. Security

Reasonable steps will be taken to ensure, that only relevant personal information will be accessible to staff and will be protected from unauthorized access.

15. Enforcement

Complaints can be directed to the Data Protection Lead Barbara Johannis.

Barbara.johannis@dslondon.org.uk

Alternatively, the individual can make a complaint to the Information Commissioner's Office.

- Report a concern online at <https://ico.org.uk/concerns>
- Call 0303 123 1113
- Write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

16. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact the data protection lead:

Barbara Johannis, German School Association Ltd. Douglas House, Petersham Road, Richmond TW10 7AH, UK. barbara.johannis@dslondon.org.uk +44 (0)208 940 2510.