

Privacy Notice

(For all staff, volunteers, contractors and Council members)



WYCOMBE
ABBEY

This privacy notice refers to all activities undertaken by the Girls' Education Company Limited, Registered Charity No 310638 trading as Wycombe Abbey; and its subsidiary companies (referred to as "Us" or "We").

In the course of your employment, engagement, application or other basis of work undertaken for us, we will collect, use and hold ("process") personal data ("information") relating to you. This makes the us the data controller of your personal information, and this Privacy Notice sets out how we will use that information and what your rights are.

1. Who this privacy notice applies to

All staff, peripatetic teachers, casual workers, temporary personnel, volunteers and contractors who may be employed or engaged by us to work in any capacity, as well as prospective applicants and former employees. It also applies to members of Council.

Please note that any even if this notice applies to you, references to "employment" or "staff" in this Notice are not intended to imply any employment rights on you if you are a contractor, non-employed worker or job applicant.

This notice is not aimed at pupils, or parents of pupils (whether current, past or prospective) or other members of the public, nor does it inform you how to handle personal information of others. This information may be found in the School's *Privacy Notice for Parents and Pupils*, which provides further details about how personal information will be used by us, and the staff *Data Protection Policy* respectively.

2. About this notice

This Privacy Notice explains how we collect, use and share (or "process") your personal information, and your rights in relation to the personal information we hold.

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

- any contract between us and you, such as the terms and conditions of employment, and any applicable staff handbook;
- the CCTV policy;
- the safer recruitment policy;
- the disciplinary, safeguarding, staff code of conduct, anti-bullying, or health and safety policies, including as to how allegations, low-level concerns or incidents are reported or recorded (both by and about staff);
- the data protection and data retention policy; and
- the IT related policies, including the acceptable use of IT policy, social media, bring your own device policy, home working policy, AI Policy and online safety policy.

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

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

3. How we collect your information

We collect your personal information in a number of ways, for example:

- from the information you provide to us before making a job application, for example when you come for an interview;
- when you submit a formal application to work for us, and provide your personal information in application forms, self-declaration forms and covering letters, etc.;
- from third parties, for example the Disclosure and Barring Service (DBS) and referees (including your previous or current employers or school), in order to verify details about you and/or your application to work for us;
- from third party websites as part of online suitability checks through social media searches and reference requests as part of our duty under safer recruitment; and
- for contractors, or substitutes, your own employer or agent.

More generally, during the course of your employment or contract with us, we may collect information 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 our 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.

4. Types of personal information we collect

We may collect the following types of personal information about you (and your family members, resident family members, emergency contacts 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, emergency contacts 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, where documented on your CV or application, through internet searches prior to interview, mentioned at interview or during appraisal;
 - your interests and extra-curricular activities, where documented on your CV or application, mentioned at interview or during the appraisal;
 - information in the public domain, including information you may have posted to social media, 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 invoice and processing other payments);
 - your tax status (including residence status);
 - residence status via passport or visas;

- Gift Aid declaration information, where relevant;
- 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 (including start date, working hours, training records and performance, 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 us;
 - 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 School, where relevant (for example, where you have asked us to keep in touch with you or provide references);
 - driving license information where you are driving our vehicles or pupils in your own vehicle;
 - car registration numbers to manage car parking arrangements and security purposes;
 - nationality and other immigration status information (i.e. about your entitlement to live and work in the UK), including copies of passport information (if applicable).
- and any other information relevant to your employment or other engagement including disciplinary, grievances, and appraisals.

Where this is necessary for your employment or other engagement, we may also collect **special categories of information**, and information about criminal convictions and offences, including:

- information revealing your racial or ethnic origin;
- information concerning your health and medical conditions (for example, where required to monitor and record sickness absences, dietary needs, for driving on school business or to make reasonable adjustments to your working conditions or environment);
- biometric information where necessary;
- information concerning your sexual life or orientation (for example, in the course of investigating complaints made by you or others, for example concerning discrimination); and
- information about certain criminal convictions (for example, where this is necessary for due diligence purposes, whether by self-declaration or otherwise 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 us. Where we process special category data or criminal offence data, we will identify an appropriate lawful basis under UK GDPR and, where required, a relevant special category or criminal offence condition under the Data Protection Act 2018. Where required, the School will also maintain an appropriate policy document explaining how it protects this information and complies with the relevant legal conditions.

5. The basis for processing your personal information, how that information is used and whom it is shared with

(i) *Entering into, or fulfilling, our contract with you*

We process your personal information 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, we use your personal data for the following:

- administering job applications and, where relevant, offering you a role with us;
- carrying out due diligence checks, 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, health insurance) in connection with your employment or other engagement with us;
- monitoring your attendance and your performance in your work, including in probationary and performance appraisals;
- monitoring your use of our IT systems to ensure compliance with our policies (including the Acceptable Use of IT policy);
- to assess and make decisions about your fitness to work, training and development requirements;
- promoting the School to prospective parents and others, including by publishing the work product(s) you create while employed by or otherwise engaged to work for us;
- 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, incident reporting; and
- for any other reason or purpose set out in your employment or other contract with us.

(ii) Legitimate Interests (as recognised by law or determined by the School)

We process your personal information because it is necessary for our (or sometimes a third party's) legitimate interests. Our "legitimate interests" include our interests in running the School 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, we use your personal information for the following:

- providing 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 (See the *CCTV Policy*) and access control systems in various locations on the School's premises;
- for purposes of communications in the event of an emergency situation, such as snow/inclement weather effecting the School and routes into School, notification of the School in lockdown, internal road closure;
- to enable relevant authorities to monitor the School'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 school 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;
- making travel arrangements on your behalf, where required;
- contacting you or your family members and 'next of kin' for business continuity purposes, to confirm your absence from work, in the event of an accident etc.;
- using your image and likeness where this is reasonably connected with your role or engagement with us, such as staff identification, internal communications, safeguarding, security or operational purposes. Promotional, marketing or publicity use will be considered separately and, where appropriate, will be based on consent or another lawful basis notified to you;

- to monitor (as appropriate) use of our IT and communications systems in accordance with our *Online Safety policy*, *AI Policy* and *Acceptable Use of IT policy* and government guidance such as Keeping Children Safe in Education (KCSIE);
- to maintain an archive record for ongoing research value, archiving in the public interest and used for historic, scientific or statistical research.

(iii) Legal Obligations

We also process your personal information 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, we use your personal data for the following:

- child welfare (including 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;
- compliance with our data protection obligations, including responding to subject access requests. Where a request includes personal data about both the requester and another person, including a member of staff, we will consider whether disclosure is lawful and reasonable in the circumstances. This may include considering the nature of the information, the requester's right of access, any duty of confidentiality, the role or reasonable expectations of the staff member, whether consent has been sought or obtained where appropriate, and whether redaction or partial disclosure is necessary; and
- 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.

(iv) Special categories of information

Depending on your role we process special categories of personal information (such as information concerning health, religious beliefs, racial or ethnic origin, sexual orientation or union membership) or criminal convictions and allegations 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 health, 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;
- categories of your personal data which are relevant to investigating complaints made by you or others, for example concerning discrimination, bullying or harassment, or as part of a complaint made against the School;
- 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;
- information 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 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 information only where we have both a lawful basis under UK GDPR and an additional condition for processing special category data. Where we process criminal offence data, we will do so only where authorised by law. These reasons may include:

- 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 to establish the truth of any such allegations); or
 - to cooperate with a relevant authority, professional or regulatory body in such matters.
- to comply with public health requirements (e.g. in respect to a pandemic or 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.

v) Neutral notifications and Low-Level Safeguarding concerns

We will process personal data about you, whether or not it constitutes special category data in accordance with our policy on recording and sharing neutral notifications and low-level safeguarding concerns about adults as described in the *Safeguarding and Child Protection Policy*. This will be processed for the same safeguarding and/or employment law reasons as set out above.

Such records are subject to the same rules on retention, 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, if we consider that compliance with the request might unreasonably impact the privacy of others, prejudice safeguarding or disciplinary processes, or give rise to a risk of harm to children.

As a general rule, records of low-level concerns will be kept at least until the termination of your employment but may need to be retained longer where relevant, individually or cumulatively, to any employment, disciplinary, safeguarding or regulatory matter, and in accordance with the School's Data Management and Retention of Records Policy. 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.

6. 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 information with certain third parties. We may disclose limited personal information (including in limited cases special category or criminal information) to a variety of recipients including:

- other employees, agents and contractors (e.g. third parties processing data on our behalf as part of administering the provision of benefits including pensions, IT etc. – although this is not sharing your personal information in a legal sense, as these are considered data processors on our behalf);
- DBS and other government authorities and, local authority and/or appropriate regulatory bodies. Such as the Department for Education, Teacher Regulation Agency, the Home Office, UKVI, relevant public health / NHS agencies, HSE, the ICO, Charity Commission and the local authority;

- third-party background checks;
- 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;
- third parties and their advisers in the unlikely event that those third parties are acquiring or considering acquiring all or part of our School, or we are reconstituting or setting up some form of joint working or partnership in the UK or abroad;
- when we are 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.

7. How long your information is kept

Personal information relating to unsuccessful job applicants is deleted within twelve 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).

For employees, 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 of employment (or equivalent agreement) has expired or has been terminated.

However, some information may be retained for longer than this. For example, incident reports, neutral notifications, low level concerns and safeguarding files, in accordance with specific legal requirements. Please see our *Data Management and Retention of Records policy*.

Information held within the Archive Records will be for historic record only and will not be used for decision-making purposes about an individual.

YOUR RIGHTS - What decisions can you make about your information

Rights of access

As Individuals you have various rights under Data Protection Law and UK GDPR to access and understand what personal information is held by us, and in some cases ask for it to be erased or amended or have it transferred to others, or for us to stop processing it but subject to certain exemptions and limitations.

If you wish to access or amend your personal information or wish it to be transferred to another person or organisation, or you have some other objection to how your personal information is used, you should put your request in writing to the Head of Compliance.

We will respond to any such written requests as soon as reasonably practicable and within the statutory time limit. In most cases, this will be one month from receipt of the request, although this period may be extended where permitted by Data Protection Law, for example where a request is complex or where multiple requests have been made.

We will be better able to respond quickly to smaller, targeted requests for information. We may ask you to clarify or narrow a request where this is reasonably necessary to help us identify the information sought. If a request is manifestly unfounded or excessive, or is similar to previous requests, we may refuse the request or charge a reasonable fee, but only where Data Protection Law allows it.

Requests that cannot be fulfilled

You should be aware that the right of access is limited to your own personal data, and certain information is exempt from the right of access. This will include information which identifies other individuals, or information which is subject to legal privilege (for example legal advice given to or sought by us, or documents prepared in connection with a legal action).

We are not required to disclose nor share any confidential reference given by the School itself for the purposes of the education, training or employment of any individual.

You may have heard of the “right to be forgotten”. However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal information: for example, legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

Consent

If we are relying on your consent as a means to process personal information, you may withdraw that consent at any time.

Examples where we do rely on consent to hold information are:

- Use of images for promotional marketing or publicity purposes, where consent is the appropriate lawful basis.
- Former staff, details about their careers and employers.
- Email communications permission for Seniors and Friends of Wycombe Abbey groups.

Please be aware however that we may have another lawful reason to process the personal information in question even without your consent. That reason will usually have been asserted under this Privacy Notice or may otherwise exist under some form of contract or agreement with you.

Whose rights?

Data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing right.

The rights under Data Protection Law belong to you, the individual, to whom the information relates. However, we will often rely on employment contract, legislation or notice for the necessary ways we process personal information relating to you.

All staff are required to respect the personal information and privacy of others, and to comply with the Acceptable IT Use Policy and the Data Protection Policy.

What decisions can you make about your information

- if information is incorrect, you can ask us to correct it;
- you can ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to;
- you can ask us to delete the information that we hold about you in certain circumstances, e.g. where we no longer need the information;
- you can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer;

- our use of information about you may be restricted in some cases, e.g. if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.

DATA ACCURACY AND SECURITY

We will endeavour to ensure that all personal information held in relation to you is as up to date and accurate as possible. You must please notify us of any significant changes to important information, such as contact details. Staff can do this through the online HR portal WHR or by contacting the HR Department.

You have the right to request that any out-of-date, irrelevant or inaccurate information about you is erased or corrected (subject to certain exemptions and limitations under Data Protection Law). Please see above for details of why we may need to process your information, of who you may contact if you disagree.

We will take appropriate technical and organisational steps to ensure the security of personal information about individuals, including policies around use of technology and devices, and access to School systems. All staff, volunteers and governing council members will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

This notice

We 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, you may contact the Head of Compliance by email at complianceoffice@wycombeabbey.com.

If you believe that the School has not complied with this Privacy Notice or has otherwise failed to comply with data protection law, and you wish to make a complaint, you should email complianceoffice@wycombeabbey.com with details of your complaint. We 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 we have not handled it appropriately, you have the right to complain to the Information Commissioner: www.ico.org.uk.

The Information Commissioner's Office (ICO) is responsible for enforcing data protection law. Our ICO registration numbers are:

Girls' Education Company Limited – Z5311880;

Wycombe Abbey Services Limited - ZB014569;

Wycombe Abbey Foundation – ZC124088

Member of staff

Bursar

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Related Policies:

Data Protection Policy
Data Management and Retention of Records Policy
CCTV Policy
Safeguarding and Child Protection Policy
Safer Recruitment Procedures
Acceptable Use of IT
Online Safety Policy
AI Policy