



THE MOUNTBATTEN SCHOOL

Privacy Notice for Staff

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our school.

We, The Mountbatten School, are the 'data controller' for the purposes of Data Protection Law and as such, are registered with the ICO and comply with the principles of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Our data protection officer can be contacted via dpo@mountbatten.school

The Personal Data we hold

We process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- personal information (such as name, date of birth, employee number)
- contact details such as address, telephone numbers, next of kin and other contacts
- recruitment information including application form and associated references
- copies of documents verifying identity and address and 'Right to Work' in the UK
- DBS certificate number, outcome and issue date including CBL Check. Check on HCC Referral database. If relevant an overseas police check; NCTL check. Prohibition from Management check s128 check;
- special categories of data including characteristics information such as gender, age, ethnic group, disability
- contract information (such as start dates, hours worked, post, roles and salary information)
- performance information
- outcomes of any disciplinary and/or grievance procedures
- work absence information including annual leave records
- academic and professional qualifications (and, where relevant, subjects taught); evidence of QTS and NQT induction certificate
- bank account details and payroll records such as NI number and tax status information, pension and benefits information, tax codes, mileage and expenses claims

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- transport information (details of car, insurance and where post requires copy of driving licence)
- Photographs
- CCTV footage
- Data about your use of the school's information and communications system
- Biometric Data for the cashless catering system
- Data processed through school authorised Artificial Intelligence tools and cloud platforms

From time to time, we may also get additional information such as:

- Travel documentation (passport and GHIC/EHIC information)

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation
- Health including any medical conditions and sickness records
- Trade union membership

Why we collect and use this information

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

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards students
- Support effective performance management
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring
- Improve the management of workforce data across the sector
- Health or Social Care purposes
- Support the work of the School Teachers' Review Body
- Contact staff or their next of kin in case of emergency
- Facilitate certain educational visits
- To protect staff welfare and carry out safeguarding activities

The lawful basis on which we use this information

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

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General Data Protection Regulations

- Article 6(1)(e) (Public Task) the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- Article 9(2)(g) – the processing is necessary for reasons of substantial public interest.
- Article 6(1)(f) – the processing is necessary for the purposes of the legitimate interest of the controller, for the operation of CCTV for security and crime prevention
- Article 6(1)(d) (Vital Interests): Sharing medical information in an emergency
- Article 6(1)(a) (Consent): For optional processing such as promotional photography or biometric data.

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 go about withdrawing consent if you wish to do so.

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

Collecting this information

While most of the information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Storing this data

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

Personal data is stored on school-approved, secured platforms, including Google Workspace for Education and Microsoft 365.

We maintain security through mandatory Multi-Factor Authentication (MFA) for all administrative, remote, and cloud-based accounts.

The school utilizes authorized AI tools to support learning; however, in accordance with our Acceptable Use Policies, personal or sensitive data is strictly prohibited from being input into unauthorized AI platforms.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our Record Retention Schedule.

Key retention periods include:

CCTV Images: 31 days.

Staff personnel file: Termination + 6 years.

Payroll Records: current tax year + 6 years.

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Recruitment Records: For unsuccessful applicants, retained for 6 months
Child Sexual Abuse Records: DOB + 75 years

Who we share this 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:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- The Department for Education
- Your family or representatives
- Educators and examining bodies
- Our regulator, Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll
- Financial organisations and Pension Bodies
- Central and local government
- HMRC
- Our auditors
- Trade unions and associations
- Health authorities
- Security organisations
- Occupational Health
- NHS
- Professional advisors and consultants
- Police forces, courts, tribunals
- Professional bodies
- Other staff members for emergency contact reasons

In addition, we sometimes share information with:

- Tour operators associated with school trips

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 and ensure adequate protection is in place through standard contractual clauses or other legally recognised safeguards.

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Data collection requirements:

The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

The department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested; and
- the arrangements in place to securely store and handle the data

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

To contact the department: <https://www.gov.uk/contact-dfe>

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold.

How to access personal information we hold about you

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Individuals have a right to make a 'subject access request' (SAR) to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will respond to requests for access to personal data, including CCTV footage, within one calendar month. This may be extended by a further two months for complex cases, in which case you will be notified within the first month.

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our data protection officer.

Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing.
- Claim compensation for damages caused by a breach of the data protection regulations

Right to Rectification: If you identify inaccurate data, we will respond to your request for correction within one month. This may be extended by a further two months for complex cases, in which case you will be notified within the first month.

Rights to Restrict Processing: you have the right to suppress the processing of your personal data. This allows the school to continue holding the data but prevents any further use of it while we consider requests for rectification or objections to processing.

Rights to Withdraw: To withdraw consent for optional processing (such as biometrics or photography), please contact the Data Protection Officer in writing via dpo@mountbatten.school

The school does not currently use automated decision-making or profiling to make significant decisions about staff.

To exercise any of these rights, please contact our data protection officer.

For requests regarding non-personal school information, please refer to our Freedom of Information Policy.

Complaints

We take any complaints about our collection and use of personal information very seriously.

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If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance. To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

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

Contact

If you would like to discuss anything in this privacy notice, please email for the attention of the Data Protection Officer via dpo@mountbatten.school

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