



# Solefield School

## **PRIVACY & TRANSPARENCY NOTICE**

*for staff, visiting music teachers, visiting sports coaches, club coordinators, volunteers and other visitors*

### ***How we use your personal information***

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## Introduction & Key Facts

1. This notice is aimed at all *staff, visiting music teachers, visiting sports coaches, club coordinators, volunteers and other visitors* and explains how the School uses Personal Data that is covered by European & UK data protection legislation. The School may amend this statement at any time.
2. The purpose of the legislation is to safeguard information about individuals and covers issues such as data security, an individual's rights to access their Personal Data and the use, retention and disclosure of Personal Data by others.
3. The School is a **Data Controller** under the legislation and holds **personal information** or data about staff, volunteers and visitors. This data is held on a computer or is held in a file by reference to specific criteria concerning an individual.
4. Personal information might include information such as date of birth and contact details as well as things like qualifications, previous employment history, financial details, medical conditions and appraisal and discipline records. The School may also record information about a person's religion or ethnic group. CCTV, photos and video recordings of you are also personal information.
5. We collect this data to help the School run properly and safely.
6. We endeavour to keep all data up to date. If you are aware of any discrepancies please contact us so we can correct the information we hold.
7. We will use data only for purposes described in this notice and destroy it when we no longer need to retain it.
8. Sometimes we need to share data for the purposes described below.
9. When a member of staff leaves the School some data might be passed to a future employer.
10. As a school we have to comply with various laws and this entitles us to use your information where necessary.
11. Unless this would be unfair to you, we have a legitimate interest in using your information in order to:
  - 11.1 educate the children in our care;
  - 11.2 look after your welfare and the welfare of others when at School; and
  - 11.3 promote and develop the School so that it continues to be successful.
12. If you object to us using your information where we are relying on our legitimate interests as explained above, or if you require any further information please speak to Mr Coston.
13. If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office: [ico.org.uk](https://ico.org.uk).

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## **What Personal Information or Data the School holds and how it is acquired**

14. Examples of the Personal Data which the School holds about staff, volunteers and visitors include:
  - 14.1 information gathered during the recruitment process such as contact details, financial details, information about previous employment or voluntary work, reasons for leaving previous establishments, qualifications, other achievements, attendance and medical information;
  - 14.2 personal characteristics such as ethnic group, any special educational needs as well as relevant medical information;
  - 14.3 information received from the local authority, previous employers, HMRC or other governmental agencies such as the Department for Education (DfE) or the National Health Service;
  - 14.4 other information such as photographs and voice or video recordings.
15. The School may process sensitive personal data relating to staff and volunteers including,
  - 15.1 information about attendance, including any disciplinary matters, and physical or mental health conditions in order to ensure the wellbeing of staff and volunteers and to take decisions regarding their time at school; and
  - 15.2 information about protected characteristics of staff in accordance with the School's Equal Opportunities Policy in order to monitor compliance with equal opportunities legislation.
16. The School may acquire Personal Data in a number of ways. For example:
  - 16.1 Staff and volunteers may provide the School with Personal Data about themselves and their families, for example, during the recruitment process;
  - 16.2 Personal Data may be created internally by the School during the course of their time at the school. An email from the Headmistress to the Deputy Head about a particular teacher's appraisal would be an example of this; and
  - 16.3 Personal Data may be acquired from outside of the School community such as from other schools, public authorities and public sources.

## **Why Does the School Collect Personal Information & What Do We Do With It?**

17. We collect Personal Data to help the School run properly, safely and to let others know what we do here.
18. In respect of staff and volunteers, the School commonly uses Personal Data for:
  - 18.1 ensuring that the School provides a safe and secure educational environment conducted outside the State system, safeguarding and promoting the welfare of all people in the establishment;

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- 18.2 providing educational services including training and support whether educational, medical or pastoral including, for example, registering and monitoring attendance on CPD courses such as Educare;
  - 18.3 protecting and promoting our interests and objectives - this includes the organisation of alumni associations and events for fundraising purposes;
  - 18.4 administrative, operational and management purposes and to enable the School to meet its legal obligations as an educator and employer. For example, to monitor staff performance and progress, ensuring health & safety, administering school property and library services;
  - 18.5 supporting and managing our staff; and
  - 18.6 fulfilling our contractual and other legal obligations including assessing the quality of our services.
19. We are required, by law, to pass certain information about our staff, volunteers and visitors to the Local Authority and the Department for Education (DfE) and other statutory agencies. We will not give information about our staff to anyone without your consent unless the law or our policies allow us to do so and it considers it is reasonable and fair to do so in the given circumstances.
  20. The School may use Personal Data for other purposes where the legislation allows and where providing an explanation would not be appropriate. For example, this includes sharing Personal Data about staff with the relevant statutory agencies investigating allegations of misconduct or for the prevention and investigation of crime and the prosecution of offenders.

### **Specific examples of data use**

21. **CCTV:** The School uses CCTV recordings for the purposes of crime prevention and investigation and also in connection with its obligation to safeguard the welfare of pupils, staff and visitors to the School site. CCTV recordings may be disclosed to third parties such as the police but only where such disclosure is in accordance with the Act. We may use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms.
22. **Photographs and video recordings:** The School may use photographs and video recordings for marketing and promotion purposes including in School publications, in social media and on the School website. The School may also allow external publication of media where appropriate (for example, in a local newspaper). The School may also make recordings or ask a third party to do so, for teaching purposes, for example, recording a lesson to provide feedback to staff during their appraisal or for training purposes.
23. **Software and other technologies including social media:** The School uses software which monitors e-mails and internet browsing activities at school. For example, any e-mail sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with school policy. E-mail monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us or when using any school e-mail account is within the bounds of the law. The

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School also operates some social media accounts such as Twitter and Facebook. If you send us a private or direct message via social media the message may be stored by the host site who is a third party. We use a third party provider, 360 to manage and host our website and to provide secure access via staff password to the protected area of the website and therefore disclose relevant contact data to them. Any disclosure of sensitive information will be done in accordance with the legislation.

24. Mobile phones, are only brought into school by pupils with the Headmistress' permission, are handed in at the school office on arrival and collected by the pupil on departure.
25. **PASS & ParentMail systems:** The School uses software to manage contact information and will share sensitive data with third party companies in order to ensure the smooth operation of these systems. Any disclosure of sensitive information will be done in accordance with the legislation.
26. **Overseas Transfers:** It may sometimes be necessary to transfer personal information overseas. When this is required, information may be transferred to countries or territories around the world. Any transfers made will be in full compliance with all aspects of the relevant legislation.
27. **Biometric Data:** Currently we do not hold any biometric data, i.e. fingerprints, of any person.
28. **Alumni:** We may keep details of your address when you leave so we can send you information, including for fundraising purposes, however, we never share this information with third parties for fundraising purposes.
29. **School trips:** We may share some information with our insurance company or travel company to make sure that we have the bookings and insurance cover that we need. We may need to share information with the police or our legal advisers if something goes wrong or to help with an inquiry. For example, if a colleague or one of the pupils in your care is injured on a trip.

#### **Our legal ground for using your information**

30. As a school we have to comply with various laws and this entitles us to use your information where necessary. For example, we are required by law to ensure that your working environment is safe and that we have made any reasonable adjustments that might be required due to any declared disability or illness.
31. Unless this would be unfair to you, we have a legitimate interest in using your information in order to:
  - 31.1 educate the pupils in our care;
  - 31.2 look after your welfare and the welfare of others; and
  - 31.3 promote and develop the School so that it continues to be successful.
32. We also use your information in order to provide education, which is in the public interest.
33. We may need to use your information in connection with legal disputes.

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34. We have a contract of employment with you. We are allowed to use information about you where this is necessary to comply with our contractual obligations.
  35. We may ask for your consent to use your information in certain ways. If we ask for your consent to use your personal information you can take back this consent at any time. Please speak to Mr Coston if this applies.
  36. We are allowed to use your information in an emergency, for example, if you require urgent medical attention and are not able to provide this information to the emergency services.
  37. We may use information about you if we need this for historical, research or statistical purposes.

**For how long do we keep your information & what do we do when we have finished with it?**

38. We keep your information for as long as we need to in order to educate and look after the pupils in our care and to comply with any legislative requirements. We will keep certain information after you once you have left the School, for example, so that we can find out what happened in the event of a complaint about an incident in which you were involved. The norm is to keep relevant information about pupils until a child is 25 years old.
39. We can keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes.
40. When a child leaves, if there is any safeguarding information it is passed on to the child's next school. In certain circumstances, although unlikely, this might include information about staff, volunteers or visitors.
41. When we no longer require your information it is destroyed and disposed of securely, whether it is held digitally or in paper form.

**Further information and guidance**

42. Mr Coston is the person responsible at our School for managing how we look after personal information and deciding how it is shared. Mr Coston can be contacted at [r.coston@solefieldschool.org](mailto:r.coston@solefieldschool.org). Like other organisations, we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.
43. Please contact Mr Coston if:
  - 43.1 you object to us using your information where we are relying on our legitimate interests as explained above;
  - 43.2 you object to us using your information for marketing purposes;
  - 43.3 you would like us to update the information we hold about you;
  - 43.4 you would prefer that certain information is kept confidential; or
  - 43.5 you have any questions relating to the above.

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44. The School is registered with the Information Commissioners Office the details of which can be viewed via their website. If you consider that we have not acted properly when using your or your child's personal information you can contact the Information Commissioner's Office: [ico.org.uk](http://ico.org.uk).
  45. We keep our privacy notice under regular review. This privacy notice was last updated on 24<sup>th</sup> August, 2018.