



# THE ORATORY

## PRIVACY NOTICE - STAFF

### 1. INTRODUCTION

The Oratory School is a registered charity. Our registered charity number is 309112. We take our responsibilities as a data controller seriously and we are committed to using the personal data we hold in accordance with the law.

This privacy notice provides detailed information about how we process personal data. Please read it carefully and, if you have questions regarding your personal data or its use, please contact our Data Protection Officer:

Judicium Consulting Limited  
Address: 72 Cannon Street, London, EC4N 6AE  
Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)  
Web: [www.judiciumeducation.co.uk](http://www.judiciumeducation.co.uk)  
Telephone: 0345 548 7000  
Lead Contact: Craig Stilwell

### 2. PURPOSE

This **Privacy Notice** is intended to provide information about how the school will use (or "process") personal data about: its staff (this includes contractors and self-employed staff).

This **Privacy Notice also** applies in addition to the school's other relevant terms and conditions and policies, including:

- any contract between the school and its staff;
- any policies or notices applicable to staff concerning the handling of personal data;
- the school's policy on taking, storing, and using images;
- the school's CCTV and/or biometrics policy;
- the school's retention of records policy;
- the school's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the school's IT policies

Please note that your contract with the School, including any document or policy forming part of your contractual obligations to the School may supplement the information in this Staff Privacy Notice, to the extent that it will contain details of obligations or rights of the School under contract with you which may require the use of your personal data.

### 3. TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

We process personal data about staff and their family members to include next of kin, where relevant.

The personal data we process takes different forms – it may be factual information, expressions of opinion, images or other recorded information which identifies or relates to a living individual. Examples include:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- biometric information, which will be collected and used by the school in accordance with the school's biometrics policy.
- bank details and other financial information, and any anti-money laundering information we are required to collect by law;
- personnel files, including in connection with academics, employment or safeguarding;
- nationality and other immigration status information (e.g., right to work)
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- Work related information such as references given or received by the school, your education provider, online resources, information from relevant professional bodies, the Home Office and from the DBS
- correspondence which you create while employed by or otherwise engaged to work for the School.
- your images engaging in school activities, and images captured by the school's CCTV system (in accordance with the school's policy on taking, storing, and using images of children);
- any other information relevant to your employment or your engagement to work for the School.

We may also collect special category personal data where this is necessary for your employment or other engagement to work for us and information about criminal convictions and offences, including:

- information revealing your racial or ethnic origin (usually anonymously);
- information concerning your health and medical conditions (for example, where required to monitor and record sickness absences, dietary needs, or to make reasonable adjustments to your working conditions or environment);
- information concerning your sexual 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, or 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 the School.

#### **4. PURPOSES FOR WHICH WE PROCESS PERSONAL DATA**

The School needs to process personal data about its staff for a number of administrative purposes:

- Managing HR processes such as recruitment, DBS, and other relevant employment checks to include references, relevant online checks, and employment history,

- Payments of salaries and pensions, performance management, training, and development
- Providing facilities such as the IT service, WIFI, and car parking provision
- Monitoring equal opportunities
- Preventing and detecting crime, such as using CCTV and using photographs
- Providing communications about School news and events
- Provision of wellbeing and support services
- Compliance with legal obligations such as making external/statutory returns.

The School processes special category personal data for a number of administrative purposes:

- Equal opportunities monitoring
- Managing Human Resources processes such as administering Sick Pay and Sick Leave schemes, managing absence, administering Maternity Leave and related pay schemes
- Managing a safe environment and ensuring fitness for work
- Managing obligations under Equal Opportunities legislation
- Provision of occupational health and wellbeing services to individuals.

The legal basis the School uses for holding this information is normally as a result of 'legitimate interest', in other words, the School needs this information in order to effectively manage the School. Some personal data will be held on a contractual basis or as a result of a statutory or legal obligation or to protect your vital interests (medical information, for instance). In these cases, the School is required to hold and process your information in order to perform its duties under its contract with you or in order to fulfil an obligation to a statutory body.

The School will process your information in accordance with Data Protection Law (the General Data Protection Regulation and the UK Data Protection Bill and any other applicable law) and its own Data Protection Policy. To comply with Data Protection Law, information about individuals must be collected and used fairly, stored safely and securely, be adequate, relevant, and not excessive, be kept accurate and up to date, held only as long as necessary and not disclosed to any third party unlawfully.

### **How do we use your information within the School?**

Within the School, personal data may be shared between colleagues who legitimately need the information to carry out their duties.

A member of staff's name, department/section, email address and telephone number will appear in The School's internal email and telephone directory. This information may also appear on the School's website. Staff photographs are used on SIMS/ iSAMS, email and staff ID cards for the purposes of identification and security.

The School may monitor computing use through usernames and logins to ensure adherence to the IT policies or for statistical purposes.

The School is required to obtain information about past criminal convictions as a condition of employment. The School also undertakes DBS and other pre-employment, and continuing checks required by the DfE and the Independent School Standards Regulations.

The amount of personal information shared within the School will be no more than is reasonably necessary.

### **How do we share your data with third parties?**

The School may need to share your personal and sensitive personal data with third parties

outside the School who are contracted to work on its behalf, for example to pension and payroll providers, insurers, or legal consultants. IT data might be used for testing purposes outside of the School. The School may also confirm dates and nature or details of an individual's employment to a prospective employer in a reference (these references are provided confidentially and are usually exempt from Subject Access Requests). In certain circumstances the School may pass the data of staff debtors to an external debt collection agency if the School has been unable to recover the debt by normal internal financial or HR processes.

The School may also have to share your personal data with other third parties outside the School for other purposes with your consent. However, there may be circumstances where information is shared without consent. This will only be if:

- There is a statutory obligation to share the data; for example, making returns to the local authority.
- Disclosure of non-special category personal data is required for the performance of a contract.
- Disclosure is necessary to protect your vital interests; for example, in medical emergency situations.
- Disclosure is made to assist with prevention or detection of crime, or the apprehension or prosecution of offenders.
- Disclosure is required by a Court Order
- Disclosure is necessary to assist the School obtain legal advice.

The School may occasionally need to share your special category personal data outside the School although it will try to do so only with your explicit consent. There may be some occasions when your consent is not gained. This will only be when processing is necessary to protect:

- Your vital interests and you cannot give your consent, or your consent cannot be reasonably obtained.
- Another person's vital interest and you have unreasonably withheld your consent.
- We cannot reasonably obtain your explicit consent.
- The processing is necessary to meet our statutory obligations in relation to equality and diversity monitoring.
- The disclosure is made for the purpose of prevention or detection of crime, the apprehension or prosecution of offenders and we have received a notice from the police confirming that the disclosure is required for these purposes.
- Pursuant to a Court Order requiring disclosure; or
- In order for The School to obtain legal advice or for the purposes of any legal proceedings.

### **How long is my data kept?**

Your personal data is kept by the School for as long as you remain an employee of the School. After this time, different legal retention schedules apply as detailed in the School's Data Retention Policy. In addition, for Safeguarding reasons, the current advice to Schools is that some information is kept indefinitely.

### **Your rights in relation to your data**

You have certain rights with respect to the data held about you by the School. You can

make a written request to obtain access to the data held about you by the School, subject to certain exemptions (a Subject Access Request).

You also have the right to have errors and omissions corrected or out of date or irrelevant information removed. Minor day-to-day requests for information and corrections can be taken up with your department manager or HR. If you wish to make a formal subject access request, please contact the School's Data Protection Officer.

If you have a concern about the way we are collecting or using your personal data, we ask that you raise any concerns with the School directly via the HR office or concerns relating to data to the School's Data Protection Officer. Alternatively, if you believe the School is not acting in accordance with Data Protection Law, you can contact the Information Commissioner's Office directly at <https://ico.org.uk/concerns/>

## **5. CHANGE OF DETAILS**

We try to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Please notify us of any significant changes to valuable information, such as contact details, held about you.

## **6. DATA ACCURACY AND SECURITY**

The school will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the Bursar/HR of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant, or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the school may need to process your data, of who you may contact if you disagree.

The school will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

## **7. THIS POLICY**

Our privacy notice should be read in conjunction with our other policies and terms and conditions which refer to personal data, including our Staff Employment Handbook to include the school's Acceptance Form and Terms and Conditions, our Safeguarding Policy, Health & Safety Policies, and IT Acceptable Use Policies.

We will update this Privacy Notice from time to time. Any substantial changes that affect how we process your personal data will be notified on our website and to you directly, as far as practicable.

### **Data Protection Officer**

The Data Protection Officer is responsible for overseeing data protection within the School so if you do have any questions in this regard, please do contact them on the information below: -

Data Protection Officer: Judicium Consulting Limited  
Address: 72 Cannon Street, London, EC4N 6AE

Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)  
Web: [www.judiciumeducation.co.uk](http://www.judiciumeducation.co.uk)  
Telephone: 0345 548  
7000

You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with us before involving them.

<b>Updates</b>	<b>Dated</b>	<b>By</b>
Data Protection Officer details updated	August 2024	Heidi Shuttleworth Director of People