

St Cuthbert Mayne School



Staff Privacy Notice

Last reviewed: 15.10.26

Next review date: 14.10.27

1. Introduction

St Cuthbert Mayne School is committed to protecting the privacy and security of the personal information we hold about our employees and other individuals who work for the school.

This privacy notice explains how we collect, use, store and share personal information about our staff, including teachers, support staff, senior leaders and other employees. It also applies, where relevant, to individuals working for the school on a temporary, casual, agency or voluntary basis, and to prospective and former employees.

The school processes personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable legislation.

This notice explains:

- What personal information we collect and hold.
- Why we collect and use your information.
- The lawful bases on which we process your information.
- Who we may share your information with.
- How we store and protect your information.
- How long we retain your information.
- Your rights in relation to your personal information and how to exercise them.

This notice does not form part of your contract of employment. We may update it from time to time to reflect changes in legislation, guidance or our data processing arrangements.

2. Who is responsible for your personal information?

St Cuthbert Mayne School is the data controller for the personal information it processes about its staff, unless responsibility for a particular processing activity rests with another organisation.

As data controller, the school determines why and how personal information is processed and is responsible for ensuring that processing complies with data protection legislation.

In carrying out our responsibilities, we may work with Devon County Council and other organisations that provide employment, payroll, pensions, human resources, information technology and other services. The precise responsibilities of each organisation depend on the service being provided and the relevant contractual and data protection arrangements.

Contact

You can contact the Data Protection Link Officer at the school, if you have questions about how the school uses your personal information or if you wish to raise a concern about data protection. The school outsources its Data Protection Officer service to Devon County Council.

Data Protection Link Officer	Data Protection Officer
Matt Burrell St. Cuthbert Mayne Trumlands Road Torquay Devon TQ1 4RN Email: gdpr@stcm.school	Jenny Goodall School Data Protection Team Devon County Council Topsham Road Exeter EX2 4QD Email: jenny.goodall@devon.gov.uk

3. What personal information do we collect?

The personal information we collect and hold will depend on your role, your employment arrangements and the circumstances in which we interact with you.

It may include the following categories.

Personal and contact information

- Full name, title, date of birth and gender.
- Home address and contact details.
- Preferred pronouns, where provided.
- Emergency contact details and nominated next of kin.
- National Insurance number.
- Employment and identification reference numbers.
- Details of dependants where required for employment or statutory purposes.
- Facial photograph for identification purposes, badges etc.

Recruitment and employment information

- Application forms, CVs and covering letters.
- References and information provided by previous employers.

- Qualifications, professional memberships and employment history.
- Interview notes and recruitment assessment records.
- Right to work documentation.
- Employment contracts, job descriptions and details of terms and conditions.
- Records of changes to employment, including promotions, transfers, secondments and changes in working hours.
- Probation, appraisal, performance management and capability records.
- Disciplinary, grievance and employment relations records.
- Resignation, retirement and other termination information.

Payroll, salary and financial information

- Salary, allowances and other payments.
- Bank account details for salary payments.
- Tax codes and National Insurance contributions.
- Pension contributions and related information.
- Details of deductions, including student loan repayments where applicable.
- Expenses, mileage claims and other reimbursement records.
- Information required to administer statutory payments and benefits.

Attendance, sickness and health information

- Working hours, attendance and absence records.
- Sickness absence notifications and related correspondence.
- Information about medical conditions, injuries or disabilities where necessary.
- Occupational health reports and fitness for work assessments.
- Information relating to workplace adjustments, phased returns to work and other support arrangements.
- Records relating to maternity, paternity, adoption, shared parental and other statutory leave.

Health information is treated as special category personal data and is subject to additional legal protections.

Safeguarding and suitability information

Where required for your role or by law, we may process:

- Disclosure and Barring Service (DBS) information.
- Right to work and identity verification records.
- References and safeguarding declarations.
- Information relevant to professional suitability and safeguarding responsibilities.
- Information concerning safeguarding allegations, investigations or other relevant concerns, if applicable.

Training, professional development and qualifications

- Mandatory training records.
- Safeguarding and health and safety training.

- Professional development and continuing professional development records.
- Qualifications, certificates and professional registrations.
- Appraisal objectives and development plans.
- Records of training attendance.

Equality, diversity and inclusion information

Where necessary and lawful, we may process information relating to:

- Disability and reasonable adjustments, where applicable.
- Ethnic origin, where disclosed.
- Religious or philosophical beliefs, where disclosed.
- Other equality monitoring information, where disclosed.

This information may be used to meet our legal obligations, support staff appropriately, monitor equality and diversity, and fulfil relevant reporting requirements.

Photographs, video and communications

We may use photographs, video recordings and other images of staff for legitimate school purposes, including:

- Staff identification and internal school administration.
- School displays and newsletters.
- Publications, adverts and other publicity.
- The school website and official social media channels.
- Promoting school activities and celebrating achievements.
- Safeguarding and security, where applicable.

Where required, we will seek permission or consent for particular uses of photographs or recordings. The appropriate approach depends on the purpose, the legal basis for processing and the circumstances.

We will explain where an image may be used publicly and respect relevant restrictions and objections.

Information relating to school operations and security

Depending on your role and the circumstances, we may also process:

- Work email correspondence and other business communications.
- Records of access to school systems and information technology services.
- Security access records and CCTV footage where applicable.
- Biometric information, for school meal purchases, where applicable.
- Records relating to the use of school equipment, devices and systems.
- Information relating to health and safety incidents, accidents and workplace investigations.
- Information required for business continuity, emergency management and the protection of school property.

Any monitoring of staff must be undertaken lawfully, fairly and proportionately, with appropriate transparency.

4. Where do we obtain your personal information?

We collect personal information from a variety of sources, including:

- Directly from you, including information supplied during recruitment, induction and employment.
- Your application form, references and supporting documentation.
- Previous employers and referees.
- The Disclosure and Barring Service and other relevant checking organisations, where appropriate.
- Professional bodies and qualification providers, where necessary.
- Occupational health providers and medical professionals, where appropriate and lawful.
- Torbay Council and other organisations providing employment, payroll, pension or human resources services.
- Government departments and public authorities, including HM Revenue and Customs, where required.
- Pension administrators and other relevant benefit providers.
- School management systems, access control systems and other school systems.
- Information generated through your employment, including training, appraisal, attendance and performance records.

Where we obtain personal information from another source, we will provide any additional privacy information required by data protection legislation.

5. Why do we use your personal information?

We process personal information to enable us to recruit, employ, support and manage our workforce and to meet our legal and operational responsibilities as a school.

Our purposes include the following.

Recruitment and appointment

We use personal information to:

- Assess applications and determine suitability for employment.
- Obtain and verify references and qualifications.
- Complete identity, right to work and other relevant pre employment checks.
- Complete safeguarding checks, including DBS checks where required.
- Make recruitment and appointment decisions.
- Prepare contracts of employment and establish employment records.

Employment administration

We use personal information to:

- Maintain accurate personnel records.
- Administer contracts, pay, allowances and other employment benefits.
- Manage working hours, attendance, absence and leave.
- Administer payroll, taxation and pension arrangements.
- Respond to employment queries and manage changes to employment.
- Maintain appropriate staffing and workforce records.

Staff management and development

We use personal information to:

- Undertake performance management and appraisals.
- Identify training and professional development needs.
- Manage probation, capability, disciplinary and grievance procedures.
- Support professional standards and effective school leadership.
- Make decisions about progression, and other employment matters.

Health, safety and wellbeing

We use personal information to:

- Manage sickness absence and occupational health matters.
- Consider reasonable adjustments and workplace support.
- Meet our health and safety responsibilities.
- Record and investigate accidents and incidents.
- Support staff wellbeing and safe working arrangements.

Safeguarding and suitability

We use relevant personal information to:

- Protect pupils, staff and other individuals.
- Meet our safeguarding obligations.
- Assess suitability for roles involving children.
- Investigate and respond to safeguarding concerns.
- Comply with relevant legal and regulatory requirements.

Legal and regulatory responsibilities

We use personal information to:

- Meet our statutory duties as an employer and educational establishment.
- Respond to lawful requests from public authorities and regulators.
- Maintain records required by legislation.
- Manage complaints, disputes and legal claims.
- Demonstrate compliance with employment, safeguarding, financial and other legal requirements.

School management and administration

We use personal information to:

- Manage staffing levels and workforce planning.
- Administer school systems and provide access to relevant services.
- Maintain information security and investigate suspected misuse.
- Manage business continuity and emergency arrangements.
- Produce management information and statistics where appropriate.
- Monitor equality and diversity where lawful.
- Support the effective operation and improvement of the school.

We will only use personal information for purposes that are lawful and compatible with the reasons for which it was collected, unless we have a valid legal basis for further processing.

6. What is our lawful basis for processing your information?

Data protection legislation requires us to have a lawful basis for processing personal information. The appropriate basis depends on the information involved and the purpose for which it is used.

The lawful bases most likely to apply to staff information are set out below.

Legal obligation

We process personal information where necessary to comply with legal obligations, including requirements relating to:

- Employment rights and responsibilities.
- Taxation, payroll and National Insurance.
- Pensions and statutory employment records.
- Safeguarding and safer recruitment.
- Health and safety.
- Equality and discrimination.
- Statutory reporting and regulatory requirements.

Contract

We process personal information where necessary to enter into or perform your contract of employment. This includes administering your employment, paying your salary and providing contractual benefits.

Public task

Where applicable, we process personal information where necessary to perform a task carried out in the public interest or in the exercise of official authority vested in the school.

The use of this basis will depend on the particular activity and the legal function being performed.

Legitimate interests

In some circumstances, we may process personal information where necessary for our legitimate interests or those of a third party, provided that these interests are not overridden by your rights and freedoms.

Where we rely on legitimate interests, we will consider whether the processing is necessary and proportionate and whether your interests or fundamental rights require greater protection.

Vital interests

In limited circumstances, we may process personal information where necessary to protect your vital interests or those of another person, particularly in an emergency involving a risk to life or serious harm.

Consent

In certain circumstances, we may ask for your consent to use personal information for a specific purpose.

Where we rely on consent, it must be freely given, specific, informed and capable of being withdrawn. We will not rely on consent where it is not an appropriate lawful basis, including where you do not have a genuine choice.

Withdrawing consent will not affect the lawfulness of processing carried out before withdrawal. We may also continue to process information where another lawful basis applies.

Special category personal information

Some information, including health information, ethnic origin, religious beliefs and certain other equality information, is classified as special category personal data.

In addition to a lawful basis under Article 6 of the UK GDPR, we must identify an applicable condition under Article 9 and, where required, the Data Protection Act 2018.

Depending on the circumstances, these may include processing necessary for employment, social protection or social security law; substantial public interest; the establishment, exercise or defence of legal claims; or the protection of vital interests.

We will only process special category information where the relevant legal requirements are met.

Criminal offence information

Where we process information about criminal convictions, offences or related safeguarding checks, we must have an appropriate lawful basis and meet the additional requirements of data protection legislation.

This may include the need to comply with legal obligations relating to safeguarding, recruitment and suitability for work in a school.

Where required, we maintain an appropriate policy document explaining how relevant special category and criminal offence information is handled and retained.

7. Who do we share your personal information with?

We only share personal information where there is a lawful and appropriate reason to do so. We will share only the information necessary for the relevant purpose and will take appropriate steps to protect it.

Depending on the circumstances, recipients may include:

- Torbay Council, Devon County Council, including relevant human resources, payroll, pensions, education and employment support services.
- HM Revenue and Customs and other government departments.
- The Teachers' Pension Scheme and other relevant pension administrators.
- The Disclosure and Barring Service and other organisations involved in recruitment and safeguarding checks.
- Occupational health providers and other healthcare professionals, where appropriate and lawful.
- The Department for Education and other relevant education bodies.
- External auditors, regulators and authorised inspection bodies.
- Legal advisers, insurers and other professional advisers.
- Schools or other employers where references or employment verification are lawfully provided or requested.
- Recruitment agencies and employment service providers, where applicable.
- Information technology providers and other organisations contracted to support school operations.
- Emergency services and other public authorities where necessary and lawful.
- Courts, tribunals and other bodies where disclosure is required or authorised by law.

We may also share information with other parties where necessary to protect individuals, investigate suspected wrongdoing, manage legal claims or meet our statutory responsibilities.

Where a third party processes personal information on our behalf, we will ensure that appropriate contractual and security arrangements are in place.

We will not routinely share your personal information with organisations for their own unrelated marketing purposes.

8. Will your information be transferred outside the United Kingdom?

Some of the systems and service providers used by the school may store or process information outside the United Kingdom or allow access to information from another country.

Where personal information is transferred outside the United Kingdom, we will ensure that the transfer complies with applicable data protection legislation. This may involve relying on UK adequacy regulations, appropriate safeguards or another lawful transfer mechanism.

Where required, we will provide further information about the relevant transfer arrangements.

9. How do we protect your personal information?

We take appropriate technical and organisational measures to protect personal information against unauthorised access, accidental loss, destruction, alteration or disclosure.

These measures include, where appropriate:

- Restricting access to personal information to authorised individuals.
- Using password protection, access controls and other security measures.
- Maintaining secure electronic and paper records.
- Providing staff with data protection and information security guidance.
- Using appropriate contractual arrangements with external service providers.
- Applying procedures for the secure sharing and disposal of information.
- Investigating suspected personal data breaches and taking appropriate action.

Staff personal information is only accessible to individuals who need it to carry out their responsibilities.

No system can be guaranteed to be completely secure. However, we take our responsibilities seriously and will respond appropriately to any suspected or confirmed personal data breach.

10. How long do we keep your personal information?

We retain personal information only for as long as necessary for the purposes for which it was collected, taking account of our legal obligations, operational requirements and any relevant limitation periods.

Different types of information are retained for different periods. For example, recruitment records, personnel files, payroll information, pension records, sickness absence records and safeguarding information may all have different retention requirements.

Our retention arrangements are informed by the school's records retention schedule and, where relevant, guidance issued by Devon County Council and other appropriate bodies.

When personal information is no longer required, we will securely destroy it or anonymise it where appropriate.

In some circumstances, we may need to retain information for longer, for example where it is required for a legal claim, an investigation or a statutory obligation.

If you require further information about the retention period applicable to a particular category of staff information, please contact the school or the Data Protection Officer.

11. What are your data protection rights?

Under data protection legislation, you have a number of rights in relation to your personal information. These rights are subject to certain conditions and exemptions.

Right to be informed

You have the right to receive clear information about how your personal information is collected and used. This privacy notice provides that information.

Right of access

You have the right to request a copy of the personal information the school holds about you. This is known as a subject access request.

Right to rectification

You have the right to ask us to correct inaccurate personal information and, where appropriate, to complete information that is incomplete.

Right to erasure

In certain circumstances, you have the right to request the deletion of your personal information. This right does not apply in every situation, particularly where the school needs to retain information to meet a legal obligation or perform a public task.

Right to restrict processing

In certain circumstances, you can ask us to restrict the use of your personal information while a concern about its accuracy or use is considered.

Right to data portability

In certain circumstances, you may have the right to receive personal information you have provided to us in a structured, commonly used and machine readable format, or to request that it is transferred to another organisation.

This right applies only to certain types of processing.

Right to object

You have the right to object to certain processing activities, including processing carried out on the basis of legitimate interests or public task. Whether we must stop processing will depend on the circumstances and the legal basis involved.

Rights relating to automated decision making

You have rights in relation to certain solely automated decisions that have legal or similarly significant effects on you, including relevant decisions involving profiling.

The extent of these rights depends on the circumstances and the applicable legal requirements.

Exercising your rights

If you wish to exercise any of your rights, or if you have questions about how your information is used, please contact the school or the Data Protection Officer using the details provided in this notice.

We may need to verify your identity before responding to a request.

We will respond within the timescales required by data protection legislation. In some circumstances, we may be unable to fulfil a request in full because an exemption applies or because we have a legal obligation to retain or process the information.

12. Is providing personal information compulsory?

Some personal information is necessary for us to recruit you, administer your employment, pay your salary, provide relevant benefits and meet our legal obligations.

Where you do not provide information that is necessary for these purposes, we may be unable to complete a particular process or fulfil an employment or legal requirement.

Where providing information is optional, we will explain this where appropriate and make clear the consequences of not providing it.

13. Will your personal information be used for automated decisions?

The school does not make decisions about staff solely through automated processing that produce legal or similarly significant effects.

If this changes, we will provide appropriate information about the processing, the reasons for it, the likely consequences and your relevant rights before introducing the arrangement, where required by law.

14. What should you do if you have a concern?

If you have concerns about how your personal information is being collected, used, stored or shared, you should contact the school or the Data Protection Officer in the first instance.

We will consider your concern and respond in accordance with our procedures.

You also have the right to complain to the Information Commissioner's Office (ICO), which is the independent regulator responsible for data protection in the United Kingdom.

Information about how to raise a concern is available on the ICO website:

<https://ico.org.uk/make-a-complaint/>

You can also find further information about your data protection rights and the responsibilities of organisations on the ICO website:

<https://ico.org.uk/>

15. Changes to this privacy notice

We may review and update this privacy notice from time to time to reflect changes in legislation, regulatory guidance, school procedures or the way we process personal information.

The latest version will be made available through the school's usual communication channels, including the school website where appropriate.

Where a significant change affects how we use your personal information, we will take appropriate steps to bring that change to your attention.

If you have any questions about this notice, please contact the school or the Data Protection Officer.