



## Privacy Notice for Staff, Volunteers and Governors

### INTRODUCTION

The purpose of this notice is to explain how and why The Mount School York collects personal information (or 'data') about our staff, volunteers and governors and how we will store and use (or 'process') that information. This includes information about current, past and prospective staff, volunteers and governors.

The information provided in this Privacy Notice is provided in accordance with the Data Protection Act 2018 (DPA 2018) and the General Data Protection Regulations (GDPR).

This Privacy Notice applies in addition to the School's other relevant terms and conditions and policies, including;

- Any contract between the School and Staff members
- Data Protection Policy
- Health and Safety Policy
- Safeguarding and Child Protection Policy
- Staff ICT Policy

All policies can be requested from the Principal's PA [principal@mountschoolyork.co.uk](mailto:principal@mountschoolyork.co.uk)

### WHO WE ARE

The Mount School York is a leading independent day and boarding school. The Mount School York welcomes pupils from age 2 to age 18. This Privacy Notice is intended to cover staff, volunteers and governors across the whole School and incorporates the Pre-School, Junior School, Senior School and College.

The School is a Data Controller for the purposes of Data Protection law<sup>1</sup> which means it determines how an individual's personal data is processed and for what purposes. This notice covers The Mount School York and the family of organisations associated with the School.

Name	Description	Registration Number
The Mount School York	The Mount School York provides education to pupils aged 2-18. The School also maintains relationships with and between alumnae under the banner Mount Old Scholars	Registered Company Number 1686186  Registered Charity Number 513646
The Mount School Estates (York) Ltd	The Mount School Estates (York) Ltd is the School's wholly-owned trading subsidiary	Registered company Number 2456402
The Mount School York Foundation	The Mount School York Foundation provides charitable support to The Mount School York.	Registered Charity Number 1171116

<sup>1</sup> The Data Protection Act 2018 and the General Data Protection Regulations (GDPR)

The Mount School Association (MSA)	MSA is run by parents for the purpose of fundraising for the School and organising social events.	n/a
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## WHAT IS PERSONAL INFORMATION?

Personal information is information or data that identifies you as an individual and relates to you. This includes (but is not limited to):

- Name and contact details
- Date of birth, birth certificate or passport
- Next of kin contact details
- Medical records
- Bank details and financial information
- DBS record
- Ethnicity, nationality and religion
- Photos, video recordings and CCTV footage
- Vehicle registration

## WHO DO WE COLLECT DATA FROM?

The Mount School York collects data from a range of sources including:

- Pupils and their parents
- Prospective pupils and their parents
- Agents
- Past pupils
- Staff and prospective Staff
- Volunteers
- Suppliers and service providers
- Visitors to the School
- Images captured from our CCTV
- Referees
- Disclosure and Barring Service

## HOW DO WE COLLECT YOUR DATA?

We will generally receive personal data directly from you. This may be via a form or simply in the ordinary course of interaction or communication (such as email or written correspondence).

In some cases, personal data may be supplied by third parties or collected from publicly available resources which may include:

- A previous employee
- A recruitment agency
- Nominated referees
- Disclosure and Barring Service
- Professional or government authorities
- Service providers to the School

Whilst most of the personal data you provide to us is mandatory, some is provided on a voluntary basis. When collecting data, we will inform you whether you are required to provide this data or if your consent is needed.

### **Providing Consent**

Where consent is required, the School will provide you with the reasons the data is being collected and how the data will be used. If we ask for your consent to use your personal information, you can take back this consent at any time.

### **WHAT TYPE OF STAFF DATA DO WE COLLECT?**

The categories of personal data that the School collects, stores and processes includes:

- Personal Information e.g. names, addresses, date of births, telephone numbers, e-mail addresses and other contact details
- Characteristics e.g. ethnicity, religion, language, nationality and country of birth
- Education and qualifications
- Driving licence and vehicle registration
- Previous employment history
- Bank details and other financial information
- Feedback and survey responses
- References given or received by the School
- Relevant medical information
- Information relating to criminal offences
- Referee contact details
- Next of Kin / Emergency Contact information
- Images and recordings such as CCTV, promotional images, events etc
- Lifestyle and social circumstances
- Social media posts
- Correspondence with and concerning staff, pupils and parents, past and present

### **WHY DO WE COLLECT AND USE YOUR PERSONAL INFORMATION?**

In order to carry out our duties to our employees, volunteers and governors, we may process a range of personal data about individuals. We are required to carry out some of this activity to fulfil our legal rights, duties or obligations including those under an employment contract with staff.

Other uses of personal data will be made in accordance with the School's **legitimate interests**, or the **legitimate interests** of another, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data.

### **Examples of how we use your personal information**

Here are some examples of the different ways in which we may use your personal information and where this personal information comes from:

- We obtain information about you from previous employers as part of our recruitment process
- We use personal information you have supplied in order to process payroll and administer support services
- We may take photographs or videos of staff at School events to use in publicity, social media and on the School website.
- We may send you information to keep you up-to-date with what is happening at the School,

- We may keep details after you leave the School.
- We may use information about you for historical research or for statistical purposes.

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

We only use your data when we have a legal basis for doing so. The legal basis for using your data will depend on what we need to do but includes:

**Contract:** for us to provide the terms we have agreed to provide you. For example, we require your name and bank details to pay you and your vehicle registration to provide free parking.

**Legal obligation:** for us to comply with the law. We may need to disclose your information to comply with a legal obligation, for example to report to HMRC.

**Vital Interests:** for us to be able to protect someone's life. For example, to prevent someone being seriously harmed.

**Public Interest:** The School considers that it is acting in the public interest when providing education.

**Legitimate interests:** Where necessary for our interests or the interest of a third party, but only after considering any effect this may have on you, and your rights and freedoms.

The School relies on **contract** and **legitimate interests** for most of the ways in which it uses your information. We expect that the following uses of processing personal information fall within our '**legitimate interests**':

- Supporting staff, volunteers and governor selection and employment and to confirm your identity.
- Monitoring and reporting on an employee's work.
- Safeguarding the welfare of our staff, volunteers and governors.
- Promoting the objects and interests of the School (including marketing and fundraising).
- Maintaining relationships with the School community (including marketing and fundraising).
- Enabling efficient administration of the School.
- Making use of photographic images and video footage of staff, volunteers and governors in School publications, publicity, on the School website and where appropriate on the School's social media channels.
- Complying with the law regarding data sharing.
- Fulfilling all legal obligations of the School.

If you object to us using your information where we are relying on our legitimate interests as explained above, please speak to the Director of Business Operations.

### **Special category personal data**

In addition, we may need to process **special category personal data** (concerning health, ethnicity, language or religion) in accordance with rights or duties imposed on us by law. These reasons may include:

- To safeguard your welfare and where necessary provide medical care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so, for example, medical services, social services, insurers, organisers of School trips.
- As part of any School or external complaints, disciplinary or investigation process that involves such data, for example health or safeguarding elements.

- For legal and regulatory purposes for example child protection, diversity monitoring and health and safety and to comply with the School's legal obligations and duties of care.

## **WHO PROCESSES YOUR INFORMATION?**

The Mount School York is the data controller of the personal information you provide to us. This means the School determines the purpose for which and the way in which any personal data is processed.

The Director of Business Operations acts as The Mount School's Data Protection lead. Their role is to oversee and monitor the School's data protection procedures and to ensure they are compliant with the DPA 2018 and GDPR.

## **SHARING PERSONAL INFORMATION**

We do not sell, rent, trade or otherwise disclose your data, except as described in this notice. Occasionally, we may need to share personal information relating to staff, volunteers and governors with third parties. All data outsourced to a third party is in accordance with our contractual or legal obligations. Examples of this include:

- We may share information with local authorities, such as the Department for Education (DfE) or The Independent School's Council (ISC).
- We may share information with HMRC, Student Loan Company and Pension providers.
- On occasion, we may need to share information with the Police.
- We may need to share information with our legal advisors for the purpose of obtaining legal advice.
- We may need to share information if there is an emergency, for example if you are hurt at School.

Sharing of information with third parties beyond our legal obligations will only be done with your consent. Where the School outsources data to a third-party processor, the same data protection standards that The Mount School York upholds are imposed on the processor.

Some of the School's processing activity is carried out on its behalf by third parties, such as service providers, web hosting services, cloud-based services and social media providers. Where possible this is subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions.

## **WHO HAS ACCESS TO YOUR DATA?**

Personal data collected by the School will usually remain within the School. It will be processed by appropriate individuals only in accordance with access protocols. Strict rules of access apply in regard to:

- Financial records held and accessed only by the Director of Business Operations, the Principal and the Finance Office.
- All other personnel files held and accessed only by the Principal and the Principal's PA.
- Medical records held and accessed only by the appropriate staff under the authorisation of the Principal, or otherwise in accordance with explicit consent.

## **HOW LONG DO WE KEEP YOUR DATA?**

Personal data relating to staff, volunteers and governors at The Mount School York is stored in line with the School's Data Protection Policy and its data retention guidelines. In accordance with the DPA 2018 and GDPR, we only store data for as long as necessary. How long we will need to keep

your personal data will depend on the purpose it was collected for and the basis in law for keeping it. Application forms for unsuccessful candidates will be held securely for six months before they are destroyed or erased. Application forms for successful applicants will be transferred to their employee files.

If you have any specific queries about the removal of your data, please contact the Director of Business Operations.

## **WHAT ARE YOUR RIGHTS?**

The GDPR gives you several rights in relation to your data and understanding the personal data the School holds. Staff, volunteers and governors have the following rights in relation to the processing of their personal data:

- **Right to be Informed** – you have the right to be told about how The Mount School York collects and uses your personal data.
- **Right of Access** – you have a right to request a copy of the personal data that The Mount School York holds.
- **Right to Rectification** – you can request that your personal data is amended if it is inaccurate or incomplete.
- **Right of Erasure** – you can request that your personal data is erased if there is no compelling reason for it to be stored or used.
- **Right to Restrict Processing** – you can request that the processing of your data is restricted.
- **Right to Object** – you have the right to object to your personal data being processed.
- **Right to Withdraw Consent** - where the processing of data is based on your consent, you have the right to withdraw this consent at any time.
- **Right to Data Portability** – you can request secure transfer of your data to another business. Any individual wishing to access or amend their personal data or wishing it to be transferred to another person or organisation, should contact the Director of Business Operations.
- **Right to Complain to the Regulator** - if you have a concern about the way The Mount School York is collecting or using your personal data, you can raise a concern with the Information Commissioner's Office (ICO). The ICO can be contacted on 0303 123 1113 or via <https://ico.org.uk/concerns/>

### **Obtaining a Copy of your Data**

If you wish to see the data we hold for you, please send your request in writing to the Director of Business Operations. The School will endeavour to respond to subject access requests as soon as is reasonably practicable and in any event within statutory time-limits.

### **Requests that Cannot be Fulfilled**

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals or information which is subject to legal or professional privilege.

### **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 notify the School of any changes to information held about them. Responsibility for changes in information relating to staff, volunteers and governors rests with the individual.

An individual has the right to request that any inaccurate or out-of-date information about them is erased or corrected (subject to certain exemptions and limitations under the DPA 2018).

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 its devices and access to School systems. All School personnel will be made aware of this policy and their duties under Data Protection law and receive relevant training.

## **SHARING YOUR THOUGHTS ONLINE**

The Mount School York uses social media platforms such as Facebook and Twitter. These platforms can be used by staff, volunteers and governors (as well as parents and pupils) to interact with the School. When doing this, your data may be visible to the service providers and their other users as well as The Mount School York. We recommend that you consider the privacy settings on your social media accounts, so you are clear how your information may be used and shared.

## **FURTHER INFORMATION AND GUIDANCE**

The Director of Business Operations is the person responsible at The Mount School York for managing how we look after personal information and deciding how it is shared. Like all organisations, we are required 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.

Please contact the Director of Business Operations if:

- You object to us using your information for marketing purposes
- You would like us to update the information we hold about you.
- You would prefer that certain information is kept confidential.

If you have a concern about the way The Mount School York is collecting or using your personal data, you can raise a concern with the Information Commissioner's Office (ICO). The ICO can be contacted on 0303 123 1113 or via <https://ico.org.uk/concerns/>