



2 . Staff Privacy notice

As an employer the Ecclesall Kids Club (EKC) must meet its contractual, statutory and administrative obligations. We are committed to ensuring that the personal data of our employees is handled in accordance with the principles set out in the ICO Guide to Data Protection.

This privacy notice tells you what to expect when the EKC collects personal information about you. It applies to all employees and ex-employees. However, the information we will process about you will vary depending on your specific role and personal circumstances.

EKC is the controller for this information unless this notice specifically states otherwise.

This notice should be read in conjunction with our other policies and procedures. When appropriate we will provide a 'just in time' notice to cover any additional processing activities not mentioned in this document.

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How do we get your information

We get information about you from the following sources:

- Directly from you.
- From referees, either external or internal.
- From DBS security clearance providers (currently Security Matrix security – Capita)
- From Occupational Health and other health providers.

- From NEST Pension administrators and other government departments, for example tax details from HMRC.
- CCTV images from our school on request.

What personal data we process and why

We process the following categories of personal data:

Information related to your employment

We use the following information to carry out the contract we have with you, provide you access to business services required for your role and manage our human resources processes. We will also use it for our regulatory purposes in our role.

- Personal contact details such as your name, address, contact telephone numbers (landline and mobile and personal email addresses).
- Your date of birth, gender and NI number.
- A copy of your passport or similar photographic identification and / or proof of address documents for DBS and Nationality checks.
- Marital status.
- Next of kin, emergency contacts and their contact information.
- Employment and education history including your qualifications, job application, employment references, right to work information and details of any criminal convictions that you declare.
- Security clearance details eg Enhanced DBS checks and your DBS number.
- Any criminal convictions that you declare to us.
- Your responses to staff surveys if this data is not anonymised.
- Any content featuring you produced for use on our website or social media such as bios and photographs.

Information related to your salary, pension and loans

We process this information for the payment of your salary, pension and other employment related benefits. We also process it for the administration of statutory and contractual leave entitlements such as holiday or maternity leave.

- Information about your job role and your employment contract including; your start and leave dates, salary any changes to your employment contract, working pattern (including any requests for flexible working).
- Details of your time spent working and any extra hours, expenses and advance salary payments.
- Details of any leave including sick leave, holidays, special leave etc.
- Pension details including membership of our NEST pension scheme.
- Your bank account details, payroll records and tax status information.
- Details relating to Maternity, Paternity, Shared Parental and Adoption leave and pay. -This includes forms applying for the relevant leave, copies of MATB1 forms/matching certificates and any other relevant documentation relating to the nature of the leave you will be taking.

Information relating to your performance and training

We may use this information to assess your performance and to deal with any employer / employee related disputes. We also use it to meet the training and development needs required for your role.

- Information relating to your performance at work eg probation reviews, supervisions notes, promotions.
- Grievance and investigations to which you may be a party or witness.
- Disciplinary records and documentation related to any investigations, hearings and warnings/penalties issued.
- Whistleblowing concerns raised by you, or to which you may be a party or witness.
- Information related to your training history and development needs.

Information relating to your health and wellbeing and other special category data

We use the following information to comply with our legal obligations and for equal opportunities monitoring. We also use it to ensure the health, safety and wellbeing of our employees.

- Health and wellbeing information either declared by you or obtained from health checks, eye examinations, occupational health referrals and reports, sick leave forms, health management questionnaires or fit notes i.e. Statement of Fitness for Work from your GP or hospital.
- Accident records if you have an accident at work.
- Details of any desk audits, access needs or reasonable adjustments.
- Information you have provided regarding Protected Characteristics as defined by the Equality Act and s.75 of the Northern Ireland Act for the purpose of equal opportunities monitoring. This includes racial or ethnic origin, religious beliefs, disability status, and gender identification and may be extended to include other protected characteristics.

Lawful basis for processing your personal data

Depending on the processing activity, we rely on the following lawful basis for processing your personal data under the GDPR:

- Article 6(1)(b) which relates to processing necessary for the performance of a contract.
- Article 6(1)(c) so we can comply with our legal obligations as your employer.
- Article 6(1)(d) in order to protect your vital interests or those of another person.
- Article 6(1)(e) for the performance of our task.
- Article 6(1) (f) for the purposes of our legitimate interest.

Special category data

Where the information we process is special category data, for example your health data, the additional bases for processing that we rely on are:

- Article 9(2)(b) which relates to carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights.
- Article 9(2)(c) to protect your vital interests or those of another person where you are incapable of giving your consent.
- Article 9(2)(f) for the establishment, exercise or defence of legal claims.

Criminal convictions and offences

We process information about staff criminal convictions and offences. The lawful basis we rely to process this data are:

- Article 6(1)(e) for the performance of our job role. In addition we rely on the processing condition at Schedule 1 part 2 paragraph 6(2) (a).
- Article 6(1)(b) for the performance of a contract. In addition we rely on the processing condition at Schedule 1 part 1 paragraph 1.

How long we keep your personal data

For information about how long we hold your personal data, see our retention schedule.

Data Sharing

In some circumstances, such as under a court order, we are legally obliged to share information. We may also share information about you with third parties including government agencies and external auditors.

For example, we may share information about you with HMRC for the purpose of collecting tax and national insurance contributions.

Do we use any data processors?

Yes - a list of our current data processors can be found at Annex A.

Your rights in relation to this processing

As an individual you have certain rights regarding our processing of your personal data, including a right to lodge a complaint Under the Data Protection Act or GDPR.

Transfers of personal data

We don't transfer staff personal data overseas but when this was necessary we would ensure that we have appropriate safeguards in place.

Further information

HR files

Mainly physical but some electronic records are held for each member of staff. Data is held securely on EKC systems and at our premises.

You can request your personnel file by emailing the Business and HR Manager via a subject access request. You will not be able to take away your physical file.

Staff surveys

The data collected from anonymous staff surveys is held on a cloud based platform eg Survey Monkey.

Most survey questions require quantitative responses, however some free text boxes are included. We would advise you not to share identifiable information about yourself in these boxes if you wish to remain anonymous. When appropriate we will also provide 'just in time' privacy information regarding specific surveys.

Whistleblowing

EKC has a Whistle Blowing policy and procedure in place to enable its current staff and ex-employees to have an avenue for raising concerns about malpractice.

If you wish to raise a concern please refer to EKC's whistleblowing Policy and procedure.

Although every effort will be taken to restrict the processing of your personal data and maintain confidentiality whether this is possible will be dependent on the nature of the concern and any resulting investigation.

Payroll and training

We will share some information about you with our back end payroll provider Voluntary Action Sheffield prior to you joining EKC and during your employment to ensure they have the necessary information to process your pay.

We will also share your email address with 3rd party training providers eg Educare with your consent to enable you to access training for your work.

You will need to share your email address with Magic Booking to enable you to access the Magic Booking portal and child register. Any activities you carry out on Magic Booking will be auditable eg, making bookings, register activity, accidents, incidents recording and any parent communications that happen through the Magic Booking System.

Occupational health

During your employment you may be referred to occupational health following a request by our HR/ Business Manager. This may result in a face-to-face consultation, a telephone appointment with an occupational healthcare professional and/or a medical report being requested from a GP or specialist. The purpose being to ensure we fulfil our duty of care to make Reasonable Adjustments or fairly inform Capability Procedures to ensure we have expert advice to ensure you are treated reasonably.

CCTV

Our school operates CCTV for security reasons. You may be filmed just as school staff are by CCTV which is owned and operated by them in the buildings where our premises are situated. EKC is not the data controller for this information and we do not normally access, process or store this data. With your consent should an allegation be made against you we may ask for your consent and Schools to view images to help us establish any information we need to investigate the case. You may request to see CCTV images of yourself from the School at any time through a subject access request.

Requests for references

If you leave, or are thinking of leaving, we may be asked by your new or prospective employers to provide a reference. For example we may be asked to confirm the dates of your employment or your job role. If you are still employed by us at the time the request for a reference is received we will discuss this with you before providing this. We provide a short standard reference proforma with facts such as your job role, dates of employment and responsibilities. You may view any reference that is written about you on request.

Annex A - Data Processors

Data processors are third parties who provide certain parts of our staff services for us. We have contracts in place with them and they cannot do

anything with your information unless we have instructed them to do so. Our current data processors are listed below.

Data processor	Purpose	Privacy Notice
Security Watchdog	Provider of Enhanced DBS checks	Matrix - Capita
Indeed	Applicant tracking system for recruitment	Indeed.com
Magic Booking	Provider of our managed IT childcare service	Magic Booking
NEST	For administering Pensions	NEST Pension Scheme
Educare	Training Provider	Educare (TES)
Voluntary Action Sheffield VAS	Back end payroll provider	VAS secure portal services

This policy was adopted by: Ecclesall Kids Club	Date 4.1.21
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