THE PERSE SCHOOL
CAMBRIDGE

PRIVACY NOTICE – STAFF (INCLUDING VOLUNTEERS AND OTHER THIRD PARTIES)

WHAT THIS NOTICE IS FOR

This Privacy Notice is intended to provide information about how the School and its subsidiary companies (together known as **the School**) will use (or "process") Personal Data about individuals including: its current, past and prospective staff, summer school staff, Sports Centre staff, governors, directors, volunteers and third parties such as catering staff, peripatetic music teachers, external facilities hirings, contractors and visitors.

This information is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used. Staff are all encouraged to read this Privacy Notice and understand the School's obligations to its entire community.

This **Privacy Notice** applies alongside any other information the School may provide about a particular use of Personal Data, for example when collecting data via an online or paper form.

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 contract between the School and a third party;
- the School's CCTV and Access Control policy;
- the School's Records Management Policy and Records Retention Schedule;
- the School's safeguarding, or health and safety policies, including how concerns or incidents are recorded;
- the School's IT policies, including online safety, acceptable use and social media and
- the School's Data Protection policy.

Anyone who works for, or acts on behalf of, the School (including staff, sports centre staff, summer school staff, volunteers, directors, governors and third parties such as catering staff, peripatetic music teachers, external facilities hirings, contractors and visitors must also be aware of and comply with this Privacy Notice, which also provides further information about how Personal Data about those individuals will be used.

RESPONSIBILITY FOR DATA PROTECTION

The School has appointed the Director of ICT as the Data Processing Manager who will deal with all day-to-day requests and enquiries concerning the School's use of Personal Data (see section on Your Rights below). The Bursar has ultimate responsibility for all Data Protection.

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to staff, the School may process a wide range of Personal Data about individuals (including current, past and prospective staff), as part of its daily operation.

Some of these activities the School will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with its staff.

The table below contains a general description of the different legal bases for processing Personal Data.

Legitimate interests

This means that the School is using your Personal Data when this is necessary for the School's (or sometimes a third party's) legitimate interests except when your interests and fundamental rights override our legitimate interests. Our "legitimate interests" include our interests in running the school in a professional, sustainable manner, in accordance with all relevant ethical, educational, charitable, legal, and regulatory duties and requirements (whether or not connected directly to data protection law). In this respect, depending on your role and status, we are likely to use your personal data for the following:

- providing educational and other services;
- safeguarding and promoting the welfare of our employees;
- keeping the school buildings safe;
- protecting the School's reputation;
- facilitating the efficient operation of the School;
- ensuring that all relevant legal obligations of the School are complied with (for example in relation to inspections).
- to carry out or cooperate with any school or external complaints, disciplinary or investigatory process;
- diversity and equal opportunities monitoring. Understanding more about our workforce and those who apply to join us will help the School to be more inclusive and will allow us to better support our workforce;
- monitor (as appropriate) use of the School's IT and communications platforms in accordance with the School's IT Acceptable Use Policy and government guidance such as KCSIE.

In addition, your Personal Data may be processed for the legitimate interests of others. For example, another school will have a legitimate interest in knowing if you are a suitable candidate for another role.

Necessary for contract

We process your personal data because it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, such as a contract of employment or other engagement with us. In this respect, depending on your role and status, we are likely to use your personal data for the following purposes:

- administering job applications and, where relevant, offering you a role with us;
- carrying out due diligence checks on you, whether during the application process for a role with us or during your engagement with us, including by checking references in relation to your education and your employment history and obtaining any required self-declarations;

- once you are employed or engaged by us in any capacity, for the performance of the contract of employment (or other agreement) between you and us;
- to pay you and to administer benefits (including pensions) in connection with your employment or other engagement with us;
- monitoring your attendance and your performance in your work, including in performance appraisals;
- monitoring your use of our IT systems to ensure compliance with our policies (including the School's IT Acceptable Use Policy);
- to assess and make decisions about your fitness to work, training and development requirements;
- to promote the School to prospective parents and others, including by publishing the work product(s) you create while employed by or otherwise engaged to work for the School;
- for disciplinary purposes, including conducting investigations where required;
- for other administrative purposes, for example to update you about changes to your terms and conditions of employment or engagement, or changes to your pension arrangements;
- for internal record-keeping, including the management of any staff feedback or complaints and incident reporting; and
- for any other reason or purpose set out in your employment or other contract with us.

Legal obligation

Where the School needs to use your Personal Data in order to comply with a legal obligation, for example to report a concern to Children's Services or to check your entitlement to work in the UK, to deduct tax, to comply with health and safety laws, or to enable you to take periods of leave to which you are entitled. We may also have to disclose your Personal Data to third parties such as the courts, the local authority or the police where legally obliged to do so.

Vital interests

In limited circumstances we may use your Personal Data to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

Performance of a task carried out in the public interest (or carrying out public tasks)

The following are examples of when we use your Personal Data to perform tasks in the public interest:

- safeguarding and promoting your welfare, and the welfare of others;
- facilitating the efficient operation of the School; and
- ensuring that we comply with all of our legal obligations.

Consent

Where the School is relying on consent as a means to process Personal Data, any person may withdraw this consent at any time (subject to similar age considerations as above). Please be aware however that the School may have another lawful reason to process the Personal Data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or

because a purchase of goods, services or membership of an organisation such as an alumni or parents' association has been requested).

The School must also comply with an additional condition where it processes special categories of Personal Data. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation.

The additional conditions for processing special categories of your Personal Data are:

Substantial public interest

The School is also allowed to use special categories of Personal Data were doing so is necessary in the substantial public interest. This is similar to "public interest" above.

Social protection and social security laws

Also, the School may use your Personal Data to comply with social protection law and social security laws. Social protection law is concerned with preventing, managing, and overcoming situations that adversely affect people's wellbeing.

Vital interests

In limited circumstances we may use your Personal Data to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

Legal claims

We are allowed to use your Personal Data if this is necessary in relation to legal claims. For example, this allows us to share information with our legal advisors and insurers.

In particular, we process the following types of special category personal data for the following reasons:

- your physical or mental health or condition(s) in order to record sick leave and take decisions about your fitness for work, or (in emergencies) act on any medical needs you may have;
- recording your racial or ethnic origin and sexual orientation in order to monitor our compliance with equal opportunities legislation;
- recording your trade union membership, in connection with your rights as an employee, agent or contractor and our obligations as an employer or engager of your services;
- to investigate complaints made by you or others, for example concerning discrimination, bullying or harassment, or as part of a complaint made against the School;
- data about any criminal convictions or offences committed by you, for example when conducting criminal background checks with the DBS, or via a self-declaration, or where a matter of public record (online or by any media), or where it is necessary to record or report an allegation (including to police or other authorities, with or without reference to you);

We will process special categories of personal data for lawful reasons only, including because:

- you have given us your explicit consent to do so, but only in circumstances where seeking consent is appropriate;
- it is necessary to protect your or another person's vital interests, for example, where you have a life-threatening accident or illness in the workplace, and we have to process your personal data in order to ensure you receive appropriate medical attention;

- it is necessary for the purposes of carrying out legal obligations and exercising legal rights (both yours and ours) in connection with your employment or engagement by us;
- it is necessary in connection with some function in the substantial public interest, including:
    - the safeguarding of children or vulnerable people; or
    - to prevent or detect unlawful acts; or
    - as part of a function designed to protect the public, pupils or parents from seriously improper conduct, malpractice, incompetence or unfitness in a role, or failures in services by the School (or to establish the truth of any such allegations); or
    - or to cooperate with a relevant authority, professional or regulatory body (such as the ISI, DfE, LADO or TRA) in such matters
- it is necessary for the establishment, exercise or defence of legal claims, such as where any person has brought a claim or serious complaint against us or you.

The School expects that the following uses may fall within one or more of the categories listed in the tables above.

- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as diversity or gender pay gap analysis and taxation records) (**legal basis:** legitimate interests);
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate (**legal basis:** legitimate interests, necessary for contract and legal obligation);
- Information about job performance, fitness to work, staff disciplinary matters (**legal basis**: legitimate interests, necessary for contract and legal obligation);
- Information may be shared with outside agencies such as the National College for Teaching and Leadership and the Health and Safety Executive (**legal basis:** legitimate interests, necessary for contract and legal obligation);
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's Acceptable Use of IT Policy for Staff (**legal basis:** legitimate interests, legal obligation);
- For security and safety purposes, including CCTV in accordance with the School's CCTV and Access Control Policy (**legal basis:** legitimate interests);
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School (**legal basis:** legitimate interests and legal obligation).

Special Category Personal Data Examples:

- In connection with employment of its staff, for example DBS checks, welfare or pension plans (**legal basis:** legitimate interests, necessary for contract and legal obligation. **Additional conditions:** Reasons of substantial public interest);

- Information may be obtained from occupation health practitioners (**legal basis:** legitimate interests, necessary for contract and legal obligation. **Additional conditions:** Reasons of substantial public interest); and
- For legal and regulatory purposes (for example, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care (**legal basis:** legitimate interests, necessary for contract and legal obligation. **Additional conditions:** Legal claims).

MORE THAN ONE BASIS

- In some cases, we rely on more than one basis for a particular use of Personal Data. For example, the School will rely on contract, legitimate interests and public interest bases when using Personal Data to provide children with an education. The basis that we will rely on for a particular purpose may vary depending on the circumstances.

HOW THE SCHOOL COLLECTS DATA

Generally, the School receives Personal Data from the individual directly. This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However, in some cases Personal Data may be supplied by third parties (for example another school, or other professionals or authorities working with that individual); or collected from publicly available resources.

WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH

Occasionally, the School will need to share Personal Data relating to its community with third parties, such as professional advisers (lawyers and accountants) or relevant authorities (HMRC, police, health services or the local authority).

For the most part, Personal Data collected by the School will remain within the School and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Where third parties are engaged, they will be required to confirm their compliance with Data Protection Law. Particularly strict rules of access apply in the context of:

- medical records held and accessed only by the school nurses and appropriate medical staff, or otherwise in accordance with express consent.

Staff are reminded that the School is under duties imposed by law and statutory guidance (including *Keeping Children Safe in Education*) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This may include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the Local Authority Designated Officer or police. For further information about this, please view the School's Safeguarding Policy.

Finally, in accordance with Data Protection Law, some of the School's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual obligations that Personal Data will be kept securely and only in accordance with the School's specific directions.

HOW LONG WE KEEP PERSONAL DATA

The School will retain Personal Data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. The retention of data is outlined in the Records Retention Schedule. If you have any specific queries about how this schedule is applied or wish to request that Personal Data that you no longer believe to be relevant be considered for erasure, please contact the Data Processing Manager. However, please bear in mind that the School may have lawful and necessary reasons to hold on to some data.

YOUR RIGHTS

Individuals have various rights under Data Protection Law to access and understand Personal Data about them held by the School, and in some cases ask for it to be erased or amended or for the School to stop processing it, but subject to certain exemptions and limitations.

Any individual wishing to access, erase, restrict processing, obtain, object or amend their Personal Data, should put their request in writing to the Data Processing Manager.

The School will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits, which is one month in the case of requests for access to Personal Data. The School will be better able to respond quickly to smaller, targeted requests for Personal Data. If the request is manifestly excessive or similar to previous requests, the School may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it.

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 professional privilege. The School is also not required to disclose any examination scripts, nor any confidential reference given by the School for the purposes of the education, training or employment of any individual.

SENDING PERSONAL DATA TO OTHER COUNTRIES

When the School sends Personal Data outside of the UK, we have to consider if the other country has the same level of protection for Personal Data as there is in the UK. Some countries are considered by the UK Government to have adequate rules, and this includes all of the European Economic Area and some other countries, such as, New Zealand, Argentina and Japan.

In certain circumstances, we may send your information to countries which do not have the same level of protection for Personal Data as there is in the UK. For example, we may store your information on cloud computer storage based in the USA.

We will provide you with details about where we are sending your Personal Data, whether the country has an adequacy decision and if not the safeguards which we have in place outside of this Privacy Notice.

If you have any questions about the safeguards that are in place, please contact the Data Processing Manager.

WHAT DECISIONS CAN YOU MAKE ABOUT YOUR INFORMATION?

Data protection legislation gives you a number of rights regarding your Personal Data. Your rights are as follows:

- **Rectification**: if Personal Data is incorrect, you can ask us to correct it.

- **Access**: you can also ask what Personal Data we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this data about you, where it came from and what types of people we have sent it to.
- **Deletion**: you can ask us to delete the Personal Data that we hold about you in certain circumstances. For example, where we no longer need the data.
- **Portability**: you can request the transfer of your Personal Data to you or to a third party in a format that can be read by computer. This applies where (a) the data has been provided by you; (b) the basis that we are relying on to process your data is consent or contract (please see "Our legal bases for using your data below"); and (c) the data is being processed by us on computer.
- **Restriction**: our use of Personal Data about you may be restricted in some cases. For example, if you tell us that the data is inaccurate, we can only use it for limited purposes while we check its accuracy.
- **Object**: you may object to us using your Personal Data where:
    a. the legal basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest. Please see the section "Why the School needs to process Personal Data" above; and

we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of you at a School event for historical reasons.

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 Human Resources (staff) or their main point of contact if not a current member of staff 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 Personal Data 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 concerning the use of technology and devices, and access to school systems. All staff and governors will be made aware of this Privacy Notice and their duties under Data Protection Law and receive relevant training.

THIS PRIVACY NOTICE

The School will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

QUERIES AND COMPLAINTS

Any comments or queries on this Privacy Notice should be directed to the Data Processing Manger using the following contact details The Data Processing Manager, The Perse School, Hills Road, Cambridge, CB2 8QF.

If an individual believes that the School has not complied with this Privacy Notice or acted otherwise than in accordance with Data Protection Law, they should utilise the School's Complaints Procedure and should also notify the Data Processing Manager. The individual can also lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the School before involving the Regulator.

January 2026