

PRIVACY NOTICE-STAFF

WHO WE ARE

We, The Seckford Foundation (the Foundation), are a data controller for the purposes of the Data Protection Act. The Foundation has appointed Mr G Watson as a Data Protection Officer who will deal with all your requests and enquiries concerning the Foundation's use of your personal data and endeavour to ensure that all data is processed in compliance with this Policy and Data Protection Law.

WHAT THIS POLICY IS FOR

This policy is intended to provide information about how the Foundation will use (or "process") personal data about its staff; 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 Foundation's obligations to its entire community.

This **Privacy Notice** applies alongside any other information the Foundation 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 Foundation's other relevant terms and conditions and policies, including:

- any contract between the Foundation and its staff;
- the Foundation's policy on taking, storing and using images of children;
- the Foundation's CCTV and/or biometrics policy;
- the Foundation's retention of records policy;
- the Foundation's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the Foundation's IT policies, including its Acceptable Use policy, eSafety policy, WiFi policy, Remote Working policy and Bring Your Own Device policy.

Anyone who works for, or acts on behalf of, the Foundation (including staff, volunteers, Trustees and service providers) should also be aware of and comply with this Privacy Notice the Foundation's data protection policy for staff, which also provides further information about how personal data about those individuals will be used.

WHY THE FOUNDATION NEEDS TO PROCESS PERSONAL DATA

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

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

Other uses of personal data will be made in accordance with the Foundation'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.

The Foundation expects that the following uses may fall within that category of it's (or its community's) "**legitimate interests**":

- Maintaining relationships with alumni and the Foundation community, including direct marketing or fundraising activity;

- 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);
- To enable relevant authorities to monitor the Foundation's performance and to intervene or assist with incidents as appropriate;
- To monitor (as appropriate) use of the Foundation's IT and communications systems in accordance with the Foundation's IT: acceptable use policy;
- For security purposes, including CCTV in accordance with the Foundation's CCTV policy; and
- Where otherwise reasonably necessary for the Foundation's purposes, including to obtain appropriate professional advice and insurance for the Foundation.

In addition, the Foundation may need to process **special category personal data** (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons may include:

- To safeguard staff welfare and provide appropriate pastoral (and where necessary, 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 for medical advice, or insurance purposes.
- In connection with employment of its staff, for example DBS checks, welfare or pension plans;
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

TYPES OF PERSONAL DATA PROCESSED BY THE FOUNDATION

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- bank details and other financial information,
- images of staff (and occasionally other individuals) engaging in Foundation activities, and images captured by the Foundation's CCTV system (in accordance with the Foundation's policy)

HOW THE FOUNDATION COLLECTS DATA

Generally, the Foundation 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 Charity, or other professionals or authorities working with that individual); or collected from publicly available resources

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

Occasionally, the Foundation will need to share personal information relating to its community with third parties, such as professional advisers (lawyers and accountants) or relevant authorities (HMRC, police or the local authority). For the most part, personal data collected by the Foundation will remain within the Foundation, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records held and accessed only by the Foundation doctor and appropriate medical staff under his/her supervision, or otherwise in accordance with express consent; and
- pastoral or safeguarding files.

Staff are reminded that the Foundation 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 LADO or police. For further information about this, please view the Foundation's Safeguarding Policy.

Finally, in accordance with Data Protection Law, some of the Foundation'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 assurances that personal data will be kept securely and only in accordance with the Foundation's specific directions.

HOW LONG WE KEEP PERSONAL DATA

The Foundation will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary staff personnel files is up to 7 years following departure from the Foundation. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. If you have any specific queries about how this policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact [name and contact details of relevant person handling such requests at Foundation]. However, please bear in mind that the Foundation 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 Foundation, and in some cases ask for it to be erased or amended or for the Foundation to stop processing it, but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the Bursar, Mr G Watson.

The Foundation 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 information. The Foundation will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, the Foundation 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 Foundation is also not required to disclose any confidential reference given by the Foundation for the purposes of the education, training or employment of any individual.

CONSENT

Where the Foundation is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Please be aware however that the Foundation 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).

WHOSE RIGHTS

The rights under Data Protection Law belong to the individual to whom the data relates.

Staff are required to respect the personal data and privacy of others, and to comply with the Foundation's policies, e.g. IT: acceptable use policy and the Foundation rules.

DATA ACCURACY AND SECURITY

The Foundation 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 HR department 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 Foundation may need to process your data, of who you may contact if you disagree.

The Foundation 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 Foundation systems. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

THIS POLICY

The Foundation 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 policy should be directed to the Data Protection Officer using the following contact details:

Mr G Watson
Director of SFFTS
Marryott House
Woodbridge

Tel: 01394 615000

If an individual believes that the Foundation has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the Foundation complaints / grievance procedure and should also notify the Data protection Officer. The Foundation 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 the Foundation before involving the regulator.