



Privacy Notice : Staff

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1. Introduction

Under General Data Protection Regulations (GDPR) we are obliged to inform you of the information we hold on you, including what we use it for, who we share it with, and for how long we keep it. This privacy notice (also known as a fair processing notice) aims to provide you with this information. If it, or any information linked to this Privacy Notice is unclear, please contact the Grow Education Partners Ltd Administration Team, or the Grow Education Partners Data Protection Officer. Contact details for our DPO are available throughout this privacy notice.

We, Grow Education Partners Ltd, at 36 Causton Street, London, SW1P 4AU, are a subsidiary company of the London Diocesan Board for Schools, who are the Data Controller for the purposes of data protection law.

Our Data Protection Officer (DPOs) is David Coy (david.coy@london.anglican.org, 07903 506531).

1.1: The categories of information that we collect, hold and share include (but are not limited to)

- personal information (such as name, address, national insurance number).
- contact details and preference (contact telephone numbers, email addresses, addresses)
- characteristics (such as ethnicity, religion, language, nationality, country of birth)
- the terms and conditions of your employment;
- recruitment information
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with our organisation;
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- details of your bank account and national insurance number;
- information about your marital status, next of kin, dependants and emergency contacts;
- information about your entitlement to work in the UK;
- information about your criminal record;
- details of your schedule (days of work and working hours) and attendance at work;
- details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave;
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence;
- information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments and fulfil its duty of care (including the use of Occupational Health Services);
- details of trade union membership where provided by yourself or your trade union;

- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief, where this has been provided.
- photographs (for internal safeguarding & security purposes, school newsletters, media and promotional purposes).

We may also hold personal data about you from third parties, such as references supplied by former employers or service users, information provided during the completion of our pre-deployment checks, and from the Disclosure & Barring Service, in order to comply with our legal obligations and statutory guidance.

1.2: Why we collect and use this information

The purpose of collecting and processing this data is to help us recruit staff and run Grow Education Partners efficiently, including to:

- enable you to be paid and other benefits be provided
- facilitate our safer recruitment of staff, as part of our safeguarding obligations towards the Schools with which we work
- fulfil our legal obligations in recruiting staff
- support effective performance management and appraisal
- support effective management of the Grow workforce, along with the implementation of its policies and procedures
- inform our recruitment and retention policies
- allow better financial modelling, administration and planning
- provide references where requested
- equalities monitoring and reporting
- respond to any staffing issues
- improve the management of workforce data across the organisation
- to deliver services to Schools and assess the quality of those services
- to comply with the law regarding data sharing

1.3: The lawful basis on which we use this information

Our lawful basis for collecting and processing staff information is defined under Article 6, and the following sub-paragraphs in the GDPR apply:

- (a) Data subject gives consent for one or more specific purposes.
- (c) Processing is necessary to comply with the legal obligations of the controller.
- (d) Processing is necessary to protect the vital interests of the data subject.

Our lawful basis for collecting and processing your information is also further defined under Article 9, in that some of the information we process is deemed to be sensitive, or special, information and the following sub-paragraphs in the GDPR apply:

- (a) The data subject has given explicit consent.
- (b) It is necessary to fulfil the obligations of controller or of data subject.
- (c) It is necessary to protect the vital interests of the data subject.
- (d) Processing is carried out by a foundation or not-for-profit organisation (includes religious, political or philosophical organisations and trade unions)
- (h) Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment

A full breakdown of the information we collect on our staff can be found in our 'Record of Processing'.

Where we have obtained consent to use your personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn. Some of the reasons listed above for collecting and using your personal data overlap, and there may be several grounds which justify our use of this data.

1.4: Collecting your information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain your information to us or if you have a choice in this. Where we have obtained consent to use your personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

1.5: Storing your data

We create and maintain a filing system related to each staff member. The information contained in these files is kept secure and is only used for purposes directly relevant to your employment with us. Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our retention policy.

Please refer to our Document Retention Policy for further information.

We have data protection policies and procedures in place, including strong organisational and technical measures, which are regularly reviewed. Further information can be found on our website.

1.6: Who we share information with

We routinely share staff information with appropriate third parties, including:

- your family and representatives – such as in the event of an emergency
- suppliers and service providers – to enable them to provide the service we have contracted them for eg, HR, payroll, employee benefit schemes
- financial organisations eg Pension Scheme

- our auditors, to ensure our compliance with our legal obligations
- health authorities and Occupational Health and employee support schemes – to ensure the wellbeing of our staff body in accordance with our responsibilities as employer
- security organisations – to create a secure workplace for staff
- health and social welfare organisations – to ensure the wellbeing of our staff body in accordance with our responsibilities as employer
- professional advisers and consultants
- charities and voluntary organisations
- police forces, courts, tribunals
- employment and recruitment agencies
- future employers

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

1.7: Why we share your information

We do not share information about you with anyone without consent unless the law and our policies allow us to do so.

1.8: Data collection requirements

Grow Education Partners collects data on its staff meet its contractual obligations towards them, and to ensure it is compliant as a service provider in meeting the statutory obligation placed upon it in deploying staff to provide services both to and in Schools.

1.9: Requesting access to your personal data and your data protection rights

Under data protection legislation, you have the right to request access to information about you that we hold, through a Subject Access Request. If you make a subject access request, and if we do hold information about you, we will:

- give you a description of it
- tell you why we are holding and processing it, and how long we will keep it for
- explain where we got it from, if not from you
- tell you who it has been, or will be, shared with
- let you know whether any automated decision-making is being applied to the data, and any consequences of this
- give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances. If you would like to make a request, please contact our Data Protection Officer (DPO), David Coy (david.coy@london.anglican.org, 07903 506531).

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

1.10: Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance. To make a complaint, please contact our Data Protection Officer (DPO), David Coy (david.coy@london.anglican.org, 07903 506531).

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/> or call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

1.11: Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer (DPO) is David Coy (david.coy@london.anglican.org, 07903 506531).