



ST ALOYSIUS' COLLEGE

St Aloysius' College

Privacy Statement for Staff

ICO Registration Number: Z7328006

This document provides you with information about how we are handling, or are intending to handle, your personal information.

We are committed to protecting and respecting your privacy and complying with the principles of the General Data Protection Regulations (GDPR). This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Who We Are

St Aloysius' College (The College) is a company limited by guarantee (SC405951) registered in Scotland. We are a Jesuit school and a charity registered in Scotland (SC042545). Our registered office is 45 Hill Street, Glasgow, G3 6RJ. But, for the purposes of this Privacy Policy, it's just easier if we refer to ourselves as "we" or "The College".

Collection of personal data

The College may collect and/or create or otherwise obtain data through the following processes:

- Information about you that you provide by filling in forms or contacting us (e.g. in person, through email)
- Information about you that The College generates in performing its duties (e.g. staff review, notes from a meeting, classroom observations)
- Information from third parties where you consent to those third parties sharing information they hold on you with us, and/or where those third parties lawfully share your information with us. (e.g. medical services, criminal records check (PVG), police)

Uses made of your information and the basis of processing

We will use your personal information to ensure the smooth running of St Aloysius' College. The school will therefore have what is called a "legitimate interest" for processing your personal data. The data the school holds will be the minimum it requires to fulfil this legitimate interest.

The College will not use any of the personal information we collect from you to make automated decisions.

The College expects that the following uses will fall within its "legitimate interests":

- To support the smooth running of the school (e.g. contact details, date of birth, relationships);
- To fulfil requirements as an employer (e.g. bank account, tax code)
- To monitor and support staff (e.g. staff review, lesson observations, attendance and discipline record)
- To enable relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate (e.g. regulatory authorities such as Education Scotland);
- To give and receive information and references about past, current and prospective employees;
- To safeguard staff welfare and provide appropriate pastoral care;
- To monitor use of the school's IT and communications systems in accordance with the staff IT: acceptable use policy;
- To make use of photographic images of staff in school publications, on the school website and on the school's social media channels;
- For security purposes, including CCTV in accordance with the school's CCTV policy;
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

In addition, the school will on occasion need to process **special category personal data** (religion, criminal records) in accordance with rights or duties imposed on it by law, including as regards safeguarding, or by explicit consent where required. These reasons will include:

- To safeguard pupil welfare by ensuring that staff continue to be entitled to work with children (PVG).
- To ensure appropriate staff are placed in reserved occupations (e.g. Catholic teachers of RE).
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, health and safety) and to comply with its legal obligations and duties of care.

Information security

The College will take all steps reasonably necessary including policies, procedures and security features to ensure that your data is treated securely and protected from unauthorised and unlawful access and/or use, and in accordance with this notice.

Where we have given you (or where you have chosen) a password which enables you to access certain systems, you are responsible for keeping this password confidential. We ask you not to share such a password with anyone.

Data sharing

We will share information about you with some of our suppliers who process data on our behalf to help us to provide services to you. We undertake this data sharing on the basis of our legitimate interests.

Categories of organisation and purpose

- **Online learning hosting companies** - to enable teachers to communicate with and monitor the progress of our students (e.g Schoology, Glow).
- **Financial organisations** – for the processing of salaries, pensions and benefits (e.g. HMRC, SPPA).
- **Professional Bodies** – for the maintenance of professional standards (e.g. GTCS)

International transfer of personal data

We do not generally envisage transferring your data to anyone who is located outside of the European Economic Area. One exception to this will be international trips that the school organises. When you sign up for a trip, you will be contacted for your consent, the consent will be limited in time and content if it be required.

However, on some occasions, the information we collect may be transferred to organisations who may store and use such data at premises in other countries. Where we allow an organisation to process your personal information outside of the European Economic Area, we will ensure that we create and maintain appropriate safeguards with those organisations so that your personal information is subject to the same standards and protections as when we are processing your personal information inside the European Economic Area.

Data retention period

We will hold information about you in our data systems only for as long as we need it for the purpose for which we collected it, which is as follows:

- The retention period for most staff data is for 7 years after you leave employment.
- Data relating to accidents and incidents will be retained indefinitely.
- Basic contact details will be held by the Development and Alumni Relations office indefinitely, unless you choose to opt out. A separate privacy notice will be issued for this when relevant.
- A small sample of images and other non-sensitive data will be retained indefinitely to form an historical archive of College life, unless you choose to opt out.
- A list of participants, the itinerary, accommodation details, and names of staff and volunteers who accompanied any residential trips you participated in will be retained for 50 years in case of historical insurance claim.
- Data relating to Child Protection Issues will be retained indefinitely.

These can all be modified by any other legal obligation the school finds itself under.

The data subject's rights

Under the GDPR, you have rights as an individual which you can exercise in relation to the information we hold about you.

You can read more about these rights here – <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

Changes to our privacy policy

Any changes we may make to our Privacy Notice in the future will be posted on our website and, where appropriate, notified to you by date-stamped communication.

How to contact us

If you wish to contact us about your personal data or exercise any of the rights described above please contact the Data Compliance Lead.

Telephone: 0141 332 3190

Email: data@staloysius.org

Mail: St Aloysius' College, 45 Hill Street, Glasgow G3 6RJ

Policy Owner: Data Compliance Lead, James Cluckie

Version 1 Policy Updated: May 2018

Policy Reviewed by Lawyers: May 2018

Policy Reviewed by Audit Risk and Governance Committee: May 2018

This policy will be annually reviewed by: Data Compliance Lead