

Staff Privacy Policy

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Reviewed: John Milne Sep 2020

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'College' refers to Bristol International College; 'parents' refers to parents, guardians and carers.

CONTENTS

1.	Who we are:.....	2
2.	Categories of Information	2
3.	How we use workforce information.....	2
4.	How we collect workforce information.....	2
5.	How we share workforce information with third parties	3
6.	How long we keep workforce personal information.....	4
7.	Your rights	4

1. Who we are:

- 1.1. For the purposes of Data Protection legislation, the College is the Data Controller. This means it is in charge of personal data about you. In this policy 'we' and 'us' means the College.

2. Categories of Information

- 2.1. The categories of College information that we process include:
 - 2.1.1. Personal information (such as name, Date of Birth, address, employee or teacher number, national insurance number)
 - 2.1.2. Characteristics information (such as gender, age, ethnic group)
 - 2.1.3. Contract information (such as start date, hours worked, post, roles and salary information)
 - 2.1.4. Work absence information (such as number of absences and reasons)
 - 2.1.5. Qualifications (and, where relevant, subjects taught)
 - 2.1.6. Payroll information (including bank account details)
 - 2.1.7. Sensitive information (special category personal data) Medical information, ethnic group and trade union membership if you supply it.

3. How we use workforce information

- 3.1. We process personal data relating to those we employ to work at and otherwise engage to work at, our College. This is for employment purposes to assist in the running of the College and to enable individuals to be paid.
- 3.2. Collecting and using your information in this way is lawful because
 - 3.2.1. The processing is necessary for the performance of your employment contract and in the case of special category personal data (i.e. sensitive information) processing that personal data is necessary for performing or exercising obligations or rights which are conferred on us or on you by law in connection with your employment.
 - 3.2.2. The processing is necessary for the performance of a legal obligation to which the College is subject, for example our legal duty to safeguard pupils.
 - 3.2.3. The processing is necessary to protect the vital interests of others, i.e. to protect pupils from harm.
 - 3.2.4. The processing is necessary for the performance of our education function which is a function in the public interest.

4. How we collect workforce information

- 4.1. When we collect personal information on our forms, we will make it clear whether there is a legal requirement for you to provide it, and whether there is a legal requirement on the College to collect it. If there is no legal requirement then we will explain why we need it and what the consequences are if it is not provided.
- 4.2. We also collect information from a previous employer or educational establishment. You will know about this because you will have supplied us with the relevant contact details.

5. How we share workforce information with third parties

- 5.1. We will not share information about you with third parties without your consent unless the law allows us to. We are required, by law, to pass on some of the personal data which we collect to:
 - 5.1.1. our local authority
 - 5.1.2. the Department for Education (DfE)
 - 5.1.3. HMRC
- 5.2. We disclose personal data about you to the Disclosure and Barring Service for the purposes of carrying out checks on your suitability for work with children.
- 5.3. We disclose details about you including national insurance number and absence information to our payroll provider to enable you to be paid.
- 5.4. We disclose details about you to legal HR representatives where appropriate.
- 5.5. We share your identity and pay information with HMRC in conjunction with your legal obligation to pay income tax and make national insurance contributions.
- 5.6. We share your details with our pension provider (Standard Life) in order to make sure that you pay the correct amount and maintain your entitlement to a pension upon your retirement.
- 5.7. We share your details with our holding company International Colleges Partnership. Our disclosures to third parties are lawful because one of the following reasons applies:
- 5.8. For ordinary personal data uses:
 - 5.8.1. The disclosure is necessary for the performance of your employment contract.
 - 5.8.2. The disclosure is necessary for the performance of a legal obligation to which the College is subject, for example our legal duty to safeguard pupils.
 - 5.8.3. The disclosure is necessary to protect the vital interests of others, i.e. to protect pupils from harm.
 - 5.8.4. The disclosure is necessary for the performance of our education function which is a function in the public interest.
 - 5.8.5. We collect your consent.
- 5.9. For Special Category Personal Data (i.e. Sensitive personal information) uses:
 - 5.9.1. The disclosure is necessary for the performance of a legal obligation to which the College is subject, for example our legal duty to safeguard pupils.
 - 5.9.2. The disclosure is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us as the Data Controller or on you in connection with your employment.
 - 5.9.3. Where we collect ethnic origin or disability information for equality monitoring purposes, this falls within substantial public interest and is therefore lawful (but you are not required to provide information for that purpose if you do not want to).
 - 5.9.4. We collect your explicit consent.

6. How long we keep workforce personal information

- 6.1. We only keep your information for as long as we need it or for as long as we are required by law to keep it. Full details are given in our records retention policy which is available by request from the data protection lead.

7. Your rights

- 7.1. You have the right to:
 - 7.1.1. Ask for access to your personal information
 - 7.1.2. Ask for rectification of the information we hold about you
 - 7.1.3. Ask for the erasure of information about you
 - 7.1.4. Ask for our processing of your personal information to be restricted
 - 7.1.5. Data portability
 - 7.1.6. Object to us processing your information.
- 7.2. If you want to use your rights, for example, by requesting a copy of the information which we hold about you. More information about your rights is available in our data protection policy available in the Staff Handbook
- 7.3. If at any time you are not happy with how we are processing your personal information, then you may raise the issue with the College and if you are not happy with the outcome you may raise a complaint with the Information Commissioner's Office.

Information Commissioner's Office
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Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745.