



**Privacy Notice for Staff**

**January 2024**

**Review: January 2025**

## **1 Introduction**

1.1 This privacy notice explains what personal information we collect when you work for us as an employee, agent, agency worker, or subcontractor. It also explains how we will store and use that personal information, how we keep it safe and what rights you have over it.

1.2 This policy does not form part of any personnel's contract of employment and the Reigate Learning Alliance reserves the right to change this policy at any time. All personnel are obliged to comply with this policy at all times.

## **2 Who are we?**

2.1 We are Reigate Learning Alliance (RLA). We are the controller in relation to your personal information. If you would like any information about how we handle your personal information or have any questions or concerns about the information in this notice you should contact our Data Protection Officer (DPO) at [DPO@reigate.ac.uk](mailto:DPO@reigate.ac.uk).

## **3 What information do we collect?**

3.1 The personal information that we collect, store and use includes:

- Contact details including: your full name, address, date of birth, email address, telephone numbers, teachers reference number
- Gender
- National Insurance number
- Next of kin and emergency contact details
- Details about your employment with us including: contract of employment, salary, benefits, bank account details, payslips, pensions, annual leave information
- Details from your interview including: application form, CV, interview notes (including details of your qualifications and previous experience), your references
- Your right to work and identity documents
- DBS check information
- Training, probationary, appraisal, capability, grievance and disciplinary information
- Alliance ID management systems, including your ID photograph
- Which languages you speak if you are a foreign languages teacher
- Car number plate

- Footage of you from CCTV in place at Reigate College
- Information gained from your use of IT and our telephone systems

3.2 This personal information is necessary for the Alliance to carry out our official functions and educate students, in general we use this information to:

- Administer our relationship with you
- Process selection procedures for employment
- Manage employee and employer relationships
- Enable us to fulfil our contractual obligations
- Keep you safe (including in respect of any food allergies you have, or by storing your emergency contact details)
- Meet the legal duties placed upon us by the Department for Education
- Check your safeguarding and security information
- Ensure you are qualified to take up the job role for which you have been employed
- Ensure you are supported effectively and able to fulfil your contractual obligations
- Collate information required for our single central record including vetting checks and references (references, right to work/identity documents, DBS information, name, address, date of birth, prohibition check, qualifications, List 99 check (this is a list of individuals who are barred from working with children))
- Process payments, reimburse expenses and liaise with your pension provider and Surrey Payroll Services including any necessary tax and NI deductions
- Carry out business management, work force planning, accounting, auditing and reporting including information provided to the government for Gender Pay Gap Reporting, SFCA surveys, Office for National Statistics surveys, Department for Work and Pensions surveys, Government Agency requests
- Conduct and manage reviews of performance
- Gather evidence for disciplinary, capability and grievance and make decisions about your continued employment
- Manage the end of your employment
- Educate, train and develop staff to ensure training requirements are met, for salary review purposes, disciplinary reasons and consideration of ongoing employment
- Oversee and investigate legal disputes
- Prevent fraud/criminal activity/safeguarding through CCTV monitoring
- Monitor the use of information and communication systems and ensure internal compliance; and
- Provide future employers with employment information under your right to transfer your data to another employer

3.3 This list is regularly reviewed and updated. If you would like more information, please contact our Data Protection Officer at [DPO@reigate.ac.uk](mailto:DPO@reigate.ac.uk).

#### **4 Sensitive personal information**

4.1 We may ask you to provide more sensitive personal information such as your:

- Equality information (including ethnic origin, marital status, religion, sexual orientation, disabilities and caring responsibilities) – this is optional
- Medical and administration information (such as doctors information, allergies, medication, dietary requirements, and medical conditions detailed in an Occupational Health report and sickness records)

4.2 We will only ask you for this information to the extent it is required to:

- Make reasonable adjustments for you if you have a disability
- Monitor the diversity of our staff (this ties in with our commitment to equal opportunities for all)
- Manage sickness absence, ascertain your fitness to work and contact your next of kin where necessary
- Ensure that we comply with health and safety obligations, complete accident and RIDDOR reporting

4.3 Lastly, we also collect information about any criminal convictions, cautions or bindovers.

#### **5 The legal bit – collecting, storing and using your information**

5.1 We collect your personal data for a number of purposes, set out as follows:

- Administration
- Finance
- Teaching
- Marketing
- HR
- Use of on-site CCTV

5.2 Below we set out in further detail in respect of each of the purposes set out above, why we collect it and our legal basis for doing so.

## **6 Administration**

6.1 We process your: name, address, email address, telephone numbers, date of birth, teachers reference number, ID photo, work assessment data, religion, ethnic origin, health records/conditions (including mental health), doctor's details (only where you provide us with a doctor's certificate in respect of a period of absence), any reasonable adjustments required as a result of a disability, sex-related data in connection with the running of our college office and for general administration.

6.2 Administration tasks may include: timetabling classes, communications, reports, to identify staff who cannot be used for marketing photos.

6.3 We rely on our performance of our contract with you as the lawful basis to process your personal data.

6.4 Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, e.g.:

1. We have your explicit consent
2. The processing is necessary for reasons of public interest in the area of public health
3. The processing is necessary to establish, exercise or defend legal claims

## **7 Finance**

7.1 We process your: name, address, date of birth, bank details, contract of employment, national insurance number, salary, benefits, bank account details, payslips, pensions, annual leave information in connection with our payroll administration.

7.2 We rely on our performance of our contract with you as the lawful basis to process your personal data.

7.3 Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, e.g.:

1. We have your explicit consent
2. The processing is necessary for reasons of public interest in the area of public health
3. The processing is necessary to establish, exercise or defend legal claims

## **8 HR**

- 8.1 Our Personnel Department process your: name, health records, doctor's details (only where you provide us with a doctor's certificate in respect of a period of absence), details of any allergies you have, storing your emergency contact details for the purpose of keeping you safe (including in respect of any food allergies you have, or by storing your emergency contact details), right to work and identity documents, DBS check information, training, probationary, appraisal, capability, grievance and disciplinary information.
- 8.2 We rely on our performance of our contract with you as the lawful basis to process your personal data.
- 8.3 Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, e.g.:
1. We have your explicit consent
  2. The processing is necessary for reasons of public interest in the area of public health
  3. The processing is necessary to establish, exercise or defend legal claims

## **9 CCTV**

- 9.1 We have CCTV in place at the Alliance. We collect images of you captured on CCTV footage, including your car registration plate in connection with the use of CCTV. This is in operation for the purpose of keeping you safe and maintaining adequate security at Reigate College.
- 9.2 We rely on our legitimate interests in maintaining safety at Reigate College as the lawful basis to process your personal data captured on CCTV footage. We have considered and balanced our interests in keeping the College safe against your rights as an individual and we are comfortable that the use of CCTV is proportionate in achieving the aim of ensuring adequate on-site safety.
- 9.3 The College uses CCTV systems to ensure the safety and security of all students, staff and visitors. No audio is recorded and all footage is stored for up to eight weeks until it is automatically over-written or deleted.
- 9.4 CCTV cameras are sited to ensure that only public or common areas within the College sites are recorded. The cameras are positioned so that no members of the public are inadvertently recorded.
- 9.5 Camera footage is only available to selected personnel at the College. Occasionally, camera footage may be shared with the Police to assist where a criminal activity has taken place.

## **10 Photographs**

- 10.1 We may take photographs, videos or webcam recordings of you during your time at the Alliance. These will be used for official use, monitoring and safeguarding for educational purposes. You will be made aware that this is happening and the context in which the photograph will be used. Please contact our DPO at [DPO@reigate.ac.uk](mailto:DPO@reigate.ac.uk) if you do not wish for your photograph or any footage of you to be used for marketing purposes.
- 10.2 Photographs may also be taken of you when you attend an event which may appear in the newspaper or marketing materials. You will be made aware that this is happening and the context in which the photograph will be used.

## **11 How do you collect my information?**

- 11.1 We collect your information from the application form you fill in when you apply to work for the Alliance. Whilst the majority of staff information you provide to us is mandatory, some of it requested on a voluntary basis. We will let you know whether you are required to provide certain staff information to us, or if you have a choice in this. We will also tell you what you need to do if you do not want to share optional information with us.

## **12 How we store your data**

- 12.1 Data will be stored in the Personnel Office in locked cabinets and on the Staff Database with password protection. This includes paper or electronic documents within a secure network. We take the security of personal data seriously and have internal policies and controls in place to try to ensure that personal data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

## **13 Who do you share my information with?**

- 13.1 Where the Alliance engages third parties to process personal data on its behalf, for example Barclays Bank, Surrey Payroll, Surrey Pensions and Teachers Pensions, we enter into robust written agreements with these parties, containing suitable provisions relating to data sharing between Reigate College and the third parties listed.

- 13.2 We have a legal obligation to share personal data with the Department for Education (DfE), the Education and Skills Funding Agency (ESFA), Department for Work and Pensions (DWP), Office for National Statistics and Her Majesty's Revenue and Customs (HMRC). The DfE is the data controller for personal data processed by the ESFA. We are asked to complete surveys including details of organisation structure, numbers of employees working more or less than 30 hours per week, details of pay and service, details of job vacancies, and occasionally pay details for individual employees.
- 13.3 We will share some of your personal information such as your name, address and date of birth with Strictly Education 4S (DBS Umbrella Body) and the Disclosure and Barring Service (DBS) so that they can check whether you have any previous convictions which would make you unsuitable for working with children and young people.
- 13.4 Other third parties include the S7 Consortium who we will pass your name and job title in order to allow for opportunities of staff training and networking, Medwyn Occupational Health for pre-employment clearances and occupational health reports, Irwin Mitchell Solicitors for legal advice relating to disputes, any previous employer who you have authorised us to contact in order to obtain a reference and any future employer who you have asked us to provide a reference to.
- 13.5 The Sixth Form College's Association (SFCA) require information for the purpose of surveys and benchmarking (no names are given for this purpose), Computershare to manage the childcare voucher scheme, SEE to manage the eye care voucher scheme and Cycle to Work Scheme for the purchase of bicycles under the cycle to work scheme.
- 13.6 External training organisations will be given your name for any training you have requested and your employment details will be given to any future employer who you have authorised us to provide a reference to.

## **14 Transfer of personal data**

- 14.1 We will not send your personal data outside of the UK. Our cloud based storage providers are based in the UK.



## **15 How long we keep your personal information**

15.1 We will keep your personal information for as long as you are an employee, worker or volunteer. When you leave Reigate Learning Alliance, we will retain your personnel file for a period of six years. At this point, your file will be shredded. We may also use an external company to take away records to be destroyed. However, electronic information contained on the staff database will be kept indefinitely in order to comply with reference requests from any future employer you authorise us to provide information to. We must keep selected personal data to meet any legal requirements.

## **16 What rights do I have over my personal information?**

16.1 You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), (the UK regulator for data protection issues. See [www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO and so, if you are happy to do so, please contact our Data Protection Officer at [DPO@reigate.ac.uk](mailto:DPO@reigate.ac.uk).

16.2 You also have a number of additional rights over your personal information, which are:

- The right to ask us what personal information we have about you and to have a copy of your personal information from us
- The right to ask us to correct any errors in your personal information
- The right to object to our legitimate interests, profiling activities and marketing communications
- The right to ask us to provide you with a copy of the personal information you have provided to us, in a structured, commonly used and machine-readable format and the right to transmit that personal information to another entity where: (i) we are using your personal information on the basis of your consent or on the basis that it is necessary to perform a contract with you; and (ii) the use we are making of your personal information is carried out by automated means
- The right to ask us to delete your personal information where: (i) we don't need your personal information anymore; (ii) you withdraw your consent to our use of your personal information and we have no other legal basis to keep your personal information; (iii) you have asked us to review and explain our legitimate interests to you and we don't actually have a valid legitimate interest to do what we are doing; (iv) our use of your personal information is illegal; (v) we have to delete your personal information to comply with our legal obligations
- The right to ask us to restrict the use that we are making of your personal information where: (i) you don't think the personal information we have about you is correct, so that we can check if it is correct; (ii) what we are doing with your personal information is illegal but you would rather we stop using your personal information rather than delete it; (iii) we don't need your personal information anymore, but

you need us to keep it so that you can exercise any legal rights; and (iv) you have asked us to review and explain our legitimate interests to you, so that we can check whether we actually have a valid legitimate interest to do what we are doing

- Where our use of your personal information is based on your consent, the right to withdraw your consent at any time by contacting our Data Protection Officer at [DPO@reigate.ac.uk](mailto:DPO@reigate.ac.uk)

16.3 If you want to exercise the rights set out above please contact our Data Protection Officer (see above for contact details).

## **17 How will you tell me about changes to this privacy notice?**

17.1 We keep our privacy notice under regular review. Any changes we make to our privacy notice in the future will be posted on this page and if the changes will have an effect on you or the way we use your personal information we will bring them to your attention by email where appropriate (e.g. if we have your email address as a contact at one of our customers).