



TRANSPARENCY NOTICE FOR STAFF

Policy Custodian: Deputy Head Information Systems

Approving Body: MTS Senior Leadership Team

Approved: July 2023

(This notice does not apply to Merchant Taylors' Prep.)

For the purpose of this Notice the definition of “Staff” includes employees, workers, volunteers and contractors including Visiting Music Teachers. The General Data Protection Regulation 2018 protects an individual’s rights in respect of their information. The following rights exist for individuals:

- Right to be informed how data is used by the School. (As set out below in this Transparency Notice).
- Right of access to personal data held by the School.
- Right of rectification where personal data can be rectified if it is inaccurate or incomplete.
- The “right of erasure” is to enable an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- Right to restrict processing in order to ‘block’ or suppress processing of personal data in certain circumstances e.g. where the data is inaccurate or the processing was unlawful, so that particular data is merely held but not processed.
- Right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.
- Right to object to processing based on legitimate interests, direct marketing or processing for purposes of scientific/historical research and statistics.
- Right to object to decisions made automated individual decision-making (making a decision solely by automated means without any human involvement).

Merchant Taylors' School holds and processes significant amounts of ‘personal data’ about its employees and those contracted by the School. Under the Act, the School must process such personal data ‘fairly’. The GDPR say that the information provided to data subjects about how the School processes their personal data must be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language, particularly if addressed to a child under 13 years of age;
- free of charge.

The School's Information Commissioner's Office registration number is Z1484349 and its registered address is **Merchant Taylors' School Ltd**. The School Address is Sandy Lodge Lane, Northwood, Middlesex, HA6 2AT.

Whilst **Merchant Taylors' School** is the Data Controller for the school, the School has appointed the Deputy Head Information Systems to endeavour to ensure that all personal data is processed in compliance with this policy and the Regulation. In the event if queries arise, the DHIS may be contacted at the School via email: info@mtsn.org.uk or telephone, 01923 820644 or via written communication sent to the Deputy Head Information Systems at the School postal address.

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

Data will be processed for the purposes of responding to requests for information about applying to, and joining, the School. Merchant Taylors' will therefore have a "legitimate interest" for processing basic personal data and sensitive personal data. The data the School holds will be the minimum it requires to form and maintain the contract between you and the School. Employee personal data held by the School may include, but is not limited to, the following:

- names, addresses, telephone numbers, e-mail addresses, and other contact details;
- car details (about those who use School car parking facilities);
- bank details and other financial information, e.g. information about salary, income tax, national insurance and pension payments as well as where relevant, details about fee remission for the sons of employees;
- application details, relevant qualifications held, relevant prior experience, disciplinary and grievance records and warnings, safeguarding checks, health declaration & questionnaire, sickness records, annual and family leave records, annual appraisals and other performance measures;
- details of nationality and entitlement to work in the UK, including copies of birth certificate, passport and driving license;
- details of criminal records;
- employment contracts;
- training records;
- records of health and safety incidents;
- equal opportunities monitoring information;
- where appropriate, information about individuals' health records (including details of accepted adjustments to an employee's way of working and injuries suffered by an employee during their time of employment, while engaged in School-centred activity) and contact details for their next of kin;
- references given or received by the school about employees, and information provided by previous employees and/or other professional organisations working with the individual in question;
- photographs of employees for on-site security, images of employees (and occasionally other individuals) engaging in School-centred activities, and images captured by the school's CCTV system;

We may share information about employees with third parties that manage our payroll, pension schemes, health insurance, life insurance and School credit cards. Information about an employee's tax payments is also shared with HMRC. Occasionally, the school will need to share personal information relating to its community with third parties, such as professional advisers (eg health care professionals, psychologists, counsellors, lawyers, pension fund administrators and accountants) or relevant authorities (eg police or the local authority). The School also completes reference requests from Mortgage Lenders and Property Landlords. During recruitment, we will obtain references from other employers and may give applicants details to vetting companies and the Disclosure and Barring Service. The School may also need to share personal data, including copies of passports with travel

companies of those employees who accompany boys on international trips.

Data including, full name, address, date of birth, proof of identity, signature and date of appointment of members of the Governing Body will from time to time need to be shared with organisations including the Charity Commission, Companies House, the School Auditors, as well as Banks and Investors appointed by the School.

The School also has to complete surveys issued by organisations to which it is affiliated including the Department for Education, the Independent Schools Council, the Independent Schools Bursars' Association and the Large Independent Day Schools group. Much, but not all of the information supplied to these groups is anonymous in character.

Employee personal data collected by the school will be processed by appropriate individuals only in accordance with access protocols, (i.e. on a 'need to know' basis). All Merchant Taylors' School employee personal data is held on servers physically located within the United Kingdom.

During the recruitment process, if an individual's application is unsuccessful their personal data will be retained for a period of one year. Once employees leave Merchant Taylors', the School has to retain securely all past employees personal data for seven years after the School's contract with the employee has terminated. Records that specifically relate to employee health issues or accidents that happened while the employee was employed by Merchant Taylors' School and engaged in School centred activity or business may need to be retained for a longer time period.

Everyone responsible for using the personal data of others at Merchant Taylors' School has to follow strict rules called 'data protection principles'. They must make sure the information is:

- used fairly and lawfully.
- used for limited, specifically stated purposes.
- used in a way that is adequate, relevant and not excessive.
- accurate.
- kept for no longer than is absolutely necessary.
- handled according to people's data protection rights.
- kept safe and secure.
- not transferred outside the UK without adequate protection.

Where employees have been given their data to the School under the legal basis of "consent", this consent may be withdrawn from the School in writing to the Deputy Head Information Systems without notice.

We see the provision of personal data as necessary to properly admit each employee to the School and for the School to fulfil its obligations under the contract once each employee begins their employment at the School.

There is no automated decision making or profiling involved in the Merchant Taylors' application process or during an employee's time at the School.

Employees can make subject access requests for their own personal data or subset of this data. Subject access requests must be made in writing and addressed to the Deputy Head Information Services at the School

If an individual believes that the school has not complied with this policy or acted otherwise than in accordance with the Act, they should utilise the school complaints procedure and should also notify

the Deputy Head Information Services. An individual can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Tel (01626) 545 700. However, the ICO recommends that internal steps and actions are taken to resolve the matter with the school before involving the regulator.

The school will update this Transparency Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable. Further details on personal data protection can be obtained in the School's Privacy Notice.

Deputy Head Information Systems