

**Camphill Rudolf Steiner Schools Ltd, trading as Camphill School Aberdeen (CSA)**

PRIVACY NOTICE – Employees, Co-workers, volunteers and Trustees

This notice provides information on how we process the personal data of our workforce. It applies to all workers, employees, volunteers, all co-workers and Trustees. This notice does not form part of any contract of employment or volunteer agreement and it may be amended at any time to reflect any changes required.

***How your information will be used***

As your employer or potential employer Camphill School Aberdeen (CSA) needs to keep and process information for normal employment purposes. The information we hold and process will be used for our management and administrative use only. We will keep it and use it to enable us to run the business and manage our relationship effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time your employment ends and after you have left. This includes using information to enable us to comply with the employment contract, to comply with any legal requirements, pursue any legitimate interests of the company and protect our legal position in the event of any legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

As a company pursuing care and education services including residential care, we may sometimes need to process your data to pursue our legitimate business interests, for example to prevent fraud, administrative purposes or reporting potential crimes. The nature of our legitimate interests is essentially in terms of the services we provide. We will not process your data where these interests are overridden by your own interests.

Much of the information we hold will have been provided by you, but some may come from other internal sources such as your line manager, or in some cases external sources, such as referees.

***What information we will hold***

All information held by us is to facilitate the work Camphill carries out and to meet our legal obligations.

Personal data is any information about a living individual from which they can be identified such as name, ID number, location data, any online identifier, or any factor specific to the physical, physiological, genetic, mental, economic or social identity of that person. It does not include data where any potential identifiers have been removed (anonymous data) or data held in an unstructured file.

When we refer to “processing”, this means anything from collecting, using, storing, transferring, disclosing, altering or destroying personal data.

Examples of personal data we may hold:



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- Proof of eligibility to work in the UK as required by immigration laws
- Payroll records including any student loans, child maintenance and HMRC requirements
- Any legal claims made by you or against you
- Any investigative information regarding prevention of fraud
- Disclosure, PVG and other criminal record checks where we have a legal right to do so
- DVSA checks to validate information received from you
- Pension information and all associated administration
- Formal identification information
- Contact details including personal email address which may be used to communicate with you during employment
- Bank details for salary payment purposes, sick pay and associated administration
- Details of terms and conditions of employment
- Information relating to the performance of your role at Camphill including any capability or disciplinary actions or investigations
- Information relating to any grievance process involving you and any associated investigations
- Voicemails, emails, correspondence and other work-related communications created, stored or transmitted by you using our IT systems
- Absence records including holidays, appointments, maternity, paternity and other non-medical reasons for absence
- Network and information security data to ensure we can protect your information against loss, theft or unauthorised access

### ***Examples of data where you have given specific consent to process:***

- Information disclosed to a third party regarding your salary details for either tenancy or mortgage purposes
- Information provided to a potential future employer relating to your employment for the purposes of providing a reference
- Confirmation of employment for visa purposes

### ***To pursue our (or a third party's) legitimate interests as a business.***

This may include:

- education, skills, career history, references, training records, appraisals and 1:1 meeting notes about you in order to assist/assess your career development and training needs and/or to ensure that you are properly managed and supervised;
- information relating to the performance of your employment duties, such as disciplinary records, as this is relevant to your ability to carry out your job and for us to assess and identify areas in which we may need to help you improve;



- information relating to the performance of your duties may also be used to conduct an investigation if circumstances warrant it and to take appropriate action either for conduct or capability reasons in accordance with our Disciplinary Policy/Procedure;
- information relating to any grievance process involving you, in order that an investigation may be conducted and appropriate action taken (if any) in accordance with our Grievance and Disciplinary Policies/Procedures;
- management reports (including statistical and audit information) to ensure workplace efficiencies are maximised;
- health, safety and environmental information, including records to ensure that we are complying with relevant policies and procedures. This allows us to implement any training where applicable;
- work related contact details on our intranet and/or internal systems to facilitate efficient communication within the business;
- voicemails, emails, correspondence and other work-related communications created, stored or transmitted by you using our computer or communications equipment for the purposes of the efficient management of the business.
- non-medical absence records and details including holiday records, appointments, jury service, maternity, paternity, adoption and parental leave in order to monitor attendance levels and to comply with our policies;
- CCTV/swipe card access records (where they operate) to ensure business efficiencies, for security reasons, for the protection of our property and for health and safety reasons
- network and information security data in order for us to take steps to protect your information against loss, theft or unauthorised access [in accordance with our Data Security Policy]; and
- data relating to tracking devices/technologies and activities in respect of our vehicles you drive, in order to maximise efficiencies within the business
- your name and job title on organisation charts

***Special Category information:***

We also collect, store and use your special category data for a range of reasons relying on a variety of bases for lawful processing under the GDPR.

These may include:

- Information relating to sickness absence or family related leave or special leave, to comply with employment and other legal requirements
- Information relating to you involving unlawful discrimination including investigations and actions where necessary



- Health information to assess and/or to comply with any health and safety legislation regarding our duty of care

***For occupational Health reasons or where we may have to assess your capability for working, subject to the appropriate confidentiality:***

- Information about your physical or mental health, disability status, to ensure your health and safety in the workplace and to assess your fitness for work, to provide appropriate adjustments, to monitor and manage sickness absence and to administer sick pay in accordance with our policy
- Sickness absence records, including doctors' certificates, reasons for absence and self-certification forms
- Records of return to work interviews and associated meetings to discuss absences

***To establish, defend or exercise legal claims in an employment tribunal or any other court of law.***

For example, this may include:

- terms and conditions of your employment;
- contractual rights and obligations between you and us;
- performance appraisals, training and absence records, records of grievance, disciplinary, capability and absence management processes involving you;
- personal injury or accident records.

#### ***Information about criminal convictions***

We will only collect this information if it is appropriate to your role and where the law permits us to do so. The nature of the activities that Camphill carries out require us to make background checks. This will normally be under the PVG Scheme run by Disclosure Scotland. We will normally collect this data during the recruitment process.

#### ***Data Sharing***

We may share your personal data internally. For example, employees involved in the recruitment process, employee relations, administration of your employment, line managers, consultants or advisors and/or any other appropriate person in relation to your employment.

We may share your special category data with third parties as listed below where it is necessary to administer issues of employment or where we have a legitimate interest in doing so:

- Occupational health providers
- Financial advisers including accounts and auditors
- Pension providers
- Insurance providers
- Training providers
- Recruitment agencies
- IT services
- Providers of legal services

When we disclose data to third parties, we will only disclose to them data which is necessary for them to provide their service.

We may also share your personal data and special category personal data to a regulator or to otherwise comply with legal requirements. In particular, we may share your data with the following:

- HMRC for tax purposes
- Home office for immigration purposes
- Student loan agencies if applicable
- The Care Inspectorate
- The Scottish Social Services Council
- HM Inspectors of Education
- DVSA to validate licence information
- Health & Safety Executive in respect of any health and safety matters

We are obliged to provide certain personal data to the Care Inspectorate, the Scottish Social Services Council and HM Inspectors of Education under specific legislation with these bodies. The legislation allows the Care Inspectorate to collect and process personal information about people who provide, manage and work for care services.

We are obliged to provide personal data to the Scottish Social Services Council, in exercise of its regulatory functions in relation to the social services workforce under the Regulation of Care (Scotland) Act 2001

#### ***Data storage and security***

Your personal data and special category personal data is stored in a variety of locations, including: electronically on our secure servers/in hard copy form in access-restricted, locked filing cabinets.

More information as to where specific categories of personal data are stored is set out in our Data Protection Policy.

We take appropriate technical and organisational security measures and have rules and procedures in place to guard against unauthorised access, improper use, alteration, disclosure and destruction and accidental loss of your personal data.

In addition, we limit access to your personal information to those members of our workforce who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected or actual data security breach and will notify you and the Information Commissioner's Office ("ICO") of a suspected breach where we are legally required to do so.

#### ***Data Retention***

We will keep your personal data for as long as it is necessary to fulfil the purpose it was collected for. The retention period will vary depending on the category of personal data we hold and the



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role you have fulfilled in your employment with Camphill. At its expiry or in other select circumstances, your personal data will be permanently and securely deleted.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use and retain such information without further notice to you, as it falls outside of the definition of personal data under the GDPR.

### ***Your duties***

We encourage you to ensure that the personal data that we hold about you is accurate and up to date by keeping us informed of any changes to your personal data. If you wish to update your details please contact the CSA Data Protection Officer - Mrs Kathleen Scott (Director of Finance and Corporate Services) Central Office, Murtle Estate, Bielside, Aberdeen, AB15 9EP Tel 01224 866158 email [k.scott@crss.org.uk](mailto:k.scott@crss.org.uk)

As a member of our workforce, you also have obligations under various data protection laws. Our policy on data protection is set out in our Data Protection Policy available on our website or from the CSA HR Department in Central Office. You are required to be familiar with and comply with these rules and procedures.

We encourage you to ensure that the personal data we hold about you is accurate and up to date by keeping us informed of any relevant changes. If you wish to update any details you should contact HR.

### ***Your rights***

1. Under the General Data Protection Regulations (GDPR) and the Data Protection Act 2018 (DPA) you have a number of rights regarding access to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability. There may be a small fee charged for administrative purposes.
2. If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.
3. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or the DPA with regard to your personal data.

#### ***Identity and contact details of controller and Data Protection Officer***

4. Camphill School Aberdeen is the controller (and processor) of data for the purposes of the DPA and the GDPR.
5. If you have any concerns as to how your data is processed you can contact: Kathleen Scott at Camphill School Aberdeen, email: [k.scott@crss.org.uk](mailto:k.scott@crss.org.uk)

### ***The Information Commissioners Office (ICO)***

The ICO is the UK's independent body set up to uphold information rights. If you have concerns that we cannot resolve or wish to contact them for any other reason you can phone them on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire.