

# Reaseheath College Privacy Notice for Staff

## How we use your personal information during your employment

### Introduction

Reaseheath College is committed to data security and the fair, transparent processing of personal data. This privacy notice explains how we collect, use, store, and share your personal information in accordance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, along with other applicable UK data protection laws.

This notice applies to anyone employed by Reaseheath College, including full-time, part-time, temporary, fixed-term, casual, or agency staff, and outlines:

- What personal data we collect
- How and why we process your data
- Your rights under data protection law
- Who to contact with questions or concerns

We aim to explain the purpose of any information we collect and who it may be shared with. Unless required or permitted by law, we will not use your information for unrelated purposes without your consent. As a member of staff, you also have **legal and contractual responsibilities** to protect the personal information of others, including students, colleagues, and service users.

### About Reaseheath College

Reaseheath College is one of the UK's leading specialist land-based colleges. It is a Corporation established under the Further and Higher Education Act 1992 and is recognised as an exempt charity under the Charities Act 2011. The College is inspected by Ofsted and operates from:

Reaseheath College  
Reaseheath  
Nantwich  
Cheshire  
CW5 6DF

For the purposes of data protection legislation, Reaseheath College is the data controller for the personal information it collects and processes in connection with your employment.

The College is registered with the Information Commissioner's Office (ICO) under registration number Z7450714.

Additional privacy notices are available for applicants, students, alumni, and governors on our website.

### Understanding Personal Information

'Personal information' (also known as 'personal data') means any information that relates to an identified or identifiable individual. This can include obvious details such as your name and contact information, as well as employment-specific data such as your job title, performance records, or staff ID number.

Some types of personal data are legally classified as special category personal data, which require a higher level of protection. These include information relating to:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic or biometric data (where used for identification)
- Physical or mental health
- Sexual orientation

We only collect and process special category data where it is necessary and lawful to do so — for example, to comply with employment law, support workplace adjustments, or monitor equality and diversity.

## Information We Collect and Process

We collect and process a range of personal information during the recruitment process and throughout your employment with Reaseheath College.

This may include:

### At the application and recruitment stage:

- Name and contact details (address, phone number, email)
- Employment history and qualifications
- Supporting documents (e.g. right to work evidence, application form responses)
- Referee details and interview records

### During your employment:

- Employment contract, job title, and work history at the College
- Payroll and financial records (e.g. salary, pension, expenses, benefits)
- Leave records (e.g. sickness, parental leave, holidays)
- Training and performance review data
- Records of access to systems, facilities, and services (e.g. IT, buildings)
- Photographs (e.g. for ID cards or staff directories)

Your information is stored securely in both paper and electronic formats, including HR and payroll systems. Access is limited to authorised staff with a legitimate business need, and we only retain the data necessary to fulfil our contractual, legal, or organisational responsibilities.

## Special category and sensitive data

We may also collect and process **special category personal data**, which requires additional protections under UK data protection law. This includes:

- Health or disability information (e.g. to provide support or workplace adjustments)
- Ethnicity, nationality, or religion (e.g. for equality and diversity monitoring)
- Gender identity or sexual orientation (where voluntarily disclosed)

For certain roles, we may also process sensitive information such as:

- Criminal conviction checks (e.g. DBS)
- Safeguarding clearance (e.g. where working with children or vulnerable adults)
- Fitness-to-practise declarations for regulated professions

This data is handled with a high level of confidentiality and only accessed or shared where necessary and lawful. Where applicable, you will be informed of the purpose and legal basis at the point of collection.

## Why We Use Your Information and the Legal Basis

We collect and process your personal information to support all stages of your employment at Reaseheath College, including recruitment, administration, and workforce management.

The lawful basis for processing your personal data will typically fall under one or more of the following:

- **Contractual necessity** – to manage your employment relationship (UK GDPR Article 6(1)(b))
- **Legal obligation** – to meet requirements under employment, tax, or health and safety law (Article 6(1)(c))
- **Public task** – to perform our role as a public sector education provider (Article 6(1)(e))
- **Legitimate interests** – where the processing is necessary for a reasonable organisational purpose and does not override your rights (Article 6(1)(f))
- **Consent** – for specific optional uses (Article 6(1)(a))

## We use your information for purposes including:

- Managing recruitment and right-to-work checks
- Supporting workplace adjustments and occupational health requirements
- Administering payroll, pensions, benefits, and expenses
- Conducting performance reviews, absence monitoring, and HR processes
- Providing access to facilities, IT services, accommodation, and staff events
- Managing staff records (e.g. contracts, training, qualifications, references)
- Supporting safeguarding, governance, and regulatory compliance
- Operating internal communications and distributing updates
- Producing staff directories, ID cards, and promotional content
- Complying with statutory duties (e.g. immigration, health and safety, equalities law)
- Collecting feedback and reporting anonymously for research or audit purposes
- Contacting next of kin or emergency contacts where necessary

We only collect data that is relevant and necessary for the employment relationship or our legal and organisational responsibilities.

## Special category and sensitive data

Where we collect **special category personal data** (e.g. medical information, diversity data, trade union membership), we process it under an additional lawful basis, such as:

- Employment law
- Substantial public interest (e.g. equalities monitoring or safeguarding)
- Explicit consent, where required

This data is handled with additional safeguards and will only be shared where necessary and lawful.

### **Automated decision-making**

We do **not** use your personal information to make automated decisions that have legal or similarly significant effects.

### **Who We Share Your Information With**

Your personal information will only be shared where necessary for employment purposes, legal compliance, or College operations. We always ensure that personal data is shared lawfully, confidentially, and only with authorised recipients.

#### **Internal sharing**

Your personal information may be shared internally with:

- HR and recruitment teams (including payroll and pensions)
- Your line manager and senior managers within your department
- IT services and system administrators
- Other staff or teams who require access to fulfil their job role

#### **External organisations**

We may also share your data with:

- Government departments and agencies, including the Department for Education, Home Office, HMRC, UK Visas and Immigration, and the Health and Safety Executive
- Higher and Further Education bodies and funding councils
- Pension providers and benefit scheme administrators
- Professional or statutory regulatory bodies (e.g. teaching or research regulators)
- Auditors and external consultants for review or assurance purposes
- Law enforcement agencies (e.g. the police), where legally required
- Trade unions (with your consent)
- Third-party service providers or contractors who support College operations

We will also provide references about you to third parties **where you have requested it** or given your consent.

#### **Third-party systems**

We use a secure third-party provider, **MHR**, for HR, recruitment, and payroll system management. MHR acts as a **data processor** on behalf of Reaseheath College, and we have assessed their compliance with UK data protection law.

You can view MHR's privacy notice here:

<https://mhrglobal.com/uk/en/privacy-policy>

#### **International data transfers**

Some data may be stored or accessed via cloud-based platforms with data centres located outside of the UK or EU. If this occurs, we will ensure that appropriate safeguards are in place, such as a UK **Adequacy Decision** or the use of **Standard Contractual Clauses (SCCs)** or the **UK International Data Transfer Agreement (IDTA)**.

## How Long We Keep Your Information

We retain your personal information only for as long as necessary to fulfil the purposes for which it was collected and in accordance with applicable legal and regulatory requirements.

### During your employment

Your personal information is retained as part of your staff record for the duration of your employment. It may also be used to support any future applications for employment or internal opportunities at the College.

### After your employment ends

Certain records will be retained for defined periods after your departure, depending on the type of data and relevant legal obligations (e.g. tax, pensions, or safeguarding requirements). This includes information needed for references, compliance, or audit purposes.

### Permanent records

Some information may be retained indefinitely as part of the College's historical or governance record. For example, your name may appear in Board or committee minutes, or internal reports, where your role or contributions are recorded.

For more details, please refer to the College's published retention schedule:

[Guidelines for the Retention of Personal Data \(PDF\)](#)

## Your Rights Under UK Data Protection Law

As a data subject, you have rights under the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018** regarding how we process your personal information.

Your rights include:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision-making and profiling

### Right to be informed

You have the right to be informed about how your personal data is collected and used. This privacy notice forms part of that commitment.

### Right of access

You may request a copy of the personal data we hold about you. This is known as a **Subject Access Request (SAR)**.

Requests can be made verbally or in writing. To help us process your request efficiently, please provide as much detail as possible.

Send your request to [dpo@reaseheath.ac.uk](mailto:dpo@reaseheath.ac.uk) with the subject "Data Subject Access Request".

We may ask for proof of identity. You will receive a response **within one calendar month** of verification.

### **Right to rectification**

If any personal data we hold about you is inaccurate or incomplete, you can ask us to correct or update it. Send your request to [dpo@reaseheath.ac.uk](mailto:dpo@reaseheath.ac.uk) with the subject “**Data Rectification Request**”.

### **Right to erasure**

In certain circumstances, such as where we no longer have a lawful basis for processing your data, you may request deletion.

Send your request to [dpo@reaseheath.ac.uk](mailto:dpo@reaseheath.ac.uk) with the subject “**Data Erasure Request**”.

### **Right to restrict processing**

You can ask us to suspend or restrict the use of your data — for example, while we verify its accuracy or consider an objection.

Send your request to [dpo@reaseheath.ac.uk](mailto:dpo@reaseheath.ac.uk) with the subject “**Data Restriction Request**”.

### **Right to object**

If we process your data under legitimate interest or public task, you can object if you believe your rights outweigh our justification.

Send your request to [dpo@reaseheath.ac.uk](mailto:dpo@reaseheath.ac.uk) with the subject “**Data Objection Request**”.

### **Right to data portability**

If your data was provided by you and is processed by automated means based on consent or contract, you may request it in a machine-readable format or ask us to transfer it to another organisation.

Send your request to [dpo@reaseheath.ac.uk](mailto:dpo@reaseheath.ac.uk) with the subject “**Data Portability Request**”.

### **Rights related to automated decision-making and profiling**

We do **not** use your personal data to make automated decisions that have legal or significant effects on you.

Please note: some rights may be subject to **conditions or exemptions** under UK data protection law. We will always explain these if they apply when responding to your request.

## **Social Media and Third-Party Messaging Platforms**

Reaseheath College does not endorse or permit the use of third-party communication tools — such as WhatsApp, Facebook Messenger, Instagram DMs, or other social media messaging platforms — for sharing personal or sensitive information related to College business.

As the data controller, the College cannot ensure the security, confidentiality, or legal compliance of personal data shared through these platforms. Staff must not use third-party messaging apps to share student data, staff data, or any information relating to College operations or individuals.

All employees are provided with a Microsoft 365 account, which includes secure tools such as Microsoft Teams and Outlook. These platforms should be used for internal messaging, meetings, collaboration, and file sharing.

## **Use of Photographs and Videos**

From time to time, photographs and videos may be taken on or off campus as part of College life, including during events, activities, or promotional campaigns. These images may be used in both print and digital media formats, including publications, websites, social media, poster banners, advertising, email marketing, teaching, or internal communications. This helps promote the work of the College and highlight the contributions of staff and students.

Where individuals are clearly identifiable or featured prominently, the College will seek **explicit consent** through a signed Consent Declaration. These forms are stored securely and retained only for as long as the associated images or videos are actively used.

You may withdraw your consent at any time by contacting the College. We will stop using the images from that point forward and remove them from future materials. However, **withdrawal of consent will not affect materials already published**, such as printed brochures or previously posted online content.

Please note that content shared on websites or social media platforms may be accessible globally, including in countries that do not provide the same level of data protection as the UK or EU.

For more information or to withdraw consent, contact: [marketing@reaseheath.ac.uk](mailto:marketing@reaseheath.ac.uk)

## Use of CCTV on Campus

Reaseheath College operates a CCTV system across its campuses to support a safe and secure environment for students, staff, visitors, and the wider community. The College is the **data controller** for the images captured and retains full responsibility for how this information is collected, stored, and used.

CCTV is used for the following purposes:

- Crime prevention and detection
- Campus safety and security
- Health and safety monitoring
- Investigating alleged breaches of College rules or misconduct

Cameras are positioned appropriately, and **signage is clearly displayed** to inform individuals that CCTV is in operation. The system is managed in accordance with the Data Protection Act 2018 and UK GDPR, and we aim to balance operational effectiveness with respect for individuals' privacy.

All footage recorded remains the property of the College. Access to and use of CCTV footage is restricted and governed by our internal **CCTV Policy**, which sets out how footage is stored, viewed, and shared (if necessary). Monitoring will only be undertaken by authorised personnel and for the specific purposes outlined above.

## Contacting Us About Data Protection

If you have questions about how your personal information is used, please visit the College's data protection webpages:

[www.reaseheath.ac.uk/data-protection](http://www.reaseheath.ac.uk/data-protection)

If you need further assistance, or would like to exercise your data protection rights, you can contact:

**Data Protection Team**

[data.protection@reaseheath.ac.uk](mailto:data.protection@reaseheath.ac.uk)

**Data Protection Officer (DPO)**

Graeme Lavery, Vice Principal Finance & Resources

[dpo@reaseheath.ac.uk](mailto:dpo@reaseheath.ac.uk)

Reaseheath College

Reaseheath

Nantwich

Cheshire  
CW5 6DF

## **Raising a Data Protection Concern**

If you are unhappy with how we have handled your personal information, or with the outcome of a request you have made under your data protection rights, you have the right to raise a complaint.

In the first instance, we encourage you to contact our **Data Protection Officer** at [dpo@reaseheath.ac.uk](mailto:dpo@reaseheath.ac.uk) so we can try to resolve the issue.

If you remain dissatisfied, you may lodge a complaint with the **Information Commissioner's Office (ICO):**

### **Information Commissioner's Office**

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Website: [www.ico.org.uk](http://www.ico.org.uk)

## **Updates to This Privacy Notice**

This privacy notice was last reviewed in **May 2025**. Any updates will be published on the College's website. Where changes are significant, we will also notify you directly by email or other appropriate means.