



London Diocesan Board for Schools

DBS Service Privacy Notice

For Umbrella User Organisations and Applicants

Under General Data Protection Regulations (GDPR) we are obliged to inform you of the information we hold on you, including what we use it for, who we share it with, and for how long we keep it. This privacy notice (also known as a fair processing notice) aims to provide you with this information. If, or any information linked to this Privacy Notice is unclear, please contact the LDBS Chief Executive Officer, or the LDBS Data Protection Officers. Contact details for both are available throughout this privacy notice.

We, the London Diocesan Board for Schools at 36 Causton Street, London, SW1P 4AU are the Data Processor for the purposes of data protection law.

Our Chief Executive Officer is Inigo Woolf, inigo.woolf@london.anglican.org 020 7932 1165

Our Data Protection Officer (DPO) is Claire Mehegan, Claire.mehegan@london.anglican.org

1. The categories of staff information that we collect, hold and share include but are not limited to:

- names, contact details of designated School staff who liaise with us on the service we provide to them.
- Names, date of birth, gender, place of birth, contact details, National Insurance Number, Passport Number, Driving Licence Number, current and previous 5 years address history, whether or not a criminal conviction exists, Update Service number (where applicable), DBS Certificate Number, and date of Certificate Issue for all applicants.
- We process special category data (Criminal Record Information).
- Barred List checks
- Section 128 Checks

We may also hold personal data about you from third parties, such as the Disclosure & Barring Service, in order to comply with our legal obligations and statutory guidance.

2. Why we collect and use this information

The purpose of collecting and processing this data is to help us recruit staff and run the school efficiently, including to:

- The provision of a DBS Checking Service, acting as an Umbrella Body/Registered Body with the Disclosure & Barring Service (DBS). The service is for Schools who are not registered in their own right to obtain a DBS Certificate for their staff, governors, volunteers and where required, contractors.
- We are required to adhere to the DBS Code of Practice, as outlined in Section 120, Part V of the Police Act 1997

3. The lawful basis on which we use this information

Our lawful basis for collecting and processing staff information information is defined under Article 6, and the following sub-paragraphs in the GDPR apply:

- (a) Data subject gives consent for one or more specific purposes.
- (c) Processing is necessary to comply with the legal obligations of the controller.

Our lawful basis for collecting and processing your information is also further defined under Article 9, in that some of the information we process is deemed to be sensitive, or special, information and the following sub-paragraphs in the GDPR apply:

- (a) The data subject has given explicit consent.
- (b) It is necessary to fulfill the obligations of controller or of data subject.

A full breakdown of the information we collect on DBS Applicants can be found in our 'Record of Processing'.

Where we have obtained consent to use applicants personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn. Some of the reasons listed above for collecting and using your personal data overlap, and there may be several grounds which justify our use of this data.

4. Collecting Applicant information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain your information to us or if you have a choice in this. Where we have obtained consent to use your personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

5. Storing your data

We create and maintain a file system for DBS applications. The information contained in this system is kept secure and is only used for purposes directly relevant to your DBS application. Once your certificate has been issued we will retain this file and delete the information in it in accordance with our retention policy.

Please refer to our Document Retention Policy for further information.

We have data protection policies and procedures in place, including strong organisational and technical measures, which are regularly reviewed.

6. Who we share information with

We routinely share staff information with appropriate third parties, including:

- Applicant Data with the Disclosure & Barring Service (DBS)
- Applicant Data with the School submitting the check
- Applicant Data with the Barred List Convenor (either the DBS or Teachers Pensions Online)
- Applicant Data with Due Diligence Checking Limited, where an applicant requires an external ID verification in line with DBS
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Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

7. Why we share your information

We do not share information about you with anyone without consent unless the law and our policies allow us to do so.

8. Data collection requirements:

The data is collected and processed contractual obligations we have entered into to provide a service to Schools, and the contractual controls put in place on the processing of the data provided for DBS Checks to be carried out.

9. Requesting access to your personal data and your Data Protection Rights

Under data protection legislation, staff members have the right to request access to information about them that we hold, through a Subject Access Request.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please contact our Data Protection Officer (DPO) Claire Mehegan, Claire.mehegan@london.anglican.org

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

10. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our Data Protection Officer (DPO) Claire Mehegan, Claire.mehegan@london.anglican.org

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>

- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

11. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer (DPO) Claire Mehegan, Claire.mehegan@london.anglican.org