

## **Staff Privacy Notice for Online Live & Pre-recorded Lessons**

### **Online Live & Pre-recorded lessons**

In line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA) Harbour Learning Trust is your data controller and we process your personal data in compliance with the law. The purpose of this privacy notice is to inform you how your personal data is used and protected by Harbour Learning Trust.

### **What are the Trust expectations of Staff?**

Staff members must follow the principles of the school's code of conduct. When you are required to teach lessons, or to communicate with pupils and/or parents from home, you should be reminded that professional standards in relation to dress, language, email contact, and professional boundaries must be maintained. When broadcasting or recording, staff should be mindful of what is displayed in the background. This is important to protect both pupils and staff.

Be mindful that you:

- do not share contact details when emailing multiple parents
- do not commit a data breach when sharing usernames and other personal data for access to online resources
- provide access to school data systems safely

The DfE guidance on "Safeguarding and Remote Learning During Coronavirus" states that, when communicating online with parents and pupils, schools should:

- communicate within school hours as much as possible (or hours agreed with the school to suit the needs of staff)
- communicate through the school channels approved by the senior leadership team
- use school email accounts (not personal ones)
- use school devices over personal devices wherever possible
- advise teachers not to share personal information.

### **What is the lawful basis of processing personal data in the recorded lesson and can I opt out of having my personal data recorded?**

The lawful basis for processing this personal data is "Contract". This is considered in the light of the exceptional circumstances and the changes that are required to continue to educate pupils. Where recordings are considered necessary, they are likely to be limited to the subject-matter of the lessons that they would be usually required to teach. In law, employees have a duty to obey the lawful and reasonable instructions of their employer. This is an implied term of an employment contract. What this means is that an employer can insist that an employee performs a particular duty

or instruction, provided that the instruction is reasonable in the circumstances, and is not wholly inconsistent with the terms of their employment contract.

### **How are recordings stored and shared?**

Recordings are stored within the Healing School file server. Recordings will be stored in line with GDPR data retention timescales and then deleted. If the recordings are downloadable from the Online Learning Platform pupils and parents must not download them, share them or edit them in anyway.

The School may share the recordings with the police and other law enforcement agencies, for the prevention or detection of crime.

### **Where can I get more information?**

The Harbour Learning Trust Data Protection Policy is available on the website ([www.harbourlearningtrust.com](http://www.harbourlearningtrust.com)). For further information or to make a complaint please contact the Information Commissioners Office: [icocasework@ico.org.uk](mailto:icocasework@ico.org.uk)