

Privacy notice for the school workforce

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Version Control Updates

Date of review	Reviewer	Amendment made
July 2025	Michelle Ridsdale	Section1: bullet points added on how data controller complies with data protection law and principles
July 2025	Michelle Ridsdale	Section 2: Information about the use of our information and communications systems, equipment and facilities (e.g. school laptops / iPad)
July 2025	Michelle Ridsdale	Section 3: Added bullet point relating to information and communication systems and managing sickness absence Added section 3.3 – use of personal data for filtering and monitoring purposes.
July 2025	Michelle Ridsdale	Section 4 – Processing Basis added with UK GDPR Article listed Section 4.7 – How Government uses your data – link added to external guidance
August 2026	Michelle Ridsdale	Approval updated from Karen Bramwell to Trust Board in line with other policies.

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1. Introduction

Under UK data protection law, individuals have a right to be informed about how Forward As One CE MAT uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store, and use personal data about **individuals we employ, or otherwise engage to work within the Multi-Academy Trust.**

For the Trust: Forward As One CE MAT (Newnham Street, Bolton BL1 8QA) is the 'data controller' for the purposes of UK data protection law.

We will comply with the data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept securely

Our data protection officer is Mrs. Michelle Ridsdale (see 'Contact us' below).

2. The personal data we hold

Personal data that we may collect, use, store, and share (when appropriate) about you includes, but is not restricted to:

- Your name
- Contact details.
- Date of birth, marital status, and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension, and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documents, references and other information included in a CV or cover letter or as part of the application process.
- Qualification and employment records, including work history, job titles, working hours, training records and professional memberships.
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving license – minibus driver(s)
- Information about the use of our information and communications systems, equipment and facilities (e.g. school laptops / iPad)

We may also collect, use, store, and share (when appropriate) information about your child that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Any medical/health conditions we need to be aware of, including physical and mental health.
- Sickness records
- Photographs and CCTV images captured in school
- Trade union membership

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about your child that we have received from other organisations, including other schools and social services and the Disclosure and Barring Service in respect of criminal offence data.

3. Why we use this data

We use the data listed above to:

- a) Enable you to be paid.
- b) Check your entitlement to work in the UK
- c) Determine the terms on which you work for us
- d) Facilitate safer recruitment, as part of our safeguarding obligations towards pupils
- e) Support effective performance management.
- f) Inform our recruitment and retention policies.
- g) Allow better financial modelling and planning.
- h) Enable equalities monitoring.
- i) Improve the management of workforce data across the sector.
- j) Support the work of the School Teachers' Review Body
- k) Make sure our information and communications systems, equipment and facilities (e.g.school computers, ipad) are used appropriately, legally and safely
- l) Ascertain your fitness to work
- m) Manage sickness absence

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

3.1 Use of your personal data for marketing purposes

Where you have given, us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes, or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

3.2 Use of your personal data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices to explain the processing to you, including your right to object to it.

3.3 Use of your personal data for filtering and monitoring purposes

While you're in our school, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. Safeguarding and Child protection) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)
- Protect your welfare

4. Reasons we can collect and use your personal information

We rely on having a legitimate reason as your employer to collect and use your personal information, and to comply with our statutory obligations, and to carry out tasks in the public interest. If we need to collect special category (sensitive) personal information, we rely upon reasons of substantial public interest (equality of opportunity or treatment).

Under the UK General data Protection Regulation (GDPR), the legal basis/bases we rely on for processing personal information for general purposes are:

Processing Basis 1: Processing is necessary in order to meet our duties as an employer (**Article 6, 1c UK GDPR** compliance with a legal obligation and **Article 9, 2b UK GDPR** carrying out obligations obligations and exercising specific rights in relation to employment).

Processing Basis 2: Processing necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (**Article 6, 1b UK GDPR** re contract of employment or the provision of a service to commercial client).

Processing Basis 3: The data subject has given consent to the processing of his or her personal data for one or more specific purposes (**Article 6, 1a UK GDPR** and **Article 9, 2a UK GDPR**). If you give consent, you may change your mind at any time and withdraw your consent by contacting the Trust Data Protection Officer.

We are required to share information about our workforce members under section 7 of the Education (Supply of information about the school workforce, England) Regulations 2007 and amendments.

This personal data includes identifiers such as names and National Insurance numbers and characteristics such as ethnic group, employment contracts and remuneration details, qualifications and absence information.

4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way.
- We need to perform or exercise an obligation or right in relation to employment, social security, or social protection law.
- We need to protect an individual's vital interests (i.e., protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent.
- The data concerned has already been made manifestly public by you.
- We need to process it for the establishment, exercise, or defence of legal claims.
- We need to process it for reasons of substantial public interest as defined in legislation.

- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law.
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law.
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest.

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way.
- We need to protect an individual's vital interests (i.e., protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent.
- The data concerned has already been made manifestly public by you.
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights.
- We need to process it for reasons of substantial public interest as defined in legislation.

4.2 Who we share your personal information with

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

Where it is legally required, or necessary (and it complies with UK data protection law), we may share personal information about you with:

- HM revenue and Customs
- Local Authorities in which the school sits – to meet legal obligations to share certain information with it, such as safeguarding concerns
- Pension Schemes
- Healthcare, social and welfare professionals and organisations
- The Disclosure and Barring Service
- Central Government Departments
- Educators and Examining bodies
- Professional bodies
- Law enforcement agencies and bodies
- Courts and tribunals
- Legal representatives
- Ombudsman and Regulatory bodies e.g. Ofsted
- Service providers – for e.g. HR, Filtering and monitoring, payroll
- Trade Unions
- The Trust's auditors – to meet our legal obligations of having internal and external audits.

With your explicit consent, we will share information with:

- Credit Reference Agencies.
- Mortgage providers, Housing Associations and landlords

To support TUPE arrangements the minimum necessary personal data and special categories of personal data will only be passed.

We will share personal data with law enforcement or other authorities if required by applicable law, for example, in relation to the prevention and detection of crime, counter terrorism, safeguarding, legal proceedings or to protect interests of you or another.

The Department for Education (DfE) collects and processes personal data relating to those who work in state funded schools. All state funded schools are required to make a census submission because it is a statutory return under **sections 113 and 114 of the Educational Act 2005**.

The DfE may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- Conducting research or analysis
- Producing statistics
- Providing information, advice or guidance

4.3 Collecting workforce Information

We collect personal information via applications, new starter forms, contracts, change of personal details forms and by data collection forms as and when required which would be signed by the employee.

Workforce data is essential for the Trust operational use. Whilst the majority of personal information you provide is mandatory, some of it is requested on a voluntary basis. In order to comply with UK GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this. You can withdraw your consent for the processing of your personal data at any time if that processing is on the sole basis of your consent (**Processing Basis 3**)

4.4 Storing Workforce Information

We keep personal information about you while you work at our school. We may also keep it beyond your employment at our school if this is necessary. Our [record retention schedule/records management policy] sets out how long we keep information about staff.

You can request a copy of the Record Retention Schedule from your employer.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

4.5 Who we share work force information with

We routinely share this information with the DfE. We do not share information about workforce members with anyone without consent unless the law and our policies allow us to do.

4.6 Department for Education

We are required to pass information about our school employees to the DfE under Section 7 of the Education (Supply of Information about the school Workforce) (England) Regulations 2007 and amendments. All data is transferred securely and held by the DfE under a combination of software and hardware controls which meet the current government security policy framework.

For more information refer to 'How Government uses your data' section.

4.7 How Government uses your data

The workforce data that we lawfully share with the DfE through data collections:

- Informs departmental policy on pay and the monitoring of the effectiveness and diversity of the school workforce
- Links to school funding expenditure
- Supports longer term research and monitoring of educational policy

To find out more about the data collection requirement placed on us by the DfE including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuse-for-schools>

The DfE has robust processes in place to ensure that confidentiality of personal data is maintained and there are the stringiest controls in place regarding access to it and its use. Decisions on whether the DfE release personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- Who is requesting the data
- The purpose for which it is required
- The level and sensitivity of data requested
- The arrangements in place to securely store and handle data

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

5. Your rights

5.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you. If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- 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
- 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.

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

5.2 Your other rights regarding your data

Under UK data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing.
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected.
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing.
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose.
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations.

To exercise any of these rights, please contact us (see 'Contact us' below).

6. 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.

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

- > Report a concern online at <https://ico.org.uk/make-a-complaint/>
- > Call 0303 123 1113
- > Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

7. 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**:

Michelle Ridsdale ridsdalem@fa1.uk