



Workforce Privacy Policy

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1. Policy Statement

This notice explains what personal data (information) we hold about you, how we collect it, how we use it, and how we may share it. We are required to give you this information under data protection law.

2. Definitions

Term	Definition
Trust	is Marlow Education Trust, Sir William Borlase's Grammar School, West Street, Marlow, SL7 2BR
Department of Education (DfE)	is the government department which deals with education
Local Authority (LA)	is Buckinghamshire County Council
Chair of Trustees	is Sarah Cooper
CEO	is Kevin Ford
School Headteacher	is registered on: https://get-information-schools.service.gov.uk/
Employee(s)	Is all Trust staff
Third-party Providers	is [list providers e.g. Pension, Payroll, Management Information Systems or any other workforce services]
Parents	Are either the parents, carers, or guardians
Trusts Data Protection Officer (DPO)	is Satswana Ltd, Suite G12 Ferneberga House, Alexandra Road, Farnborough, GU14 6DQ. admin@satswana.com
Data Protection Act (DPA)	The UK's primary data protection legislation. It sits alongside and supplements the UK GDPR, including UK-specific provisions, exemptions and enforcement arrangements.

Term	Definition
UK General Data Protection Regulation (GDPR)	The UK's version of the GDPR, retained in domestic law. It sets out core data protection principles, rights and obligations, and is supplemented by the DPA 2018. The EU General Data Protection Regulation (EU GDPR) applies within the European Union.
Data (Use and Access) Act 2025 (DUAA)	Amends data protection, digital verification and smart data frameworks. Key education-sector changes include the ability to pause subject access request timescales during school holidays ('stop the clock'), a statutory reasonable and proportionate test for compliance with information rights, and the renaming of the Information Commissioner's Office (ICO) to the Information Commission (IC).
Freedom of Information Act (Fol)	The Freedom of Information Act 2000 discloses information held by public authorities or persons providing services for them and amends the Data Protection Act.
Educations Act (EA)	The Education Act 1996 consolidates the Education Act 1944 and certain other educational enactments.
Information Commissioners Office (ICO)	The UK's independent regulator for data protection, freedom of information and related rights. It ensures compliance with the Data Protection Act, the Freedom of Information Act, and the UK GDPR, and handles formal complaints. (Formerly known as the Information Commissioner's Office (ICO); renamed under the Data (Use and Access) Act 2025.)
Electronic Platform	An electronic platform is any means the Trust communicates. This could include, but is not limited to, Email, Online Portals, and Social Media platforms.

3. Introduction

Under UK data protection law, individuals have a right to be informed about how our Trust 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 data.

This privacy notice explains how we collect, store and use personal data about individuals working with our Trust or trust in a voluntary capacity, including governors or trustees.

Our Trust is the 'data controller' for UK data protection law.

Our data protection officer is Satswana Ltd, also known as Trusts Data Protection Officer (DPO).

4. What Data the Trust Processes

As part of its operations, the Trust may process a wide range of personal data about individuals, including by way of example:

- Names, addresses, telephone numbers, email addresses, and other contact details.
- Car details (about those who use our car parking facilities).
- 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 documentation, references and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information
- Outcomes of any disciplinary or grievance procedures
- Absence data
- Information about trade union membership
- Where appropriate, information about individuals' health, special needs, and contact details for their next of kin.
- References given or received by the Trust and information provided by previous educational establishments or other professionals or organisations working with pupils or previous employers.
- Images of individuals engaging in Trust activities and images captured by the Trust's CCTV system
- Visitor logs, login credentials, digital access, and other logs.
- Biometric information is used to access cashless payment systems and boarding facilities.

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

We may also hold data about you that we have received from other organisations, including other Trusts and social services, as well as the Disclosure and Barring Service regarding criminal offence data.

5. How we use your personal information

We use your personal information to:

- Establish and maintain effective governance.
- Meet statutory obligations for publishing and sharing your details.
- Facilitate safe recruitment as part of our safeguarding obligations towards pupils.
- Undertake equalities monitoring.
- Ensure that appropriate access arrangements can be provided for required volunteers.
- Ensure that our information and communication systems, equipment, and facilities (e.g., Trust computers) are used appropriately, legally, and safely.
- model patterns of service involvement to support future service delivery planning.

6. How long your data will be kept

We will retain personal data only for as long as necessary for the purposes for which it was collected or as required by law. We have implemented a data retention policy which sets out the retention periods for different categories of personal data. For example:

- Employee records: retained for up to 7 years after the employee leaves the Trust.
- CCTV footage: retained for up to 1 year unless required for an investigation.

We will take reasonable steps to securely delete or anonymise personal data when it is no longer needed.

7. Reasons we can collect and use your personal information

We collect and use your personal information to carry out tasks to comply with our legal obligations and to carry out tasks in the public interest. We rely on the following legal bases under the UK GDPR:

- Article (6)(1)(c) - Legal obligation: the processing is necessary to comply with the law (not including contractual obligations).
- Article (6)(1)(e) - Public task: the processing is necessary to perform a task in the public interest or for official functions (task or function has a clear basis in law).

When we collect or share 'special category' personal data, we rely on the following legal bases under the UK GDPR:

- Article 9(2)(g) - Reasons of substantial public interest
We rely on the Equality of opportunity or treatment purpose condition from Schedule 1 of the Data Protection Act 2018 when relying on Article 9(2)(g) to process your special category data.
- Article 9(2)(h) - Health or social care (if a case needs to be stepped up to children's social work services or the management of social care systems or services)

- Article 9(2)(j) - Archiving, research and statistics (for scientific or historical research purposes or statistical purposes)
- Article 9(2)(f) - Legal claims or judicial acts (for the establishment, exercise or defence of legal claims whenever courts are acting in their judicial capacity).

a. 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 1 of the following conditions for processing as set out in UK data protection law:

- We need to perform or exercise an obligation or right concerning employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. preserve your child's 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

We will only collect and use criminal offence data when we have both a lawful basis, as set out above, and a condition for processing 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. preserve your child's 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

8. Who do we share your personal information with

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

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

- DfE (statutory for Trust funding) and other government agencies and local authorities as required (e.g. to resolve funding queries).
- LA teams are working to improve outcomes for children and young people.
- Commissioned providers of LA services (such as education services).
- Other Trusts or colleges that you may attend after leaving us.
- Local forums with Trusts and LA representatives, which support in-year fair access processes and support managed moves between Trusts.
- Local multi-agency forums that provide SEND advice, support, and guidance.
- Partner organisations signed an Information Sharing Agreement, where necessary, which may include Police, Trust nurses, doctors, mental health workers and NHS Foundation Trust.
- Third-party Providers of information services where consent has been given.
- Contracted providers of services (such as Trust photographers, filtering and monitoring, and catering providers) where consent was given.

We will share personal information with law enforcement or other authorities if required by applicable law.

a. Use of your data for marketing purposes

Where you have consented, we may send you marketing information by email or text promoting Trust events, campaigns, charitable causes or services that may interest you. You can withdraw consent or 'opt-out' of receiving these emails or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication or by contacting the Trust.

b. Use of Your Data in Automated decision-making and Profiling

We do not currently process employees' 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.

c. Use of your data for filtering and monitoring purposes

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

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. child protection policy, IT acceptable use policy) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access and prevent malicious software from harming our network(s)

9. Your Rights

Under the GDPR, you have rights which you can exercise free of charge, which allow you to:

- Know what we are doing with your information and why we are doing it.
- Ask what information we hold about you (Subject Access Requests).
- Ask us to correct any mistakes in our information about you.
- Object to direct marketing.
- Make a complaint to the Information Commission (IC).
- Withdraw consent (if applicable).

Depending on our reason for using your information, you may also be entitled to:

- Ask us to delete the information we hold about you.
- Have your information transferred electronically to yourself or another organisation.
- Object to decisions being made that significantly affect you.
- Object to how we are using your information.
- Stop using your information in specific ways.

We will always seek to comply with your request. However, we may be required to hold or use your information to comply with legal duties. Please note that your request may delay or prevent us from delivering a service to you.

For further information about your rights, including the circumstances they apply, see the ICO's guidance on individuals' rights under GDPR.

If you would like to exercise a right, please get in touch with our DPO.

10. Keeping your personal information secure

We take the security of personal data seriously and have implemented appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and accidental loss, destruction, or damage. These measures include:

- Regular data protection training for staff
- Use of strong passwords and encryption
- Regular security assessments and audits
- Secure storage and disposal of personal data
- Restriction of access to personal data to authorised personnel only

In the event of a data breach, we will take appropriate steps to mitigate the impact and comply with our legal obligations, including notifying affected individuals and the Information Commissioner's Office where necessary.

11. Complaints

If you have any concerns about how we handle your data, don't hesitate to contact our DPO.

If you are unsatisfied with our response, you can complain to the Information Commissioner's Office (ICO).

You can contact the IC at:

Information Commission Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Tel: 0303 123 1113

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

12. Further information

For further information about how the DfE uses your information:

To learn more about the pupil information, we share it with the DfE for data collection:

<https://www.gov.uk/education/data-collection-and-censuses-for-Trusts>.

For more information about the DfE's data-sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>.

For information about which organisations the department has provided pupil information (and for which project), please visit the following:

<https://www.gov.uk/government/publications/national-pupil-database-requests-received>.

To contact DfE: <https://www.gov.uk/contact-dfe>.