



Privacy Notice for Workforce (updated 1/9/2026)

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' to individuals where we are processing their personal data. Markland Hill School is required by law to collect and process personal information about our workforce. We are committed to being transparent about how we collect and use this information and to meet our data protection obligations.

This privacy notice explains how we collect, store and use personal data about our **workforce** in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This notice applies to our workforce. This includes current and former employees, workers and contractors. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical.

Who are we?

We are Markland Hill School. Our registered office is Markland Hill School, Markland Hill, Bolton, BL1 5EJ. The School is the 'data controller' for the purposes of data protection law and is registered with the Information Commission.

Markland Hill School has appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

The school's Data Protection Officer is Gill Smith.

What data do we collect?

We collect and process a wide range of information about our workforce. Information that we may collect, use, store and share (when appropriate) includes, but is not restricted to:

- Personal information such as name, date of birth, address, email address, phone numbers, emergency contact details, marital status and dependants).
- National insurance number.
- Contract information (such as start dates, hours worked, post, roles and salary information, bank/building society details).
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information.
- Details of periods of leave taken by you, including holiday, sickness absence, family leave and the reasons for the leave.
- Leaving date and your reason for leaving.
- Location of employment or workplace.

- Recruitment information (including copies of right to work documentation, social media checks, safer recruitment checks, references and other information included in a CV or cover letter or as part of the application process).
- Recruitment information relating to online checks that have been conducted using your name and date of birth.
- Any additional information recommended in the most recent Keeping Children Safe in Education document.
- Employment records (including job titles, work history, working hours, holidays, training records and professional memberships).
- Compensation history.
- Performance information.
- Disciplinary and grievance information.
- Information about your use of our information and communications systems.
- Meeting attendance records.
- Photographs.
- CCTV images.
- Data about your use of the School's/Trust's/MAT's information and communication systems.

What sensitive information do we collect?

We may also collect, store and use the following more sensitive types of personal information (known as 'special category data') including:

- Information about your race or ethnicity, religious beliefs, sexual orientation, and political opinions.
- Trade union membership details.
- Information about your health, including any medical conditions and sickness records, details of any absences including any statutory leave.
- Information about criminal convictions and offences.

How do we collect this information?

The School may collect this information in a variety of ways. For example, information might be collected through application forms, obtained from your passport or other ID documents, forms completed by you at the start of or during your employment (such as benefit nomination forms), from correspondence with you, through interviews, meetings or assessments.

The School may also collect information about you from third parties, such as from references from your former employer, information from employment background check providers, information from publicly available social media accounts, information from credit reference agencies and information from criminal records checks permitted by law.

At Markland Hill School references that have been given or received for education, training, employment, volunteering, or service provision are classed as being **confidential**. Under UK GDPR and the Data Protection Act 2018, confidential references are generally **exempt from Subject Access Requests (SARs)**. Under the Data Protection Act 2018 (Schedule 2), the exemption covers both the previous employer (who wrote it) and the new employer (who received it).

Why do we collect this data?

We have set out below a description of all the ways we plan to use workforce information and which of the legal bases we rely on to do so. Some of the reasons for collecting and using our workforce's personal data overlap, and there may be several grounds which justify our use of this data.

- (UK GDPR) Article 6(1)(b) – Performance of a contract: the processing is necessary for a contract you have with the person, or because they have asked you to take specific steps before entering into a contract
- (UK GDPR) Article 6(1)(c) – Necessary to comply with our legal obligations
- (UK GDPR) Article 6(a)(e) – Necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
- (UK GDPR) Article 6(1)(f) – Necessary for our legitimate interests to run the School
- UK Employment and Childcare Law including those in relation to:
 - School Staff (England) Regulations 2009 (as amended)
 - Safeguarding Vulnerable Groups Act 2000
 - The Childcare (Disqualification) Regulations 2009
 - Keeping Children Safe in Education

Purpose/activity	Type of Information	Lawful basis for processing information
To make a decision about your recruitment or appointment	• Contact details and personal details • Qualifications and experience • Rates of pay • Recruitment information	• Performance of a contract
To verify your identity	• Contact details and personal details • National insurance number	• Necessary to comply with our legal obligations
To determine the terms on which you work for us	• Contact details and personal details • Qualifications and experience • Rates of pay • Recruitment information	• Performance of a contract
To ensure you are legally entitled to work in the UK	• Contact details and personal details • Recruitment information	• Necessary to comply with our legal obligations
To pay you and, if you are an employee, to deduct tax and National Insurance contributions	• Contact details and personal details • National insurance details • Bank, payroll and tax details	• Necessary to comply with our legal obligations • Performance of a contract
To provide benefits to you	• Contact details and personal details • Employment records or terms of service	• Performance of a contract
To enrol you in a pension arrangement in accordance with our statutory automatic enrolment duties	• Contact details • National insurance details	• Necessary to comply with our legal obligations • Performance of a contract
To administer the contract we have entered into with you	• Contact details and personal details • Employment records or terms of service	• Necessary to comply with our legal obligations • Necessary for our legitimate interests to run the School, provision of our IT services, network security, to prevent fraud and in the context of a business reorganisation or

		group restructuring exercise
For Markland Hill School management and planning, including accounting and auditing	• Contact details and personal details • Employment records or terms of service • Salary or payment details	• Necessary for our legitimate interests to run the School and manage our workforce
To conduct performance reviews, managing performance and determining performance requirements	• Contact details and personal details • Employment records or terms of service	• Performance of a contract • Necessary for our legitimate interests to run the School and manage our workforce
To gather evidence for possible grievance or disciplinary hearings	• Contact details and personal details • Employment records or terms of service • Performance information • CCTV	• Necessary to comply with our legal obligations • Performance of a contract • Necessary for our legitimate interests of handling disputes
To deal with legal disputes involving you, or other employees, workers and contractors including accidents at work	• Contact details and personal details • Employment records or terms of service • Performance information • CCTV	• Necessary to comply with our legal obligations • Performance of a contract • Necessary for a recognised legitimate interest • Necessary for our legitimate interests of handling disputes
To make decisions about your continued employment or engagement	• Contact details and personal details • Employment records or terms of service • Performance information	• Necessary for a recognised legitimate interest • Necessary for our legitimate interests to run our business and manage our workforce
To make arrangements for the termination of our working relationship	• Contact details and personal details • Employment records or terms of service • Performance information	• Performance of a contract • Necessary for a recognised legitimate interest • Necessary for our legitimate interests to run our business and manage our workforce
For education, training and development requirements	• Contact details and personal details • Employment records or terms of service • Performance information • Training records	• Necessary to comply with our legal obligations • Performance of a contract
To monitor your use of our information and communication systems to ensure compliance with our safeguarding and data security policies	• Contact details and personal details • Details of ICT use • CCTV	• Necessary to comply with our legal obligations • Necessary for a recognised legitimate interest • Necessary for our legitimate interests to run the School, the provision of IT services and ensure network security
To ensure network and information security, including	• Contact details and personal details	• Necessary for our legitimate interests to run

preventing unauthorised access to our computer and electronic communication systems and preventing malicious software distribution	• Details of ICT use • CCTV	the School, the provision of IT services and ensure network security
To conduct data analytics studies to review and better understand employee retention and attrition rates	• Contact details and personal details • Rates of pay • Recruitment information • Employee records	• Necessary for our legitimate interests to better understand our workforce

Why do we collect and process sensitive information?

We have set out below a description of all the ways we plan to use more sensitive “special category data” of our workforce, and which of the legal bases we rely on to do so. Some of the reasons listed below for collecting and using our workforce’s personal data overlap, and there may be several grounds which justify our use of this data.

- Article 9(2)(c) - Vital interests
- Article 9(2)(b) - Necessary to comply with our legal obligations
- Article 9(2)(g) - Necessary for the performance of a task in the public interest

Purpose/activity	Type of Information	Lawful basis for processing information
To administer benefits including statutory maternity pay, statutory sick pay	• Contact details and personal details • National insurance number • Bank, payroll and tax details • Health and medical information	• Necessary to comply with our legal obligations • Schedule 1, Part 1, (1) Data Protection Act 2018 – Employment Purposes
To ascertain your fitness to work	• Contact details and personal details • Health and medical information • Occupational health records	• Necessary to comply with our legal obligations • Schedule 1, Part 1, (1) Data Protection Act 2018 – Employment Purposes
To manage sickness absence	• Contact details and personal details • Health and medical information • Occupational health records	• Necessary to comply with our legal obligations • Schedule 1, Part 1, (1) Data Protection Act 2018 – Employment Purposes
To comply with health and safety obligations	• Contact details and personal details • Health and medical information • Occupational health records	• Necessary to comply with our legal obligations • Schedule 1, Part 1, (1) Data Protection Act 2018 – Employment Purposes
To make reasonable adjustments	• Contact details and personal details	• Necessary to comply with our legal obligations

	• Health and medical information • Occupational health records	• Schedule 1, Part 1, (1) Data Protection Act 2018 – Employment Purposes
To ensure your suitability for work	• Contact details and personal details • Health and medical information • Occupational health records • Criminal offence and conviction data	• Necessary to comply with our legal obligations • Schedule 1, Part 1, (1) Data Protection Act 2018 – Employment Purposes
To ensure meaningful equal opportunities monitoring and reporting	• Information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation	• Necessary for the performance of a task in the public interest • Schedule 1, Part 2, (8), Data Protection Act 2018 – Equality of opportunity or treatment
To pay trade union premiums, register the status of a protected employee and to comply with employment law obligations	• Contact details and personal details • Trade union membership	• Necessary to comply with our legal obligations • Schedule 1, Part 1, (1) Data Protection Act 2018 – Employment Purposes
To ensure dietary needs are catered for	• Medical information	• Vital interests • Necessary to comply with our legal obligations

The use and withdrawal of consent

Where we have obtained consent to use our workforce's 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. If you change your mind, or you are unhappy with or use of your personal data, please let us know by contacting our Data Protection Officer (DPO).

Storing personal data

We keep workforce information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. Details of retention periods for different aspects of personal information are available upon request **OR** our Records Management and Retention Policy sets out how long we keep information about our workforce. This policy can be found on our website. After this period, we will securely destroy or anonymise personal information in accordance with data protection law.

Who do we share information with?

We routinely share workforce information with:

- Our local authority
- The Department for Education and/or EFSA
- Examining bodies
- Ofsted
- Law enforcement agencies
- Courts and tribunals
- Our auditors, insurers and other professional advisers
- Health and social welfare organisations

- Occupational health providers
- Other third parties we may engage the services of for the purposes of providing a public task or the administration of the School, for example our safeguarding monitoring software, our management information system provider (see Appendix 1)
- Other third parties to whom we may choose to transfer or merge parts of the School or our assets. Alternatively, we may seek to acquire other trusts, schools or academies or merge with them. If a change happens to the School, then the new management team may use your personal information in the same way as set out in the privacy notice.

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:

- To comply with our legal obligations.
- In connection with legal proceedings (or where we are instructed to do so by Court order)
- To contact your family or representatives to protect yours or their vital interests.

Why do we share information with the Department for Education (DfE)?

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

Specifically, we are required to share information about our school employees with our local authority (LA) and the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments. All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005. This means that:

Although schools and local authorities must meet their obligations to data subjects under the GDPR and the Data Protection Act, they do not need to obtain consent for the provision of information from individual members of the workforce. Schools and local authorities are protected from any legal challenge that they are breaching a duty of confidence to staff members.

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

The department 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.

The department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases 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; and
- The arrangements in place to securely store and handle the 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.

For more information about the department's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

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

International transfers of personal data

Your personal information may be transferred outside the UK and the European Economic Area ('EEA'), including to the United States. Where information is transferred outside the UK or EEA to a country that is not designated as "adequate" in relation to data protection law, the information is adequately protected by conducting a transfer risk assessment to ensure that security measures and other appropriate safeguards are in place to protect your information. For more information on international transfers please contact us at the details below.

Your rights

Data protection law gives our workforce certain rights about how their information is collected and used. To make a request for your personal information, please contact our Data Protection Officer by emailing gill@mindography.co.uk

Under data protection law, you also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of your personal information we have about you – this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances.
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commission if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- the right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- the right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- the right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.

How to access personal information we hold about you

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.

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
- 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 our data protection officer or Head Teacher. You are entitled to submit subject access requests all year round, but please bear in mind that it may be necessary for us to extend the response period when requests are submitted over the summer holidays. This is in accordance with article 12(3) of the GDPR and will be the case where the request is complex – for example, where we need multiple staff to collect the data.

At Markland Hill School references that have been given or received for education, training, employment, volunteering, or service provision are classed as being **confidential**. Under UK GDPR and the Data Protection Act 2018, confidential references are generally **exempt from Subject Access Requests (SARs)**. Under the Data Protection Act 2018 (Schedule 2), the exemption covers both the previous employer (who wrote it) and the new employer (who received it).

Complaints

If you have a concern about the way we are collecting or using your personal information, you have the right to make a complaint to us. Any complaints relating to data protection must be directed to our Data Protection Officer or Mrs J Kavanagh (Head Teacher). Data protection complaints will be dealt with in accordance with the procedure set out in our Data Protection Complaints Policy. The Policy and a Complaints Form can be found at [GDPR – Markland Hill Primary School](#) or by contacting Mrs J Kavanagh (Head Teacher).

If you remain dissatisfied with our response, you can make a complaint directly to the Information Commission at - [Make a complaint about how an organisation has used your personal information | ICO](#).

Contact us

If you have any questions about this privacy notice or the way in which we use your personal information, please contact our Data Protection Officer or insert school contact:

Data Protection Officer	Mrs Gill Smith	email: gill@mindography.co.uk
School Head Teacher hill.bolton.sch.uk	Mrs Jessica Kavanagh	email: kavanaghj@markland-hill.bolton.sch.uk