SOUTH DOWNS
LEARNING TRUST

Privacy Notice - School Workforce

Date approved	November 2025
Date of next Review	September 2026
Status	Mandatory
Lead Author	Mark Hatton (based on ESCC model)

Privacy notice will also be updated in line with UK GDPR changes

All our policies support our vision and are based on our core virtues

Compassion – Respect – Creativity – Teamwork – Effort - Responsibility

Developing caring, confident and creative students who achieve excellence

SDLT Privacy Notice
(How we use school workforce information)

South Downs Learning Trust (SDLT, or the trust) process personal data relating to those we employ to work at, or otherwise engage to work at, our schools. This is for employment purposes to assist in the running of the schools and/or to enable individuals to be paid. The collection of this information will benefit both national and local users by:

- improving the management of workforce data across the sector
- enabling development of a comprehensive picture of the workforce and how it is deployed
- informing the development of recruitment and retention policies
- allowing better financial modelling and planning
- enabling ethnicity and disability monitoring
- supporting the work of the School Teachers' Review Body

The categories of school workforce information that we collect, process, hold and share include:

- personal information (such as name, employee or teacher number, national insurance number), address history and proof of identity
- special categories of data including characteristics such as ethnic group, disability/access requirements or other medical information
- contract information (such as start dates, hours worked, post, roles and salary information)
- work absence information (such as number of absences and reasons)
- Qualifications and, where relevant, subjects taught
- relevant medical information
- images (such as in photographs, video and CCTV footage)
- payroll information

Why we collect and use this information

We use school workforce data to:

- enable the development of a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- enable individuals to be paid
- recruit and employ staff
- support pension payments and calculations
- monitor sickness
- preserve the school's history and collective memory

The lawful basis on which we use this information

Under current data protection legislation, the trust must identify a valid, lawful basis for any data processing they carry out. We process personal data in relation to staff using the following lawful bases:

UK GDPR Article 6 (1)

- Processing is 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;
- Processing is necessary for compliance with a legal obligation to which the controller is subject;
- The data subject has given consent to the processing of his or her personal data
- Processing is 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 9 (2)

- Processing is necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of employment
- Processing is necessary for the purpose of preventative or occupational medicine or for the assessment of the working capacity of the employee.
- Processing is necessary for reasons of substantial public interest.
- The data subject has given explicit consent to the processing of their personal data.
- We are required to for reasons of “public health”, for example during a pandemic

Please see the trust’s Special Category Data policy for more information about how we process this type of data. This policy can be found on our website: Key Information - South Downs Learning Trust (sdlt.org.uk)

Where we keep records and information containing personal data for a longer time, we do this for archiving purposes in the public interest. We keep these records to preserve the school’s history, key events and collective memory. We will provide access to these records for research or statistical purposes, taking reasonable measures to protect the personal data they may contain.

Collecting workforce information

We collect personal information via application for employment forms, pre-employment checks, staff contract forms, CCTV recordings and records of attendance meetings.

Workforce data is essential for the trust’s operational use. 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 data protection legislation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

Storing workforce information

We hold data securely for the set amount of time shown in our retention schedule. For more information on our SDLT retention schedule and how we keep your data safe, please visit Key Information - South Downs Learning Trust (sdlt.org.uk)

We will keep a limited and reasonable amount of personal information for a longer time, where it appears in records that are of historic value or it is in the public interest to keep as

part of the school's history and collective memory. We store these records securely in our school archive for permanent preservation.

Who we share this information with

We routinely share this information with:

- Statutory sharing with our local authority
- the Department for Education (DfE)
- Traded services purchased through the LA (e.g. for Legal, Human Resources or Information Governance Support)
- Learning platforms or software providers used by the schools to support education provision
- South Downs Learning Trust members

We only share data with organisations who have adequate security measures and protections in place.

Why we share school workforce information

We do not share information about workforce members without consent unless the law and our policies allow us to do so.

Local authority
We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Department for Education (DfE)
We are required to share information about our school employees with the (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

All data is transferred securely and held by DfE under a combination of software and hardware controls which meet the current government security policy framework, available online.
For more information, please see 'How Government uses your data' section.

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact DPO@SDLT.org.uk

You also have the right to:

- ask us for access to information about you that we hold
- be informed about the collection and use of your personal data – this is called 'right to be informed'
- request for your personal data to be rectified, if it is inaccurate or incomplete

- request the deletion or removal of your personal data where there is no compelling reason for its continued processing
- object to processing of personal data in certain circumstances
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing); and
- a right to seek redress, either through the ICO, or through the courts

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:

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

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at https://ico.org.uk/concerns/

For further information on how to request access to personal information held centrally by DfE, please see the 'How Government uses your data' section of this notice.

Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by our Data Protection Officer (DPO@SDLT.org.uk)

Data Protection Officer

Our Data Protection Officer is Peter Questier (East Sussex County Council, Information Governance Team. Children's Services)

However, please contact the trust in the first instance if you have a query regarding this privacy notice or how your information is used, by emailing: DPO@SDLT.org.uk

How Government uses your data

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

- informs DfE policy on pay and the monitoring of the effectiveness and diversity of the school workforce
- links to school funding and expenditure
- supports 'longer term' research and monitoring of educational policy

Data collection requirements

The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). 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.

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.

Sharing by the Department for Education

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

The Department for Education (DfE) will only share your personal data where it is lawful, secure and ethical to do so and 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 the Department for Education (DfE) releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of public benefit, proportionality, legal underpinning and strict information security standards.

For more information about the Department for Education's (DfE) 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 for Education (DfE) has provided information, (and for which project) please visit the following website: https://www.gov.uk/government/publications/dfe-external-data-shares

How to find out what personal information DfE hold about you

Under the terms of the Data Protection Act 2018, you're entitled to ask the Department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department, you should make a 'subject access request'. See the guide for details:

https://www.gov.uk/government/publications/requesting-your-personal-

information/requesting-your-personal-information#your-rights

Further information on what personal information the Department for Education (DfE) holds about you is published in the privacy notice for education providers' workforce, including teachers. This is available below:

https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers

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

Last updated

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on October 2025.