DATA PROTECTION / GDPR PRIVACY NOTICE

For Workforce & Governance

Thornton Primary School

Who processes your information?

Thornton Primary School is the data controller of the personal information you provide to us. This means the school and its Governing Board is responsible for deciding how information you provide us with, is used. We refer to your information as "personal data" and when we use your information in different ways, this is called "processing". The Data Protection Act 2018 (DPA) and the UK General Data Protection Regulation (GDPR) outline how personal data should be protected and used appropriately by organisations.

In some cases, your personal data may be shared with other people, organisations or agencies as necessary. This sharing will only occur if we have a statutory or legal obligation to do so or after we have sought your permission (consent). If we share your personal data with those who provide essential systems and services to school, we ensure that the same data protection standards are in place on a contractual basis.

The categories of workforce / governance information that we process include:

- Personal identifiers and contacts (such as name, employee number, national insurance number, contact details and address)
- Characteristics (such as ethnicity, gender, age)
- Contract and employment information (such as start date, hours worked, post, roles and salary information, Right to Work checks, Disclosure and Barring Service checks)
- Relevant medical information (such as doctor's details, medical conditions, allergies)
- Work absence information (such as number of absences and reasons)
- Qualifications (and where relevant, subjects taught)
- Payroll information (such as salary, bank details)
- Performance information (such as records of observations, development plans, CPD, outcomes of disciplinary and/or grievance procedures)
- Governance details (such as role, start and end dates and governor ID)

Why do we collect and use your information?

Thornton Primary School holds personal data relating to employees, volunteers, trainees, Governors, and individuals who may visit or support the school in other ways. We may also receive information from previous employers, Local Authorities and/or the DfE. We may share personal data with other agencies as necessary under our legal obligations or otherwise in accordance with our duties as a school and Public Authority.

We will use your personal information for the following:

- the recruitment process and for carrying out pre-employment checks
- safeguarding pupils
- checking your identity and right to work in the UK
- checking your qualifications
- to keep an audit trail of the checks we have made and our relationship with you in case of employment claims
- for managing your contract of employment and undertaking our statutory responsibilities as an employer
- to set up payroll and pension, and to reimburse expenses
- communicating with you, including for marketing purposes
- carrying out our role as your employer or potential employer
- supporting performance management
- to support the management of IT devices, networks and internet access to meet duties in relation to filtering and monitoring

We use workforce data to:

a) enable the development of a comprehensive picture of the workforce and how it is deployed
b) inform the development of recruitment and retention policies
c) enable individuals to be paid

We use governance data to:

a) meet the statutory duties placed upon us
b) essential school operational use

We collect and use personal data in order to meet our legal requirements, perform public tasks, undertake duties that are necessary for the performance of a contract as set out in the UK GDPR and UK law, including those in relation to the following:

- Education Act 1996 & 2011
- School Staffing (England) Regulations 2009 for maintained schools
- Safeguarding Vulnerable Groups Act 2006
- The Childcare (Disqualification) Regulations 2009
- Keeping Children Safe in Education regulations

We process special category data on the conditions that processing is necessary for reasons of employment, social security and social protection law, substantial public interest and explicit consent as set out in UK data protection law.

All maintained school governing bodies, under section 538 of the Education Act 1996 have a legal duty to provide the governance information as detailed above.

Whilst the majority of the personal data you provide is mandatory, some is provided on a voluntary basis. You will be informed whether you are required to provide this data or if consent is required.

How long is your data stored for?

Your personal data will be held securely in line with the school's GDPR Data Protection Policy and Records Management & Retention Policy.

In accordance with UK GDPR, the school does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected.

We will also retain personal data in the form of images, registers and examples of work for the purposes of archiving and as a historical record of school life. This information may later be published in school literature, displays or external media. In this case, the personal data we retain will be proportionate and limited to what is necessary.

Who we share workforce / governance information with

The school will routinely share information with:

- The Department for Education
- Birmingham City Council
- Other Government agencies (Ofsted)
- HM Revenues and Customs
- Department for Work and Pensions
- Payroll Services (Birmingham City Council, Capita / iTrent)
- Providers of our pension schemes (TPS, LGPS)
- Occupational Health Services (Health Partners)
- Insurance Services (Birmingham City Council)
- Auditors (Birmingham City Council)
- Past and prospective employers (recruitment purposes)
- Contract IT Services (Entrust)
- Contract HR Services (Birmingham City Council / Capita)
- Contract Governor Services (Birmingham City Council / SGS)
- Contract Data Management Services (Birmingham City Council / Capita)
- The providers of our management information system (SIMS)
- The software we use to communicate with you (Parent Pay, SIMS)
- The entry/signing in system (InVentry)
- The providers of CCTV and door access system (Inhouse, Deveraux Data)
- The providers of our learning platform (Google Classroom)
- The systems we use for active monitoring and filtering (Smoothwall and Lightspeed)

Why we share workforce and governance information?

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

We are required to share information about our governance roles with the Department for Education (DfE) under section 538 of the Education Act 1996

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.

We do not share information about our workforce and individuals in governance roles with anyone without consent unless the law and our policies allow us to do so.

How the 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 and expenditure;
- supports 'longer term' research and monitoring of educational policy.

The governor data we share with the DfE is entered manually on the GIAS system and held by the DfE under a combination of software and hardware controls which meet the current government security policy framework.

The governor data that we lawfully share with the DfE via GIAS:

- will increase the transparency of governance arrangements;
- will enable schools and the department to identify more quickly and accurately individuals who are involved in governance and who govern in more than one context;
- allows the department to be able to uniquely identify an individual and in a small number of cases conduct checks to confirm their suitability for this important and influential role.

Data collection requirements

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

Governance:
To find out more about the requirements placed on us by the Department for Education (DfE) including the
governance data that we share with them, go to https://www.gov.uk/government/news/national-databaseof-governors

Sharing by the Department of Education

The Department of Education 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 of Education 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 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.

To contact the Department of Education: https://www.gov.uk/contact-dfe

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

What are your rights?

Under data protection legislation, you have the right have the right to request access to information about you that we hold. To make a request for your personal information contact our Data Protection Officer (see details in 'Contact' section below).

You also have the right to:

- ask us for access to information about you that we hold
- have your personal data rectified, if it is inaccurate or incomplete
- request the deletion or removal of personal data where there is no compelling reason for its continued processing
- restrict our processing of your personal data, in some circumstances
- object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

Where the processing of your data is based on your consent, you have the right to withdraw this consent at any time.

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

Contact

If you would like to discuss anything in this privacy notice, please contact:
enquiry@thornton.bham.sch.uk
or by writing to Thornton Primary School, Thornton Road, Ward End, Birmingham B8 2LQ.

Revisions and last updated

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time.
Last update: September 2026