Privacy Notice for Workforce & Governance

What is a Privacy Notice?

The Data Protection Act 2018 gives everyone the right to be informed about how their information is used by organisations. This Privacy Notice explains how Annie Lennard Primary School uses information about its Workforce (employees, volunteers and trainees) and Governance (governors). If you can be identified from the information we hold, then this is known as "personal data".

This Privacy Notice explains:

- why we use your personal data
- the reasons we need to do this
- what kinds of personal data we use
- where we collect your personal data from
- who we will share your personal data with
- how you can find out more.

Who processes your information?

Annie Lennard Primary School is the data controller of the personal information you provide to us. This means the school 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 (UKGDPR) outlines 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 legal obligation or duty to do so or after we have sought your permission (consent), If we share your personal data outside of the school, we ensure that the same data protection standards are upheld by other people involved in processing your personal data.

The categories of 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 information (such as start date, hours worked, post, roles and salary information)
- safeguarding information (such as DBS)
- relevant medical information (such as Doctors 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, position, start date)
- governance details (such as role, start and end dates and governor ID)

Why we collect and use your information

We hold personal data relating to employees, members of our governance boards and individuals who may visit or support our schools in other ways. We may also receive information from previous employers, Local Authority 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.

We will use your personal information for the following:

- for the recruitment process and for carrying out pre-employment checks;
- for safeguarding students;
- for checking your identity and right to work in UK;
- for managing your contract of employment and undertaking our statutory responsibilities as an employer
- for checking your qualifications;
- to keep an audit trail of the checks we have made and our relationship with you in case of employment claims;
- to set up payroll and pension and to reimburse expenses;
- for communicating with you, including for marketing purposes;

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 Governor data to:

a) to meet the statutory duties placed upon us

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing pupil information for general purposes are:

- Article 6, 1, (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes
- Article 6, 1, (b) 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
- Article 6, 1, (c) processing is necessary for compliance with a legal obligation to which the controller is subject

The basis/bases we rely on for processing pupil special category information for general purposes are:

- Article 9, 1, (a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject
- Article 9, 1, (b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject

We also collect and use personal data where it is necessary to meet the legal responsibilities set out in data protection legislation, other UK law and regulation that applies to schools. These include the following:

- Education Act 2011
- Safeguarding Vulnerable Groups Act 2006
- The Childcare (Disqualification) Regulations 2009
- Keeping Children Safe in Education 2026 regulations

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 it is requested on a voluntary basis.

Collecting workforce and governance information

We collect personal information via staff application forms, data collection sheets, governor contact forms.

Workforce data is essential for the school's / local authority's operational use.

Governance roles data is essential for the school's operational use.

Whilst the majority of personal information you provide to us 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.

Storing workforce and governance data

Personal data is stored in line with the School's records management policy and procedure. This policy is based on retention guidance published by the Information Records Management Society (IRMS) in their toolkits for schools and academies.

In accordance with 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.

Who we share workforce information with

The school will routinely share information with:

- The Department for Education (DfE)
- Sandwell Local Authority
- Other Government agencies (Ofsted)
- HM Revenues and Customs
- Department for Work and Pensions
- Education / training bodies (SIPS, National College)
- Payroll Services (Sandwell MBC)
- Providers of our pension schemes (TPS & LGPS)
- Occupational Health Services (Sandwell OH)
- Insurance Services (Zurich through Sandwell MBC)
- Auditors (Sandwell MBC)
- Past and prospective employers (recruitment purposes)
- Contract IT Services (SIPS)
- Contract HR Services (SIPS)
- Contract Governor Services (SIPS)
- Contract Catering Services (SIPS)
- School Photographer (Apperture)
- The providers of our management information system (SIMS)
- The software we use to communicate with you (School Comms)
- The entry/signing in system (EDIT)
- The online software we use to help us manage visit and health & safety (Evolve)
- The systems we use for active monitoring and filtering of online activities (Senso through SIPS)

Why we share school workforce and governor information

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

We are required to share information about our school employees with the Department for Education (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 governors with our local authority (LA)

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 workforce data is transferred securely and held by the Department for Education (DfE) under a combination of software and hardware controls which meet the current government security policy framework.

All governors data is entered manually on the GIAS service and held by the Department for Education (DfE) under a combination of software and hardware controls which meet the current government security policy framework

For more information, please see 'How Government uses your data' section.

Your Information Rights

Data Protection law provides you with certain rights.

Requesting access to your personal data

You have the right to request access to information about you that we hold.

To make a request to access your personal information, please contact our Data Protection Officer using the details in the "Who to Contact" section.

Your Other Information Rights:

- **The right to know how your information is being used** – We uphold this by publishing Privacy Notices and letting you know how your information will be used when we collect it.
- **The right to have inaccurate information amended** - We uphold this right by asking your to review the information we hold on record and updating information if you provide evidence to show it has changed
- **The right to have information removed or deleted from your records** – We uphold this right by removing or deleting your information that we are no longer required to keep
- **The right to temporarily restrict how your information is used** - We uphold this right by not using information until we have confirmed what is accurate, unless it is necessary to do so
- **The right to object to us using your data for certain purposes** – We uphold this by asking for your consent or permission to use your information for these purposes (including direct marketing and for scientific/historical research and statistics)
- **The right for important decisions about you not to be made solely by automated systems that use your information (like computer algorithms and AI**) – We uphold this right by letting you know if these systems are used and giving you a choice for these types of decisions to be reviewed.

Who to Contact

Annie Lennard Primary School has a Data Protection Officer (provided by Services 4 Schools Ltd). Their role is to oversee and monitor our data protection procedures, and to make sure we are compliant with data protection legislation.

The Data Protection Officer is also responsible for helping the workforce uphold their information rights.

If you would like to discuss anything in this privacy notice, please contact our Data Protection Officer:

Email: DPO@services4schools.org.uk

In writing: **For the attention of the Data Protection Officer**

Annie Lennard Primary, The Oval, Smethwick, West Midlands B67 6LE

Complaints or Concerns

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we've done something wrong.

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with our Data Protection Officer in the first instance. (please see the contact details above).

We will acknowledge your complaint as soon as possible - usually within 10 working (school days), unless school is closed for an extended period (end of term, end of the academic year).

The Data Protection Officer will review your concerns and contact you within 30 working (school) days to confirm the outcome and report and findings.

If after the Data Protection Officer has completed their review, you remain unsatisfied with how your personal data has been handled, you also have the right to raise a concern with the Information Commissioner's Office at https://ico.org.uk/concerns/

For complaints not related to how your personal data is being handled, please refer to our complaints procedure, which is available on our website: https://alp.sch.life/

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.

This version was last updated **November 2026**

How Government uses your data

The workforce data that we lawfully share with the Department for Education (DfE) through data collections:

- informs the Department for Education (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

The governance data that we lawfully share with the Department for Education (DfE) via GIAS will:

- increase the transparency of governance arrangements
- enable local authority maintained schools, academies, academy trusts and the Department for Education (DfE) to identify more quickly and accurately individuals who are involved in governance and who govern in more than one context
- allow the Department for Education (DfE) 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-collection-and-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-database-of-governors

Some of these personal data items are not publicly available and are encrypted within the GIAS system. Access is restricted to authorised Department for Education (DfE) and education establishment users with a Department for Education (DfE) Sign-in (DSI) account who need to see it in order to fulfil their official duties. The information is for internal purposes only and not shared beyond the Department for Education (DfE) unless the law allows it.

Sharing by the Department for Education (DfE)

The Department for Education (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) 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:

- 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.

How to find out what personal information the Department for Education (DfE) hold about you

Under the terms of the Data Protection Act 2018, you're entitled to ask the Department for Education (DfE):

- 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 for Education (DfE), 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 published in the privacy notices for early years foundation stage to key stage 3:

https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3

To contact the Department for Education (DfE): https://www.gov.uk/contact-dfe