



Horningsham Primary School

Church Street, Horningsham, Warminster, Wiltshire, BA12 7LW

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Headteacher: Mrs Odele Lapham

Workforce Privacy Notice

Introduction

We are committed to protecting the privacy and security of your personal data. This Privacy Notice explains how we collect, use, and protect the personal data of employees, contractors, volunteers, and other members of the school workforce. It also outlines your rights regarding your personal data and how to exercise them.

Who We Are

Horningsham Primary School, is the data controller of the personal data you provide.

The Personal Data We Collect

We collect and process the following categories of data:

- Personal Information: Name, date of birth, gender, address, phone numbers, email addresses, NI number, employee/teacher number
- Employment Information: Recruitment info, right to work, references, qualifications, contract details, salary, payroll, pension, benefits
- Performance & Disciplinary: Appraisals, disciplinary records, absences, training records
- Special Category Data: Health conditions, disabilities, ethnicity, trade union membership, criminal record information (if applicable)
- Emergency Contacts: Next of kin and emergency contact details

Why We Collect and Use This Data

We use workforce data to:

- Manage and administer your employment or engagement with the school
- Enable payment, benefits, and pension administration
- Comply with legal duties, including safeguarding, health & safety, and statutory reporting
- Develop and monitor recruitment and retention policies
- Ensure performance and training management
- Contact next of kin in emergencies
- Complete statutory data collections (e.g., School Workforce Census)

Lawful Basis for Processing

We rely on the following lawful bases under UK GDPR:

- Contract (Art. 6(1)(b)) – Performance of your employment contract
- Legal Obligation (Art. 6(1)(c)) – Compliance with employment, tax, HMRC, health & safety, and safeguarding laws
- Public Task (Art. 6(1)(e)) – Completing statutory tasks in the public interest, e.g., census reporting
- Legitimate Interests (Art. 6(1)(f)) – For internal workforce management where your rights are not overridden (e.g., staff communications, workforce planning)
- Vital Interests (Art. 6(1)(d)) – Protecting life in an emergency

DUAA / RLI Note: Recognised Legitimate Interests under DUAA generally do not apply to routine workforce processing but could be used in rare cases for voluntary or collaborative non-statutory projects involving staff data (e.g., research projects, pilot initiatives).

Special Category Data (Art. 9 UK GDPR):

- Explicit consent (Art. 9(2)(a))
- Employment or social protection law obligations (Art. 9(2)(b))
- Vital interests (Art. 9(2)(c))
- Legitimate activities with safeguards (Art. 9(2)(d))
- Health or social care purposes, including occupational health assessments (Art. 9(2)(h))

Collecting Workforce Information

Most information is mandatory; optional data will be clearly identified and voluntary.

Data Retention

Data is retained only as long as necessary, including:

Compliance with statutory duties (Education Act 1996, Education (Supply of Info) Regulations 2007, Keeping Children Safe in Education, DBS, HMRC, Limitation Act 1980)

Typical retention: 7 years post-employment unless longer retention is legally required

Who We Share This Information With

- Data is shared as necessary with:
- Local Authority (LA)
- Department for Education (DfE)
- Payroll and pension providers
- Occupational health and wellbeing providers
- HMRC and other government departments

Sharing without consent occurs only where legally justified or in accordance with school policy.

Statutory Data Sharing

We share data under statutory obligations:

- Section 5, Education (Supply of Information about the School Workforce) (England) Regulations 2007
- Sections 113 & 114, Education Act 2005

For more information on DfE workforce data:

- <https://www.gov.uk/education/data-collection-and-censuses-for-schools>
- <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

International Data Transfers

Personal data is not routinely transferred outside the UK; if it is, appropriate safeguards are in place.

Your Data Protection Rights

Under UK GDPR, you can:

- Request access to your data
- Request correction
- Request deletion (in certain circumstances)
- Object to or restrict processing

- Request data portability (limited circumstances)
- Withdraw consent (where applicable)

Contact the school office or DPO to exercise your rights.

Data Security

Technical and organisational measures include:

- Secure, encrypted storage
- Password protection and restricted access
- Staff training and policies
- Physical security for paper records

Contact Information for Questions or Concerns

School Office:

Tel: 01985 844342

Email: admin@horningsham.wilts.sch.uk

DPO: Jeremy Shatford

Email: dpo@jeremyshatford.co.uk

ICO: <https://ico.org.uk/concerns/>

Changes to This Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in our practices, legal requirements, or operational needs. We will notify you of any significant changes and encourage you to review this notice regularly. The date of the last update is shown at the bottom of this notice.

Last Updated: October 2025