

Governor Privacy Notice

How we use personal information relating to our governing board and or Trust Board/Local Governing boards

Data Controller	Heathwood Lower School
	Heath Road Leighton Buzzard Beds LU7 3AU

This Privacy Notice is to let you know how we as an educational setting look after personal information about our governors. This notice explains the reasons why we hold personal information, how we use this information, who we share it with and how we keep it secure. This notice meets with the requirements of the General Data Protection Regulations (GDPR).

A copy of this Privacy Notice is available on our website www.heathwoodlower.com/dataprotection. Please refer to the website copy of this Privacy Notice for the latest version as it will be updated from time to time to reflect any changes in our circumstances.

If you have any questions or queries or would like to discuss anything in this Privacy Notice, please contact: The School's Office Manager on 01525 377096.

How we collect governor/trustee information

We obtain governor information through the Clerk to the Governors from the date of your interview and/or appointment. We are also obliged to hold governor information on our Single Central Record. We also collect any changes to your information throughout the year to keep our information about you as up-to-date as possible.

We collect and hold governor information that includes:

- Details such as name and address
- Secure school email address
- Contact telephone number(s)
- Special category data such as ethnicity, disability and access requirements
- Business and personal pecuniary interests
- An enhanced DBS check
- Governor role and category
- Date of appointment
- Governor training record
- Record of skills
- Record of attendance at governing board meetings

Why we collect and use this information

We use the data to:

- Establish and maintain effective governance
- Conduct the work of the governing board in accordance with the Nolan principles of public life
- Facilitate effective communication
- Record attendance at meetings
- Identify training needs and monitor attendance at training
- Meet statutory obligations for publishing and sharing governor/trustee details in the interests of openness and transparency
- Communicate between governors to help conduct the business of governance
- Communicate with the local authority in order to receive details about training opportunities, course administration, governance resources and news items
- Facilitate safer recruitment as part of our safeguarding obligations towards our pupils

The lawful basis on which we hold and use this information

We use your personal information under the legal basis of **public interest** and legal obligation so **that** Governors and the Governing Board can undertake their duties. The information is held and used under the following legislation and associated guidance:

- The School Governance (Roles, Procedures and Allowances) (England) Regulations 2013
- The School Governance (Constitution) (England) Regulations 2012

There may be some information we ask for which is not mandatory and which we collect on the legal basis of legitimate interest (e.g. photographs). We will ask you for your explicit consent about how these data items can be used if the purpose for holding the data extends beyond public interest or legal obligation. As a governor you can change your decision to grant or withdraw consent at any time.

If at any point in the future, we seek to use any previously collected information for another purpose or use the information in new software, we will ask for your explicit consent to do so.

Who we share governor information with

We routinely share governor/trustee information with:

- Other governors within our school
- Central Bedfordshire Council to meet our legal obligations
- The Department for Education (DfE) to meet our legal obligations and enable DfE to upload limited details about governance arrangements to the 'Get Information About Schools' website: <https://get-information-schools.service.gov.uk/>

- Suppliers and service providers to enable them to provide the service they are contracted to deliver
- Professional advisers and consultants who are connected with the school to provide school improvement services

We actively ensure that all of the third party software organisations we share data with comply with the General Data Protection Regulations through their Privacy Notices and Data Sharing Agreements that they share with us.

There may also be occasions when our Governing Board commissions external third parties for specific activities to support the work of the Governing Board (e.g. an auditor for external accreditation; a local Leader of Governance for support, mentoring or time-limited participation on the Governing Board). In all cases, we will ensure that data privacy regulations and confidentiality are being followed through Privacy Notices and Data Sharing and Confidentiality Agreements.

Why we share governor information with external parties

We do not share information about our governors with anyone without consent unless the legal basis for holding and sharing the data allow us to do so.

We share governor information with the Department for Education (DfE) and the Local Authority on a statutory basis when LA governors are nominated for appointment by the LA.

The data shared with the DfE and the local Authority is **for the purpose of:**

- Ensuring openness and transparency in our governance structures
- Avoiding conflict of interest for the purposes of financial accountability
- To conduct work in accordance with the Nolan principles of public life.
- To enable governors to access training opportunities and to enable governing board development.

How we keep personal data secure

The school fully adhere to our Data Protection policies which outline our procedures and processes for accessing, handling and storing data safely in accordance with all the GDPR principles. These policies are regularly reviewed and ratified by our governors. The following processes ensure that we comply with data protection legislation in how we manage the protection of personal data:

- Our networks, file systems and server operating systems are secured through firewalls and spyware/ virus detection programs on our servers to prevent unauthorised access to our data
- Data held in a physical location within the school is held securely and only accessible by staff with appropriate authorisation
- Access to data on systems is through individual passwords which are carefully managed and monitored
- Any data that is removed from the school is minimised and encrypted
- Older data is safely removed from computers and other devices
- Data shared with the DfE and the Local Authority is shared through secure file transfer systems. Any data shared with other legitimate third parties where there is a legal basis for sharing will only be shared through secure methods.
- We ensure all staff receive regular training on data protection

We also adhere to our **Data Breach Procedures Policy** in the event of a data breach. These procedures explain how our school responds to occurrences of known or reported data breaches. A copy of this policy is available on our school website at www.heathwoodlower.com/dataprotection.

Requesting access to your personal data

Under data protection regulations, you have the following rights that apply as a school governor:

- Right to be informed
- Right to access to your personal information
- Right to have inaccurate personal data rectified, blocked, erased or destroyed in certain circumstances
- Right to object to processing of personal data that is likely to cause, or is causing, damage or distress
- Right to restrict processing for the purpose of direct marketing
- Right to data portability
- Right to object to decisions being taken by automated means
- Right to claim compensation for damages caused by a breach of the Data Protection regulations

It should be noted that some of these rights will not apply in circumstances where allowing them would significantly reduce or prevent our ability to perform our duties within the school and safeguard the children in our care.

You do have the right to request access to personal information about you. To request access to your personal information as a governor you can make a **Subject Access Request (SAR)**. For further information about this contact the School's Office Manager

Our governing board will follow procedures outlined in the school **Subject Access Request Policy** available from our website www.heathwoodlower.com/dataprotection which follows the guidelines promoted by the data protection regulations.

Please note that whilst we aim to respond to requests within the required time period of one month, we may not be able to honour this time period if we receive requests just before or during school holidays. If the nature of the request is complex and/or the request falls within a holiday period, we will aim to reach a mutually agreed alternative time period.

How long we keep personal information

We hold governor data for the period determined appropriate for the different types of data we hold. We will normally store your data until you cease to become a governor, however we are required to keep minutes of meetings in perpetuity and these minutes are likely to include some information about you.

We will keep information for the minimum period necessary in accordance with DfE's data retention recommendations which take into account legal and safeguarding considerations linked to the types of data held. Our **Data Retention Schedule** can be found on our website at www.heathwoodlower.com/dataprotection.

All information is held securely and will be destroyed as appropriate under secure and confidential conditions.

Let us know of any changes to personal information and emergency contact information

We would encourage you to ensure that any changes to phone numbers in particular are notified to our Clerk to the Governing Board as soon as possible.

Reporting concerns about our data protection processes

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

Keeping you informed through this Privacy Notice

We aim to keep you informed of any changes to our data collections and data protection obligations through this Privacy Notice – the latest copy will be available on our website at www.heathwoodlower.com/dataprotection.