



## PRIVACY NOTICE: SCHOOL GOVERNORS

Hook Infant School is the Data Controller for the use of personal data in this privacy notice.

### Why do we collect and use personal data?

The collection and use of the personal data of pupil, parent and staff is conducted to allow the school to perform its contractual obligations, official functions, public interest tasks and other legal requirements.

The statutory provisions covering these areas include:

- The Education Act 1996
- DfE 'Keeping Children Safe in Education' 2018

We use Governor data for a range of purposes including, but not restricted to the following:

- to meet the statutory duties placed upon us.
- inform the development of recruitment and retention policies.
- allowing better organisational and accountability planning.
- the administration of the governing body. e.g. governor elections, appointing governors, skills audit, arranging or providing training and development.
- enabling ethnicity and disability monitoring.
- safeguarding and financial propriety checks

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

- personal information (such as name, address, contact information, date of birth, etc)
- previous governing experience (such as school name, type of governor and period of office)
- special categories of data including characteristics information such as gender, age band, ethnic group and disabilities.
- appointment information (e.g. start and end dates, type of governor, appointed by, term, committees, responsibilities (e.g. vice chair) and governor ID)
- attendance record (e.g. at governing body and committee meetings)
- business and other interests (e.g. business and pecuniary interests, relationships with members of school staff, governor roles at any other schools)
- qualifications, relevant skills and a history of training or CPD events
- Criminal convictions or related records

### Collecting Governor Information

Governor data is essential for the school's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it may be requested on a voluntary basis. In order to comply with the Data Protection Act 2018 and 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.

We use the following documentation or processes to collect and manage your data:

- Hampshire County Council's School Governor Application Form
- Hampshire County Council's Data Protection Declaration
- Hampshire County Council's Equalities Monitoring Form
- Gov.UK's Disclosure and Barring Service (DBS) check

## The lawful basis on which we process this information

In order to process personal data, Hook Infant School need to identify a lawful basis as set out in the UK General Data Protection Regulation. One or more lawful basis from Article 6 is required for all personal data. One or more lawful basis for processing from Article 9 for special categories of personal data. The legal bases we use for processing Governor data are:

### Lawful bases in Article 6, Section 1 (All personal data)

- The legal basis of **Public Task** covers most of the personal data we process relating to governance and accountability obligations.
- **Legal obligation** allows the School to process and/or share personal data if we are legally required to, such as DfE or local authority census and meeting other legal requirements (The Equality Act, etc).

### Lawful bases in Article 9, Section 2 (Special Category data)

Where not covered by the above, we may also use the following legal bases for Special Category Data:

- **Necessary for reasons of substantial public interest** The School may process special category data under the following conditions in Part 1 and Part 2 of Schedule 1:
  - Statutory and government purposes (paragraph 6)
  - Equality of opportunity or treatment (paragraph 8)
  - Racial and ethnic diversity at senior levels of organisation (paragraph 9)
  - Preventing or detecting unlawful acts (paragraph 10)
  - Protecting the public against dishonesty (paragraph 11)
  - Regulatory requirements relating to unlawful acts and dishonesty (paragraph 12)
  - Safeguarding of children and of individuals at risk (paragraph 18)
  - Disclosure to elected representatives (paragraph 24)

The School may also process criminal offence data under the following conditions in Parts 1 and 2 of Schedule 1:

- Statutory and government purposes (paragraph 6)
- Preventing or detecting unlawful acts (paragraph 10)
- Protecting the public against dishonesty (paragraph 11)
- Regulatory requirements relating to unlawful acts and dishonesty (paragraph 12)
- Safeguarding of children and of individuals at risk (paragraph 18)
- **Consent** is used as a legal basis when the school is not required to collect the data to meet its obligations. The Equalities Monitoring form includes the option of “I do not wish to provide this information” to ensure governors are aware that they are not required to provide this data.

Some of the reasons listed above for collecting and using personal information overlap, and there may be several grounds which justify our use of your data.

## Storing Governor Data

We hold data securely for the set amount of time shown in time in accordance with Hampshire’s ‘School Records Retention Schedule’. For more information on the data retention schedule and how we keep your data safe, please discuss this with Jayne Lodder, Clerk to the Governors.

Governor data stored within the school, such as the Clerk’s files and electronic documents are protected by the school’s IT security arrangements, including encrypted backup to our offsite storage site maintained by Agile ICT. All electronic documentation relating to governors and the governing body are stored in a secure drive separate to the main drives accessed by curriculum and admin staff and only accessible by the Business Manager/Clerk to the Governors.

## Who we share governor information with

We routinely share your information with:

- Hampshire Governor Services
- Department for Education (DfE)
- Agile ICT (encrypted backups only, to meet our data and IT security standards)

- GovernorHub (The school shares name, email and DBS certificate, individual Governors include any other data themselves)

The governor data that we lawfully share with Hampshire Governor Services via Write Access helps to:

- plan and advertise vacancies
- monitor governing body appointments
- plan and deliver training opportunities
- create strategic planning and policies across the county

The governor data that we lawfully share with the DfE via Get Information About Schools (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**

To find out more about the requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/government/news/national-database-of-governors>

**Note:** Some of these personal data items are not publically available and are encrypted within the GIAS system. Access is restricted to a small number of DfE staff 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, unless the law allows it.

### **Department for Education**

The Department for Education (DfE) collects personal data from educational settings and local authorities. We are required to share information about our governors with the Department for Education (DfE), under [section 538 of the Education Act 1996](#)

All data is entered manually on the GIAS system and held by DfE under a combination of software and hardware controls which meet the current [government security policy framework](#).

### **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 Jayne Lodder, Clerk to the Governors. You also have the right to:

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

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/>

### **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 using the contacts at the end of this document.

## **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 **9 November 2018**

## **Contact**

If you would like to discuss anything in this privacy notice, please contact either of the following:

Clerk to Governors	Jayne Lodder Hook Infant School Church View, Hook Hampshire. RG27 9NR	Data Protection Officer	Peter West Hook Infant School Church View, Hook Hampshire. RG27 9NR
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