Privacy Notice for School Governors

1. Introduction

We collect and use the personal information of school governors so that we can operate effectively as a school, meet our legal obligations and support our governing board.

This privacy notice explains how we collect, store and use (i.e. process) your personal information, before, during and after your relationship with us as a governor. It also lets you know what rights you have in relation to our processing of your personal information.

If you would like to discuss anything in this privacy notice at any time, please contact:

School Lead:	Meg Wilson (Headteacher) admin@olol.org.uk 01454 867160
Data Protection Officer:	Nicola Cook, SchoolsDPO Ltd nicola@schoolsdpo.com 01296 658502

2. The categories of governance information we process includes:

- **Personal identifiers and contacts**, e.g. name, date of birth, contact details and address, photographs and CCTV images
- **Characteristics**, e.g. gender, any declared criminal convictions, skills and experience
- **Governance details**, e.g. start date, terms of office, role, pecuniary or business interests held by you or your family members
- **Information** derived from monitoring IT acceptable use standards
- **Recruitment information**, e.g. application, identity and right to work checks, copy of passport or similar photographic identification, references.

3. Why we collect and use governance information

We collect and use your personal information for the following purposes:

a. Manage and develop our governor recruitment (appointment and election) process
b. Support you in your governance role and meet your training and development needs
c. Fulfil our function as a school and deliver services to our community
d. Comply with our general safeguarding obligations
e. Meet our legal obligations in relation to school governance.

4. Collecting governance information

We collect your personal information through the governor application and recruitment process, either directly from individuals or sometimes from an external organisation such Governors for Schools, our Local Authority, our Diocese.

Whilst the majority of information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain governance information, or if you have a choice on this.

5. Storing governance information

Physical and electronic records are held for each governor. Information is held securely on our management information systems and on our school premises.

We hold your personal information in line with our retention schedule, a copy of which can be obtained from the school office.

6. Who we share governance information with

We routinely share governance information with:

- Our Local Authority to support it in meeting its statutory duties
- The Department for Education, e.g statutory data collections (see Appendix One for information on how the DfE uses your information)
- Our Disclosure and Barring Service (DBS) checks provider

We may have to share your personal information with:

- Third parties, e.g.our IT provider or HR provider (if you are involved in a staff disciplinary procedure, for example)
- The Police or other law enforcement agencies
- Our external auditors
- Our legal advisers/other external consultants.

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

When we share your personal information with third parties, we will always ensure that we share the minimum amount of information necessary for the purpose of the sharing. We will also require them to keep your personal information secure and to treat it in accordance with data protection law.

7. The lawful basis on which we use governance information

Our school, as a data controller, needs to comply with the UK's General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018. We are required to ensure we have a lawful basis under the GDPR for any processing we carry out on personal data.

Under Article 6 of the GDPR the lawful bases we rely on for processing school workforce information are:

- We need to comply with a **legal obligation**, e.g. DfE data returns
- We need to meet our **public task** of running our school and keeping everyone safe
- We have a **legitimate interest**
- We have obtained **consent** to use personal information in a certain way
- We need to protect someone's life (**vital interests)** in an emergency.

Our lawful bases under the GDPR for the purposes listed above in section 3 are as follows:

a. Manage and develop our governor recruitment (appointment and election) process - **public task**
b. Support you in your governance role and meet your training and development needs - **public task**
c. Fulfil our function as a school and deliver services to our community - **public task**
d. Comply with our general safeguarding obligations - legal obligation, **public task**
e. Meet our legal obligations in relation to school governance - **legal obligation**.

Some personal information requires extra protection because it is considered more sensitive. This includes race, ethnicity, religious beliefs, medical conditions, genetic information and biometric data.

Under Article 9 of the GDPR, if we are processing governors' special category data, we will also rely on one of the following lawful conditions:

- To meet our **obligations as a data controller, or those of data subjects**, in connection with employment, social security and social protection
- For reasons of **substantial public interest**, keeping our workforce safe and ensuring **equality of opportunity/treatment**
- To establish, exercise or defend **legal claims**
- To protect someone's life (**vital interests**) in an emergency
- We have **explicit consent.**

In addition, under the UK's Data Protection Act 2018, we rely on the processing conditions at Schedule 1, part 1, paragraphs 8 and 18.

These relate to the processing of special category data for safeguarding purposes and equality of opportunity/treatment. Our Appropriate Policy Document provides more information about this processing and can be found on our school website by clicking on the following link 38918173_page_file.pdf

8. The lawful basis of consent

Whenever we rely on consent, it must be freely given, informed and clear. Consent can be withdrawn at any time by contacting the school lead (details on the first page).

9. Criminal convictions and offences

We process information about any criminal convictions and offences under Article 10 of the GDPR because we are required by law to carry out enhanced DBS checks as part of our recruitment processes.

The GDPR Article 6 lawful bases we rely to process this data are:

- performance of our **public task**
- performance of a **contract**.

In addition, under the UK's Data Protection Act 2018, we rely on the processing conditions at Schedule 1:

- Part 2, para 6(2)(a)
- Part 1, para 1.

These relate to the processing of criminal offence data for statutory and employment purposes respectively. See Part 3 of *Keeping Children Safe in Education* for more information.

Our Appropriate Policy Document provides more information about this processing and can be found on our school website by clicking on the following link 38918173_page_file.pdf

10. Your Data Protection Rights

Under the GDPR you have the right to request access to the information about you that we process (a **subject access request)**. To make a request for your information please contact the school lead (details on the first page).

You also have the right to:

- Have your personal data corrected 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 the processing of your personal data (i.e. permitting its storage but no further processing)
- 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 upon you.

For more information on how we handle subject access requests, please see our Data Protection Policy, which can be accessed on our school website by clicking on the following link 38918174_page_file.pdf

11. How you can help us

As we have limited staff resources outside of term time, we encourage you to submit subject access requests during term time and not too close to the end of term. This will support us in responding as quickly as possible to your request, which we always want to do.

12. Any concerns

We take any concerns about our collection or use of personal information very seriously, so please contact us (details on first page) to raise any concerns in the first instance.

If you remain concerned, having done this, you have the right to raise your concerns with the Information Commissioner's Office and you can find more information about how to do this here.

13. Appendix One - Department for Education

(Information provided by the DFE)

Please see link below:-

Privacy notices: an explanation