



Federation of Kymbrook & Thurleigh Primary Schools

*Working in partnership with families to unlock the potential of every individual.
Together, we nurture a self-belief and a lifelong passion for learning.*

Governor Privacy Notice - Kymbrook

Enjoyment – Enrichment – Excellence – Equality

FGB Approval	December 2024
Review Date	December 2025

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Governor Privacy Notice

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

Data Controller	Kymbrook Primary School
	Kimbolton Road Keysoe Bedfordshire MK44 2HH

This Governor Privacy Notice is to let you know how we as an educational setting look after personal information about our governors. This is in relation to information you provide us and the information you enter on GovernorHub for your personal profile.

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 UK General Data Protection Regulations (UK GDPR).

A copy of this Privacy Notice is available on our [Kymbrook Primary School - GDPR](#). 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: Our Data Protection Lead (Schools Business Manager), Kymbrook Primary School, Kimbolton Road, Keysoe, Bedfordshire, MK44 2HH. Telephone 01234 376266 e-mail GDPR@ktfederation.co.uk

How we collect governor/trustee information

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

We obtain governor information through governor contact forms administered by the Clerk to the Governing Body and/or assimilate information from the data you enter onto GovernorHub.

We are also obliged to hold governor name information on our Single Central Record to confirm DBS checks have been undertaken.

We also collect any changes to your information throughout the year to keep our information about you as up-to-date as possible.

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 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.

Certain information about our governors is also entered manually onto the Department for Education (DfE) 'Get Information About Schools' (GIAS) website for our school by our School Business Manager.

The DfE holds this information under a combination of software and hardware controls which meet the current [government security policy framework](#).

For more information, please see the '[How Government uses your data](#)' section.

We collect and hold governor information which includes:

- Personal information (identifiers) such as name, address and postcode
- Secure school email address
- Governor start date, role and category
- Contact telephone number(s)
- Special category data such as ethnicity, disability and access requirements
- Business and personal pecuniary interests
- Record of skills
- An enhanced DBS check

In addition to the information we collect from governors, we also record and hold the following information:

- Governor training record
- Record of attendance at governing board meetings

Why we collect and use this information

The personal data collected is essential, in order for our school/academy to fulfil our official functions and meet legal requirements.

We collect and use governor information for the following purposes:

- To meet the statutory duties placed upon us (*see **Lawful bases below***)
- 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 on the school's website in the interests of openness and transparency
- Communicate between governors on GovernorHub and provide access to governor resources and documents securely 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

Lawful bases

Under the UK GDPR, the lawful bases we rely on for processing personal information to meet the statutory duties placed upon us is under a legal obligation in accordance with item c) **as described in Article 6, UK GDPR:**

- *c) processing is necessary for compliance with a legal obligation to which the controller is subject;*

We also acknowledge that some of the data items collected are deemed as **Special Category Personal Data** and that item g) *processing is necessary for reasons of substantial public interest* as described in **Article 9, UK GDPR**, is the condition under which our school collects and processes the following:

- ethnic origin data

- ~~biometric data for identification (where IT, security or catering system requires it)~~
- **Legislation**

The data collected is also in accordance with the functions of governance as outlined in the following:

- The School Governance (Roles, Procedures and Allowances) (England) (Amendment) Regulations 2013
- The School Governance (Constitution) (England) (Amendment) Regulations 2012
- The School Governance (Constitution and Federations) (England) (Amendment) Regulations 2014

Furthermore, as a local authority maintained school, governing bodies also have a legal duty to provide governance information to the Department for Education (DfE) and local authority as detailed above under [section 538 of the Education Act 1996](#)

To find out more about the requirements placed on us by the Department for Education (DfE) including the 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.

Data requested under consent

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 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 information with:

- Other governors/within the Federation
- Our Local Authority (either directly or through GovernorHub) 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 (i.e. GovernorHub) 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 (such as GovernorHub) we share data with comply with the UK GDPR through their Privacy Notices and/or Data Sharing Agreements.

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 governor with certain*

expertise to offer 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 and when new governors join the Governing Body.

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/trustees to access training opportunities and to enable governing board development.

How government uses your data

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

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 UK GDPR principles. 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 Management Procedure** 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 [Kymbrook Primary School - GDPR](#)

Requesting access to your personal data

Under the UK-GDPR data protection regulations, you have the following rights:

- Right to be informed about the collection and use of your personal data
- Right to access to your personal information – ask for copies of your personal information we hold by following the Subject Access Request process (*see below*)
- Right to have inaccurate or incomplete personal data rectified, blocked, erased or destroyed in certain circumstances
- Right to object to processing of personal data (or stop using your information) in certain circumstances
- Right to restrict processing for the purpose of direct marketing
- Right to data portability or sharing with other parties
- 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
- Right to complain to the Information Commissioner if you feel we have not used your information in the right way (*see Reporting concerns about our data protection processes below*)

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 as a school and safeguard the children in our care. There are legitimate reasons why we may refuse your information rights request depending on the reasons why we are processing it (e.g. right to erasure does not apply when the lawful basis for processing relates to a legal obligation and/or public task).

Subject Access Request (SAR) - You do have the right to request access to personal information about you that we hold. To request access to your personal information, you can make a **Subject Access Request (SAR)**.

For further information about this contact Our Data Protection Lead, Kymbrook Primary School, Kimbolton Road, Keysoe, Bedfordshire, MK44 2HH. Telephone 01234 376266 e-mail GDPR@ktfederation.co.uk

Our school will follow procedures outlined in our **Subject Access Request Policy** available from our website [Kymbrook Primary School - GDPR](#) 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 during school holidays as our post and school email is infrequently monitored. We will contact you to acknowledge receipt of your request at our first opportunity and will agree a date with you by which time we can provide the information requested. Additionally, if the nature of the request is complex, we will aim to reach a mutually agreed alternative time period.

If you want to see the personal data held about you by the Department for Education (DfE), you should make a subject access request (SAR) through DfE's process. Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

or

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

To contact DfE: <https://www.gov.uk/contact-dfe>

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 [Kymbrook Primary School - GDPR](#)

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

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 Our Data Protection Lead, Kymbrook Primary School, Kimbolton Road, Keysoe, Bedfordshire, MK44 2HH. Telephone 01234 376266 e-mail GDPR@ktfederation.co.uk 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 [Kymbrook Primary School - GDPR](#).

Important GDPR Definitions

- *Processing is any operation (including collection, recording, organising, storing, altering, using, and transmitting) performed on Personal Data.*
- *Personal Data is any information relating to a natural person (called a Data Subject) who can be (directly or indirectly) identified using that information.*
- *A Data Controller is a person, authority, agency or other body which determines the purposes and the means of Processing.*
- *A Data Processor is a person, authority, agency or other body which undertakes Processing on behalf of a Data Controller.*