



Cippenham Nursery School: Privacy Notice for Governors

Under data protection legislation, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing privacy notices (sometimes called fair processing notices) to individuals when we process their personal data.

This privacy notice explains how and why we collect, store and use personal data about Governors under the following legislation:

- UK General Data Protection Legislation (UK GDPR)
- Data Protection Act 2018 (DPA)
- The Data Use and Access Act 2025 (DUAA).

We, Cippenham Nursery School, are the 'Data Controller' for the purposes of data protection law. The School is registered as a Data Controller with the Information Commission (formerly the Information Commissioner's Office) (ICO). Our registration number is **Z8629609**.

Our Data Protection Officer is The Schools People (see 'Contact Details' below).

1. Data Protection Principles

Personal Data must be processed following the six Data Protection Principles. It must be

- Used lawfully, fairly and transparently.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

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2. Types of Information We Collect.

The categories of information that we collect, process, hold, and share include, but are not limited to:

- Contact details;
- Date of birth;
- Photographs;
- Information about business and pecuniary interests,
- Attendance at meetings
- CCTV Images

We may also process any information you have made public, e.g., on social media, where this information has been brought to our attention and is a potential cause for concern

We may also collect, store and use information about you that falls into “special categories” of more sensitive personal data. This may include information about (where applicable):

Race, ethnicity, religious or philosophical beliefs

Health, disability, and access requirements.

Safeguarding checks (e.g. DBS)

3. Collecting Governors' Personal Data

We collect the **Governors'** personal data from:

- Application Forms and the appointment process
- Directly from the individual
- Local Authority
- Activity throughout the term of the appointment
- CCTV cameras in and around the school site for security and the protection of staff, pupils and other stakeholders.

We may also hold data about governors that we have received from other organisations, including other schools, Local Authorities and the Department for Education.

While the majority of the information we collect about Governors is mandatory, some is provided voluntarily.

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Whenever we seek to collect information relating to Governors, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

If you fail to provide certain information when requested, the School will be prevented from complying with our legal obligations

4. Why we use Governors' information

We collect Governor information to safeguard and promote governor welfare, promote the objects and interests of the School, facilitate the efficient operation of the School, and ensure that all relevant legal obligations of the School are complied with. For example, we collect data for the following purposes:

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- establishing and maintaining effective governance
- deciding whether to appoint you as a Governor
- dealing with any processes for the election of Governors'
- checking your suitability to be a Governor
- facilitating safe recruitment, as part of our safeguarding obligations towards pupils
- to meet statutory obligations for publishing and sharing Governors' details
- communicating with stakeholders about the school
- business management, administrative and planning purposes, including accounting and auditing
- managing financial information such as expenses claimed
- responding to complaints or investigations from stakeholders or our regulators
- sending you communications connected with your role as a Governor
- making decisions about your continued appointment as a Governor
- making arrangements for the termination of your appointment
- identifying and arranging education, training and development requirements
- to carry out governance reviews
- dealing with legal disputes involving you or other stakeholders
- complying with health and safety obligations

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- keeping records relating to the Governors' decision-making processes, including copies of minutes, reports and other documentation
- maintaining and promoting equality
- receiving advice from external advisors and consultants
- ensuring that appropriate access arrangements can be provided for those who require them.
- liaising with regulatory bodies, the Department for Education, the DBS and the Local Authority about your suitability to be a Governor or in connection with other regulatory matters

5. Automated Decision Making

Automated decision-making takes place when an electronic system uses personal information to make decisions without human intervention. We are permitted to use automated decision-making in limited circumstances.

The School does not currently carry out any automated decision-making. If this position changes, we will notify you and implement appropriate safeguards, as required by law

6. The Lawful Bases on which we Process Personal Data

We process general personal data where:

- we have the consent of the data subject
- necessary for a contract we have with you or because it is necessary to take steps before entering into a contract with you
- necessary for us to comply with the law
- necessary to protect the vital interests of the data subject or another person
- necessary for us to perform a task in the public interest or for our official functions, and this task or function is lawful.

As a public authority, the School primarily relies on public task and legal obligation as its lawful bases. Where legitimate interests are relied upon, this will be assessed in line with statutory guidance and having regard to the School's public functions.

We process special category data where:

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- we have the explicit consent of the data subject
- necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent;
- the data are manifestly made public by the data subject and it is in our interest to do so;
- for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
- necessary for reasons of substantial public interest, based on domestic law
- necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

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

7. Information about Criminal Convictions

This information is not routinely collected and is only likely to be processed in specific circumstances. This will usually be where such processing is necessary to carry out our legal and safeguarding obligations, and is undertaken in line with data protection legislation.

We envisage that we will hold information about criminal convictions, for example, if such information comes to light as a result of our appointment and Disclosure and Barring Service checks, or such information is identified or disclosed during your time with us.

Where appropriate, the School may share information with external agencies, including the child protection team at the Local Authority, the Local Authority Designated Officer (LADO) and/or the Police.

Such information will only be processed to the extent that it is lawful to do so. Appropriate measures will be taken to keep the data secure.

8. Consent

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We may process personal information without your consent, in compliance with the above lawful bases, where this is required or permitted by law and our policies.

We will seek consent to process personal data where no other lawful basis exists. For example, if we wish to use your photos on the website to promote school activities, or use your personal data for marketing purposes.

In limited circumstances, we may require written consent to process certain particularly sensitive data. If we do so, we will provide full details of the information that we would like and the reason we need it, so that careful consideration may be given to whether you wish to consent.

Where we rely solely on consent as the lawful basis for processing, consent may be withdrawn at any time.

9. Change of Purpose

We will only use personal information for the purposes for which it was collected unless we reasonably consider that we need to use it for another reason, and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis that allows us to do so.

10. Storage and Retention of Personal Data

A significant amount of personal data is stored electronically. Some information may also be stored as a hard copy.

Data stored and accessed electronically is done so following the School's ***Data Security Policy***

Hard copy data is stored and accessed following the School's ***Data Security Policy***

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including to satisfy any legal, accounting, insurance or reporting requirements. Details of retention periods for different aspects of your personal information are available in our

Data Retention Policy.

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When your term as a Governor at the School comes to an end, we will retain your personal data and subsequently securely destroy it in line with our **Data Retention Policy**.

11. CCTV

We have installed CCTV systems on our premises for the safety of staff, pupils, governors and other stakeholders, and for the prevention and detection of crime. Signs are displayed notifying you that CCTV is in operation.

All CCTV images will be retained for 25 days. After this period, the images are permanently deleted unless they are required for an identified ongoing incident or investigation (for example, if a crime has been observed and recorded, or if the images have been retained while another subject access request is being processed). In such cases, images will be retained for as long as necessary (for example, until the conclusion of any criminal proceedings arising from the incident). For further information, please refer to the School **CCTV Policy**

12. Who do we share Governors' Personal Data with?

We do not share Governor information without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- Government departments or agencies - to meet our legal obligations to share information about Governors;
- The Local Authority - to meet our legal obligations to share certain information, such as details of Governors;
- Ofsted - for use as part of our school inspections;
- The general public, via the school website, to meet our legal obligation

Occasionally, we may also share Governors' information with other organisations, including:

- Law enforcement agencies;

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- Courts, if ordered to do so;
- Prevent teams under the Prevent Duty on Schools;
- Our legal advisors;
- Our insurance providers / the Risk Protection Arrangement.
- Slough Borough Council

We may also share limited personal data with third-party service providers, as necessary, to deliver contracted services that support Governors. Service providers include:

- HR
- Our legal advisors
- Our insurance providers
- Any other services/service providers that we will inform you of from time to time.

These third-party service providers act as data processors on the School's behalf and are required to take appropriate security measures to protect your personal information in line with our policies and data protection legislation. We authorise these service providers to use personal data only as necessary to perform services on our behalf, or to comply with legal obligations.

13. Transferring Data Outside The UK

We do not routinely transfer personal data outside the UK. Where international processing is necessary, we transfer personal data only in compliance with UK data protection law and only where appropriate safeguards are in place.

Safeguards may include:

- an adequacy decision under the UK GDPR; or
- approved contractual safeguards, such as the UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses; and
- a completed Transfer Risk Assessment (TRA).

In exceptional circumstances, where no adequacy decision or appropriate safeguards apply, we may rely on a limited UK GDPR derogation (for example, where the transfer is necessary for important reasons of public interest or to protect vital interests).

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14. Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have procedures in place to address any suspected data security breach and will notify you and any applicable regulator if required by law.

15. Your Data Subject Rights

You have the right to:

- Make a Subject Access Request (SAR) (see below)
- Withdraw consent to the processing at any time
- Ask us to rectify, erase or restrict the processing of your personal data, or object to the processing of it (in certain circumstances)
- Prevent the use of your personal data for direct marketing
- Challenge processing, which has been justified based on public interest
- Request a copy of agreements under which your personal data is transferred outside of the UK
- Object to decisions based solely on automated decision-making or profiling. The school **does not use** automated decision-making and/or profiling in any of its processes and procedures
- Prevent processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Make a complaint to the ICO
- Ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances)

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For more information about your data subject rights, please see [Individual rights - guidance and resources | ICO](#)

Your Duty to Inform us of Changes

The personal information we hold about you must be accurate and up to date. Please keep us informed if your personal information changes during your time with the School.

Subject Access Requests (SAR)

Under data protection legislation, individuals have the right to request access to their personal data held by the School. Subject Access Requests may be made to the School in written form or verbally. If you would like to make a SAR concerning your own personal data it would be helpful if this could be made in writing to the Headteacher, including your:

- name and contact address
- email address and telephone number
- details of the information required.

Clarification and “Stopping the Clock”

Where a Subject Access Request is unclear or requires further detail, the School may request clarification from the requester. During this clarification period, the statutory time limit for responding will be paused (“stopped”) until the required information is received.

For more information about making a SAR, please see [Getting copies of your information \(SAR\) | ICO](#)

Reasonable and Proportionate Searches

When responding to Subject Access Requests, the School will conduct reasonable and proportionate searches in accordance with the standards set out in the Data Use and Access Act 2025. Under this proportionality requirement, the School is not obliged to provide copies of information that the requester already possesses or can already access. The School will, however, acknowledge that such information is held and explain why it is not being re issued.

A Subject Access Request (SAR) form is available from the School office. It **is not** mandatory to make a Subject Access Request using the form. It will, however, assist you in structuring your SAR to provide the information we need to action your request without delay.

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We will respond within one month of receiving a valid Subject Access Request. Where a request is unclear or requires clarification, we may ask for further information and pause the response timeframe until we receive it.

A SAR is considered “valid” if we are fully satisfied with the requester's identity and their entitlement to the requested data. If in any doubt, we will request confirmation of identity to ensure personal data is not inadvertently released to a third party who is not entitled to it.

We will carry out reasonable and proportionate searches when responding to requests.

If the SAR is complex or numerous, the period in which we must respond may be extended by a further two months. You will be notified of any delays in actioning the SAR and provided with a timeframe in which you can expect to receive the requested data.

Exercising Other Data Subject Rights

If you wish to review, verify, correct or request the erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the school in the first instance (details below).

The Right to Withdraw Consent

Where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, and there is no other applicable lawful basis for processing the data, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Headteacher in writing(details below).

16. Data Protection Complaints

Under the Data (Use and Access) Act 2025, individuals now have the right to raise a data-protection complaint directly with the School before contacting the Information Commission (ICO). A formal complaints process must be in place by 19 June 2026. In the meantime, if you wish to raise a concern about the handling of your personal data, you may contact the School directly, clearly stating the nature of the complaint and the desired resolution. For more information, please see here: [How to make a data protection complaint to an organisation | ICO](#)

If you remain dissatisfied following the School's response, you have the right to raise your concern with the Information Commission: <https://ico.org.uk/make-a-complaint/>

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17 Contact Details

Data Controller: Cippenham Nursery School, St Andrew Way, Slough SL1 5NL

Data Controller's Representative: Nisha Gill, Headteacher. Email:

head@cns.slough.sch.uk

Data Protection Officer (DPO): The Schools People. Dee Whitmore. Email:

dposervice@schoolspeople.co.uk

18. Changes to this Privacy Notice

This Privacy Notice will be reviewed annually or as necessary in response to changes in Data Protection legislation or in our processing activities.

We reserve the right to update this privacy notice at any time and will provide you with a new privacy notice if we make any substantial updates.

We may also notify you from time to time in other ways about the processing of your personal information.

Effective Date: May 2018

Last update: April 2026

Review Date: April 2027

How the Government uses your data

The governance data that we lawfully share with the DfE via GIAS:

- will increase the transparency of governance arrangements
- will enable maintained schools and academy trusts 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

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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 publicly 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.

How to find out what personal information DfE hold about you

Under the terms of the Data Protection Act 2018, you're entitled to ask the Department:

- if they are processing your personal data;
- for a description of the data, they hold about you;
- the reasons they're holding it and any recipient it may be disclosed to;
- for a copy of your personal data and any details of its source.

If you want to see the personal data held about you by the Department, you should make a 'Subject

Access Request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:

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

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