



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 where we are processing their personal data.

This privacy notice explains how and why we collect, store and use personal data about Governors.

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 Commissioner's Office (ICO). Our registration number is **Z8629609**.

Our data protection officer is The Schools People (see 'Contact us' 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.

2. Types of Governor Information We Collect.

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

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- 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 Governor Personal Data

We collect Governor's personal data from:

- Governor Application Forms and the appointment process
- Directly from the individual
- Local Authority
- Governor activity throughout the term of the appointment

In addition, the school also uses CCTV cameras in and around the school site for security purposes and for the protection of staff, pupils and other stakeholders.

Whilst the majority of Governor information provided to us is mandatory, some of it is provided to us voluntarily. To comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain information; if you have a choice in this and what the possible consequences of failing to provide this personal data would be.

4. Why we collect and use Governor Information

We collect and use Governor's personal data to support the school in:

- 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 Governor 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
- keeping records relating to the Governor's 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.

We **do not** envisage that any decisions will be taken about Governors using automated means. However, we will notify you in writing if this position changes.

6. The Lawful Bases on which we Process Personal Data

We process general personal data under:

- Article 6 (1)(a) of the GDPR. Where we have the consent of the data subject;
- Article 6 (1)(b) of the GDPR: Processing is necessary for a contract we have with you, or because it is necessary to take steps before entering into a contract with you
- Article 6(1)(c) of the GDPR. Processing is necessary for us to comply with the law;
- Article 6(1)(d) of the GDPR. Processing is necessary to protect the vital interests of the data subject or another person;
- Article 6(1)(e) of the GDPR: Processing is necessary for us to perform a task in the public interest or for our official functions, and this task or function is lawful

We process special category data under:

- Article 9(2)(a) of the GDPR. The data subject has given explicit consent or a person with the lawful authority to exercise consent on the data subject's behalf;
- Article 9(2)(c) of the GDPR. Processing is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent;
- Article 9(2)(e) of the GDPR. The processing relates to personal data which are manifestly made public by the data subject;
- Article 9(2)(f) of the GDPR. Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;

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- Article 9(2)(g) of the GDPR. Processing is necessary for reasons of substantial public interest, based on domestic law
- Article 9(2)(j) of the GDPR. Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

7. Information about Criminal Convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations, and provided we do so in line with data protection legislation.

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

8. Consent

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.

Where appropriate, we will ask for consent to process personal data where there is no other lawful basis for processing it, for example where we wish to use photos or images of Governors on our website to promote school activities, or if we want to ask your permission to use your information for marketing purposes.

In limited circumstances, we may require written consent to allow us 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 personal information for an unrelated purpose, we will notify you and we will explain the legal basis which 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 we collected it for, 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**.

When your term as a Governor at the School comes to an end, we will retain and securely destroy your personal information following 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.

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All CCTV images will be retained for 25 days. After this period the images are permanently deleted unless they are required for an ongoing incident/investigation which has been identified (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;
- 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

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We may also share limited personal data with third-party service providers who require access to data to perform contracted services for Governor support;

These 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 if necessary.

13. Transferring Data Outside The UK

We do not routinely share data with organisations outside the UK

We will not transfer personal data outside the UK unless such transfer complies with the GDPR.

This means that we cannot transfer any personal data outside the UK unless:

- The Secretary of State has decided that another country or international organisation ensures an adequate level of protection for personal data
- One of the derogations in the GDPR applies (including if an individual explicitly consents to the proposed transfer).

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.

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We have in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

15. Your Data Subject Rights

Governors 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)

For more information about your data subject rights please see [here](#).

Your Duty to Inform us of Changes

The personal information we hold about Governors must be accurate and current. Please keep us informed if your personal information changes during your time as a Governor at the School.

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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.

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 necessary to ensure we can action your request without delay.

We must respond within one month of receiving a valid Subject Access Request. A SAR is only considered “valid” if we are fully satisfied regarding the identity of the requester and their entitlement to the data requested. If in any doubt we will request confirmation of identity to ensure your personal data is not inadvertently released to a third party who is not entitled to it.

If the SAR is complex or numerous the period in which we must respond can 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.

16. How to Contact Us

If you have any questions or concerns about how we process information or wish to exercise any data protection rights, please contact the school in the first instance.

If you have concerns that we are not able to resolve to your satisfaction you can contact our Data Protection Officer at the email address below.

Alternatively, you can register a concern with the UK’s data protection regulator - the Information Commissioner’s Office, by following this link <https://ico.org.uk/make-a-complaint/>

Contact Details

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

Data Controller's Representative: Nisha Gill, Headteacher.

Email: head@CNS.slough.sch.uk

Data Protection Officer: Dee Whitmore. The Schools People

Email: DPOService@Schoolspeople.co.uk

17. Changes to this Privacy Notice

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

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

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

Effective Date:	May 2018
Last update:	February 2025
Review Date:	March 2026

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>