# Privacy Notice for Governors & Volunteers
# How we use your information

# 2025/2026

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**Who are we?**
Radford Semele C of E Primary School is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Radford Semele C of E Primary School is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: **ZA 365273**

You can contact the school as the Data Controller in writing at:

Radford Semele C of E Primary
School Lane
Radford Semele
Leamington Spa
CV31 1TQ

or admin3152@welearn365.com

**What is a Privacy Notice?**
A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our staff.

**What is Personal Information?**
Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

**What personal information do we process about Governors?**
The categories of governor and volunteer information that we collect, hold and share include:

- personal information such as name, any former names, address, date of birth, nationality, telephone and email contact details;
- records of business and pecuniary interests;

- Disclosure and Barring Service Certificate number and start date;
- Information from references;
- self assessment skills audit;
- evidence of any relevant qualifications;
- personal profiles provided for school website;
- photographs
- governance details, for example, role, start and end dates of role.

We may also collect, use, store and share (when appropriate) information that falls into "special categories" of more sensitive personal data. This includes:

- information about any health conditions you have that we need to be aware of;
- information about disability and access requirements;
- information relating to criminal convictions and offences;
- photographs and video footage captured in school.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

**For what purposes do we use personal information?**
The personal data the school collects and processes about governors and volunteers is essential in order for the school to fulfil their official functions and meet their legal responsibilities.

We use governor and volunteer data to:

- establish good governance;
- fulfill statutory obligations placed on the school;
- facilitate safe recruitment, as part of our safeguarding obligations;
- undertake equalities monitoring;
- communicate relevant information to individuals, other members of the Governing Body or volunteers or the Governing Body as a whole for the purpose of Governors carrying out their roles and responsibilities as a Governor;
- ensure that appropriate access arrangements can be provided ot governors and volunteers who require them.

**Use of your personal data for marketing purposes**
Where you have given us consent to do so, we may send you marketing information by email, text, or other communication means used in school, promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw your consent or 'opt out' of receiving such communications at any time by contacting the school or by clicking the unsubscribe link on any such communications.

**Use of your personal data in automated decision making and profiling**
We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you.

**Collecting Governor information**
We collect information during the Governor appointment process and during the term of governorship as

appropriate.

Whilst most of the data we hold about governors and volunteers will come directly from the individual, we may also collect information about you from:

- local authorities;
- government departments or agencies;
- police forces, courts, tribunals.

Whilst the majority of Governor information provided to us by Governors is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain Governor information to us or if you have a choice in this.

**What are the legal reasons for us to process your personal information?**
We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. Data Protection law sets out the lawful reasons we have to process your personal information and these are as follows:

**1) To comply with the law**

We collect and use general purpose staff information in order to meet certain legal requirements and legal obligations placed upon the school by UK law. We therefore have the right to process your personal information for such purposes without the need to obtain your consent.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

**2) To protect someone's vital interests**

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

**3) With the consent of the individual to whom that information 'belongs'**

Whilst much of the personal information is processed in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

**4) To perform a public task**

It is a day-to-day function of the school to ensure that Governors receive the training and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that Local Governing Bodies are properly supported and able to fulfil their role and responsibilities.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

**Special category personal information**

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In additional to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

1) Explicit consent of the data subject;
2) Necessary for carrying out obligations and exercising specific rights in relation to employment and social security and social protection law;
3) Vital interests;
4) Processing relates to personal data which is manifestly made public by the data subject;
5) Necessary for establishing, exercising or defending legal claims;
6) Necessary for reasons of substantial public interest, with a basis in law;
7) Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health, with a basis in law;
8) Necessary for archiving, historical research or statistical purposes, with a basis in law.

The lawful reasons for each type of sensitive category personal information that we process is set out in the tables attached.

For criminal offence data, we will only collect and use personal data when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection legislation. Conditions include:

- we have obtained your consent to use it in a specific way;
- we need to protect an individual's vital interests (for example, protect your life or someone else's life), in situations where you are physically or legally incapable of giving consent;
- the data concerned has already been made manifestly public;
- we need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights;
- we need to process it for reasons of substantial public interest as defined in legislation.

**Who might we share your information with?**
We routinely share Governor and volunteer information with:

- local authorities;
- government departments and agencies;
- companies house;
- the Department for Education (DfE);
- other governors or the Full Governing Body;
- OfSTED;
- suppliers and service providers;
- auditors;
- health authorities;
- security organisations;
- professional advisors and consultants;
- charities and voluntary organisations;
- law enforcement officials, for example, the police, courts, tribunals.

We do not share information about our Governors or volunteers unless the law and our policies allow us to

do so.

Please refer to the tables for information about what personal information is shared with which specific third parties.

**What do we do with your information?**
All personal information is held securely in a manner which is compliant with Data Protection legislation. Personal information is only processed for the purpose it was collected. The school monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

**How long do we keep your information for?**
In retaining personal information, the school complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the school are required to retain the information

A copy of those schedules can be located using the following link:
http://irms.org.uk/page/SchoolsToolkit

**Transferring data internationally**
We do not transfer data outside the European Economic Area (EEA).

**How Government uses governor data**
The data that the school lawfully shares with the DfE via GIAS will:

- Increase the transparency of governance arrangements;
- Enable Local Authority maintained schools and the DfE to identify more quickly and accurately individuals who are involved in governance and who govern in more than one context;
- Allow the 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.

To find out more about the requirements placed on school by the 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 DfE and education establishment users with a DfE sign-in 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 DfE unless the law allows it.

Under the Data Protection Act 2018, governors are entitled to ask the DfE:

- If they are processing personal data;
- For a description of the personal data they hold;
- The reasons they are holding the data and any recipient it may be disclosed to;
- For a copy of the personal data and any details of its source.

If a governor would like to see the personal data held about them by the DfE, they should make a Subject Access Request. Further information about how to do this can be found within the DfE's personal information charter that is published at the link below:

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

The DfE can be contacted at: https://www.gov.uk/contact-dfe

**What are your rights with respect of your personal information?**
Under data protection law, Governors have the right to request access to information about them that we hold. To make a request for your personal information contact the School Data Protection Officer at Warwickshire Legal Services via email at schooldpo@warwickshire.gov.uk or alternatively;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

****Please ensure you specify which school your request relates to**.

You also have the right to:

- restrict our processing of personal data, for example, permitting its storage, but no further processing;
- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed;
- claim compensation for damages caused by a breach of the Data Protection regulations; and
- subject to the complaints procedure below, you have the right to complain to the ICO.

**Data protection complaints**
We are committed to handling your personal data in a way that is fair, transparent and in accordance with the law. If you are unhappy with how we have handled your personal data, this process outlines how you can make a complaint.

**How to make a complaint**
If you have a complaint about how your personal data has been handled, please contact our Data Protection Lead or our Data Protection Officer. This allows us to investigate and resolve the issue as quickly as possible. They can be contacted at the email addresses detailed below:

- Data Protection Lead - admin3152@welearn365.com
- Data Protection Officer – schooldpo@warwickshire.gov.uk

When you contact us, please provide us with as much information as possible about your complaint. This will help us to understand the issue and investigate it thoroughly.

**What to expect from us**
We will acknowledge receipt of your complaint within 30 days. We will, without undue delay, take appropriate steps to respond to your complaint, including making appropriate enquiries:

Throughout the process, we will:

- keep you informed of our progress;
- request any additional information we may need from you in a timely and proportionate manner;
- provide you with a clear and comprehensive outcome of our investigation.

**If you remain unhappy**
If you are not satisfied with the outcome of your complaint, or if you feel it has not been handled appropriately, you have the right to complain to the Information Commissioner's Office (ICO). The ICO is the UK's independent regulator for data protection and information rights.

For more information about the ICO and their complaints process, you can visit their website at www.ico.org.uk.

**Contact**
If any member of staff would like to discuss anything contained in this Privacy Notice for Staff, please email admin3152@welearn365.com.

**Review**
The content of this Privacy Notice will be reviewed in September 2027.

**Table 1** – Personal information we are required to process to comply with the law:

| Information Type | Relevant legislation | Special Category– additional lawful reason | Third Parties with whom we share the information | Lawful reason for sharing |
|---|---|---|---|---|
| Name | Companies Act 2006 & Academies Act 2010 | | Companies House DfE | Statutory Requirement |
| Address | Companies Act 2006 & Academies Act 2010 | | Companies House DfE | Statutory Requirement |
| Date of Birth | Companies Act 2006 & Academies Act 2010 | | Companies House DfE | Statutory Requirement |
| Nationality | Companies Act 2006 & Academies Act 2010 | | Companies House DfE | Statutory Requirement |
| Occupation | Companies Act 2006 | | Companies House | Statutory Requirement |
| Register of School Governor's Business Interests – including governance roles in any other educational institutions. | School and Early Years Finance (England) (No. 2) Regulations 2018, Paragraph 15 to Schedule 5 | Local Authority | Statutory Requirement | |
| DBS Number | School Governance (Constitution) (England) Regulations 2012, Regulation 16Ahttps://uk.practicallaw.thomsonreuters.com/Document/I126D33F0DD1011E598C9F5A726309629/View/FullText.html?originationContext=document&transitionType=DocumentItem&contextData=%28sc.DocLink%29&navId=D7CAC11FA697BAD54A67570FD78BAEA1&comp=wluk | Local Authority | Public Task | |

**Table 2** – Personal information we are required to process as it is necessary to protect someone's vital interests

| Information Type | Special Category - additional lawful reason | Third Parties with whom we share the information | Lawful reason for sharing |
|---|---|---|---|
| Medical Information | Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent' | Medical staff i.e. paramedics / ambulance | Vital Interest |
| Religious Belief | Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent' | Medical staff i.e. paramedics / ambulance | Vital Interest |

**Table 3 -** Personal information we are required to process with the consent of the individual to whom that information 'belongs'

| Information Type | Special Category - additional lawful reason | Third Parties with whom we share the information | Lawful reason for sharing |
|---|---|---|---|
| Personal Profile | Published on school website | Consent of individual | |
| Photograph | Photo could be shared in the school newsletter, on the school website, with trusted media outlets. | Consent of individual | |
| Postcode | DfE | Legal Obligation - s.538, Education Act 1996 | |
| Date of birth | DfE | Legal Obligation - s.538, Education Act 1996 | |
| Previous Names | DfE | Legal Obligation - s.538, Education Act 1996 | |
| Phone Number | | Consent of individual | |
| Skills Audit | | Consent of individual | |

**Table 4 -** Personal information we are required to process because it is necessary to do so in order to perform a public task

| Information Type | Third Parties with whom we share the information | Lawful reason for sharing |
|---|---|---|
| Full Name – including title. | Local Authority and other Governing Body Members Published on website | Public Task (to comply with statutory guidance) |
| | DfE | Legal Obligation - s.538, Education Act 1996 |
| Email Address | Other governors and members of staff. | Public Task (to establish email address on secure server) |
| Date of Appointment | Published on website | Public task (to comply with statutory guidance) |
| | DfE | Legal Obligation - s.538, Education Act 1996 |
| Term of Office | Published on website | Public task (to comply with statutory guidance) |
| | DfE | Legal Obligation - s.538, Education Act 1996 |

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|---|---|---|
| Record of Material Interests that Arise from Relationships Between Governors and Relationships Between Governors and School staff; e.g. spouses, partners, close relatives. | Published on website | |
| Attendance at Meetings | Published on website | Public Task (to comply with statutory guidance) |
| Skills Audit | School governing body<br>Members of staff | Public Task (to comply with statutory guidance) |