

Last reviewed on:	20/03/2025
Next review due by:	19/03/2026

Privacy Notice for Governance Roles

Grace Owen Nursery School is the data controller for Governance information.

The categories of Governance information that we process include:

- Personal identifiers, contacts and characteristics e.g. name, date of birth, image, occupation, nationality and contact details e.g. address, telephone number, email address
- Governance details e.g. governance role, term of office, business and pecuniary interests and any training undertaken
- Attendance information e.g. meetings attended and any apologies received.
- Details of pre-appointment checks e.g. Section 128, DBS clearance
- CCTV footage

Please note this list is not exhaustive, however, all categories of information stored within school are stored in our data asset register.

Why we collect and use Governance information

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

We collect and use Governance information, for the following purposes:

- a) to meet the statutory duties placed upon us
- b) provide a comprehensive picture of governance within the School, its management and development
- c) to satisfy requirements of the Single Central Record

Grace Owen Nursery School collects and uses governance information under the following articles of the General Data Protection Regulation (GDPR).

Article 6:

Processing shall be lawful only if and to the extent that at least one of the following applies:

6 (1) a. The data subject has given consent to the processing of his or her personal data for one or more specific purposes;

6 (1) e. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller.

Article 9:

With regards to the processing of special category personal data e.g. racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health and sex life or sexual orientation shall be prohibited except:

9 (2) a. Where we have explicit consent of the data subject.

Under the GDPR, consent is defined as: “any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative actions, signifies agreement to the processing of personal data relating to him or her.”

All maintained school governing bodies, under section 538 of the Education Act 1996 and academy Schools, under the Academies Financial Handbook have a legal duty to provide the governance information as detailed above.

Collecting governance information

Governance role data is essential for the school’s operational use. 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 the 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.

Storing governance information

We hold data securely for the length of time indicated by records retention guidance. Governance role personal information files will be kept for 6 years after termination of their service.

Who we share governance information with

We routinely share governance information with:

- the Department for Education (DfE)
- the Local Authority (where applicable)

Why we share governance information

We do not share information about governance roles with anyone without consent unless the law and our policies allow us to do so. We are required, by law, to pass on some personal data.

We share personal data with Sheffield City Council on a statutory basis to underpin school governor policy monitoring, evaluation and administration.

Local authority

We are required to share information about our governors with our local authority (LA) under section 538 of the Education Act 1996

Department for Education

The Department for Education (DfE) collects personal data from educational settings and local authorities. We are required to share information about governance roles with the Department for Education (DfE), under the requirements set out under section 538 of the Education Act 1996.

All data is entered manually on the Get Information About Schools (GIAS) system and held by DfE under a combination of software and hardware controls which meet the current government security policy framework.

For more information, please see 'How Government uses your data' section.

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. This is called a 'Subject Access Request (SAR)'. To make a request for your personal information, please contact the Data Protection Officer.

Under certain circumstances, you also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of your personal information we have about you – this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to [complain to the Information Commissioner](#) if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent.

Subject Access Requests

Upon receipt of a Subject Access Request, Grace Owen Nursery School will:

- respond to acknowledge receipt of your request;
- request proof of identify of the person making the request;
- inform you as to whether there are any statutory reasons why we may be unable to respond to your request;
- act in accordance with the GDPR in terms of our actions in response to your request, and with due regard to the timescales set out in the GDPR.

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the [How Government uses your data](#) section of this notice.

Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the Data Protection Officer

Contact

If you would like to discuss anything in this privacy notice, please contact the Data Protection Officer.

How Government uses your data

The governance data that we lawfully share with the DfE via Get Information About Schools (GIAS):

- will increase the transparency of governance arrangements
- will enable schools 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

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 the Department for Education (DfE) hold about you

Under the terms of the [Data Protection Act 2018](#), you're entitled to ask the Department for Education (DfE):

- 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 for Education (DfE), you should make a subject access request (SAR). 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>