

St Cuthbert Mayne School



Governor Privacy Notice

Last reviewed: 15.10.26

Next review date: 14.10.27

1. Introduction

St Cuthbert Mayne School is committed to protecting the privacy and security of the personal information we hold about our governors and other individuals involved in the governance of the school.

This privacy notice explains how we collect, use, store and share personal information about members of the governing body, including governors, the Chair and Vice Chair, committee members and other individuals undertaking governance responsibilities on behalf of the school.

It also applies, where relevant, to associate members, individuals appointed to governance committees and prospective governors.

The school processes personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable legislation.

This notice explains:

- What personal information we collect and hold.
- Why we collect and use your information.
- The lawful bases on which we process your information.
- Who we may share your information with.
- How we store and protect your information.
- How long we retain your information.
- Your rights in relation to your personal information and how to exercise them.

This notice does not form part of any contract or formal appointment arrangements. We may update it from time to time to reflect changes in legislation, guidance or our data processing arrangements.

2. Who is responsible for your personal information?

St Cuthbert Mayne School is the data controller for the personal information it processes about governors, unless responsibility for a particular processing activity rests with another organisation.

As data controller, the school determines why and how personal information is processed and is responsible for ensuring that processing complies with data protection legislation.

In carrying out our governance responsibilities, we may work with Devon County Council and other organisations that provide governance support, training, administrative and other services. The precise responsibilities of each organisation depend on the service being provided and the relevant contractual and data protection arrangements.

Contact

You can contact the Data Protection Link Officer at the school, if you have questions about how the school uses your personal information or if you wish to raise a concern about data protection. The school outsources its Data Protection Officer service to Devon County Council.

Data Protection Link Officer	Data Protection Officer
Matt Burrell St. Cuthbert Mayne Trumlands Road Torquay Devon TQ1 4RN Email: gdpr@stcm.school	Jenny Goodall School Data Protection Team Devon County Council Topsham Road Exeter EX2 4QD Email: jenny.goodall@devon.gov.uk

3. What personal information do we collect?

The personal information we collect and hold will depend on your role, your responsibilities and the circumstances in which you undertake governance activities.

It may include the following categories.

Personal and contact information

- Full name and title.
- Home address and contact details.
- Telephone numbers and email addresses.
- Date of birth, where required for identification or other legitimate governance purposes.
- Preferred contact details and communication preferences.
- Emergency contact details, where necessary and appropriate.
- Facial photograph for identification purposes, badges etc.

Appointment and governance information

- Details of your appointment or election to the governing body.
- Your governor category and term of office.
- Appointment, election, reappointment and resignation dates.
- Details of the committee or committees on which you serve.
- Records of governance responsibilities and delegated roles.
- Information about your eligibility to serve as a governor.
- Records of governor induction and training.
- Information relating to your governance experience, skills and areas of expertise.
- Records of attendance at governing body and committee meetings.
- Records of governance performance reviews or skills audits, where undertaken.
- Relevant correspondence concerning your appointment or governance responsibilities.

Declarations of interest and financial information

We collect and maintain information necessary to manage conflicts of interest and meet governance transparency requirements. This may include:

- Business and financial interests.
- Employment, professional and other relevant interests.
- Governance roles held at other organisations.
- Relevant relationships with school staff, pupils, other governors or individuals connected with the school.
- Interests involving organisations that provide goods or services to the school.
- Declarations relating to specific agenda items or decisions.
- Records of how actual or potential conflicts of interest have been managed.

Some declarations may be published in accordance with applicable governance requirements and the school's publication arrangements.

Meeting and decision making information

We process information relating to the work of the governing body and its committees, including:

- Meeting invitations, agendas and supporting papers.
- Minutes and records of decisions.
- Attendance records.
- Written reports, correspondence and submissions.
- Records of questions, challenge and discussion where included in formal minutes.
- Records of agreed actions and follow up.
- Information relating to governance reviews, school improvement and strategic planning.
- Correspondence concerning governance matters.

These records may contain personal information about governors and, where necessary, other individuals involved in matters considered by the governing body.

Training and professional development

We may hold information about:

- Governance induction and training completed.
- Attendance at training sessions and development events.
- Training certificates and qualifications relevant to governance.
- Skills audits and governance development plans.
- Relevant professional experience and areas of expertise.

Safeguarding and suitability information

Where required by law or relevant to your appointment and responsibilities, we may process information concerning:

- Identity verification.
- Eligibility to serve as a governor.
- Disclosure and Barring Service (DBS) checks, where applicable.
- Disqualification criteria and other relevant declarations.
- Information required to assess suitability for governance responsibilities.
- Relevant safeguarding concerns or investigations, where necessary and lawful.

Criminal offence information and safeguarding records are subject to specific legal requirements and access restrictions.

The checks required will depend on the nature of the appointment and the legal requirements applicable to the role. We will not collect safeguarding or criminal offence information indiscriminately.

Communications and information technology

We may process information generated through your governance activities, including:

- Emails and other correspondence with the school.
- Communications with the governing body, committees and school leadership.
- Records of enquiries, requests and responses.
- Access to governance systems and electronic document platforms.
- Information relating to the use of school provided accounts, equipment or systems.
- Security records where necessary to protect school information and systems.

Complaints, investigations and legal matters

Where necessary, we may process information relating to:

- Complaints concerning governance or the conduct of governors.
- Grievances, allegations or investigations involving governance responsibilities.
- Disputes or legal proceedings.
- Requests for information under applicable information rights legislation.
- Correspondence with legal advisers, regulators or other relevant authorities.

We will restrict access to this information where appropriate, particularly where it is confidential or contains sensitive personal information.

4. Where do we obtain your personal information?

We collect personal information from a variety of sources, including:

- Directly from you, including information provided during appointment, induction and your term of office.
- Nomination, application and appointment documentation.
- Declarations of interest and other governance declarations.
- Correspondence and communications with the school.
- Meeting attendance records, minutes and governance documentation.
- Training providers and organisations supporting governance development.
- Devon County Council and other organisations providing governance support.
- The Disclosure and Barring Service or other relevant checking organisations, where appropriate and lawful.
- Information published by organisations with which you hold relevant governance or professional roles.
- Other governors, school leaders or members of the school community, where information is necessary for a legitimate governance purpose.
- Publicly available information where relevant and lawful.

Where we obtain personal information from another source, we will provide any additional privacy information required by data protection legislation.

5. Why do we use your personal information?

We process personal information to enable the governing body to carry out its responsibilities effectively and to meet the school's legal, regulatory and governance obligations.

Our purposes include the following.

Appointment and administration

We use personal information to:

- Manage governor nominations, appointments and elections.
- Verify eligibility and maintain accurate governance records.
- Record terms of office, governor categories and committee memberships.
- Maintain contact details and communicate with governors.
- Provide induction and information about governance responsibilities.
- Manage resignations, vacancies and changes to governance arrangements.

Governance and decision making

We use personal information to:

- Organise governing body and committee meetings.
- Prepare agendas and distribute meeting papers.
- Record attendance, decisions and agreed actions.

- Support effective scrutiny, challenge and strategic decision making.
- Monitor progress against agreed actions and priorities.
- Maintain an accurate record of the work of the governing body.
- Support governance reviews, self evaluation and improvement planning.

Declarations of interest and accountability

We use personal information to:

- Maintain declarations of interest.
- Identify and manage actual, potential or perceived conflicts of interest.
- Meet applicable governance and transparency requirements.
- Support appropriate decision making and public accountability.
- Publish information where required by law or applicable governance arrangements.

Safeguarding and suitability

We use relevant personal information to:

- Complete checks required for governor appointments.
- Meet applicable safeguarding and legal requirements.
- Assess eligibility and suitability for governance responsibilities.
- Respond to relevant safeguarding concerns.
- Comply with legal obligations relating to disqualification and conduct.

Training and development

We use personal information to:

- Arrange induction and governance training.
- Maintain records of training and development.
- Identify governance skills and development needs.
- Support the effectiveness and ongoing improvement of the governing body.

Communication and collaboration

We use personal information to:

- Communicate with governors about meetings, decisions and school matters.
- Share relevant reports and governance documentation.
- Liaise with school leaders, the local authority and governance support providers.
- Respond to queries and requests.
- Support the effective operation of the governing body and its committees.

Legal and regulatory responsibilities

We use personal information to:

- Meet statutory governance and safeguarding obligations.

- Respond to lawful requests from public authorities and regulators.
- Comply with applicable information rights legislation.
- Manage complaints, investigations, disputes and legal claims.
- Maintain records necessary to demonstrate accountability and compliance.

We will only use personal information for purposes that are lawful and compatible with the reasons for which it was collected, unless we have a valid legal basis for further processing.

6. What is our lawful basis for processing your information?

Data protection legislation requires us to have a lawful basis for processing personal information. The appropriate basis depends on the information involved and the purpose for which it is used.

The lawful bases most likely to apply to governor information are set out below.

Legal obligation

We process personal information where necessary to comply with legal obligations, including requirements relating to:

- The constitution and operation of the governing body.
- Governor appointments, eligibility and disqualification.
- Declarations of interest and governance transparency.
- Safeguarding and other applicable legal requirements.
- Publication of information required by law.
- Information rights and statutory reporting.

Public task

Where applicable, we process personal information where necessary to perform a task carried out in the public interest or in the exercise of official authority vested in the school.

This may include processing necessary for the governing body's statutory functions, strategic oversight and accountability responsibilities.

The use of this basis will depend on the particular activity and the legal function being performed.

Legitimate interests

In some circumstances, we may process personal information where necessary for our legitimate interests or those of a third party, provided that these interests are not overridden by your rights and freedoms.

This may include certain administrative activities, communication arrangements or governance support activities where another lawful basis is not more appropriate.

Where we rely on legitimate interests, we will consider whether the processing is necessary and proportionate and whether your interests or fundamental rights require greater protection.

Contract

A contract is unlikely to be the principal lawful basis for most governance activities. However, it may apply to particular arrangements where processing is necessary to take steps at your request before entering into a contract or to perform a contract with you.

Vital interests

In limited circumstances, we may process personal information where necessary to protect your vital interests or those of another person, particularly in an emergency involving a risk to life or serious harm.

Consent

In certain circumstances, we may ask for your consent to use personal information for a specific purpose.

Where we rely on consent, it must be freely given, specific, informed and capable of being withdrawn. We will not rely on consent where it is not an appropriate lawful basis.

Withdrawing consent will not affect the lawfulness of processing carried out before withdrawal. We may also continue to process information where another lawful basis applies.

Special category personal information

Some information, including health information, ethnic origin, religious beliefs and certain other sensitive information, is classified as special category personal data.

If we need to process special category information about a governor, we must have both a lawful basis under Article 6 of the UK GDPR and an applicable condition under Article 9 and, where required, the Data Protection Act 2018.

Depending on the circumstances, these may include substantial public interest, the establishment, exercise or defence of legal claims, or the protection of vital interests.

We will only process special category information where the relevant legal requirements are met.

Criminal offence information

Where we process information about criminal convictions, offences or related suitability checks, we must have an appropriate lawful basis and meet the additional requirements of data protection legislation.

Where required, we will maintain an appropriate policy document explaining how relevant special category and criminal offence information is handled and retained.

7. Who do we share your personal information with?

We only share personal information where there is a lawful and appropriate reason to do so. We will share only the information necessary for the relevant purpose and will take appropriate steps to protect it.

Depending on the circumstances, recipients may include:

- Devon County Council, including relevant governance support services.
- The Department for Education and other relevant education bodies.
- The Disclosure and Barring Service and other organisations involved in required suitability checks.
- Governance training providers and professional development organisations.
- External auditors, inspectors and regulators.
- Legal advisers and other professional advisers.
- Information technology providers and other organisations contracted to support school governance.
- Other governing bodies or educational establishments where information sharing is necessary and lawful.
- Courts, tribunals and other public authorities where disclosure is required or authorised by law.
- Members of the public, where information must be published or disclosed under applicable governance, transparency or information rights requirements.

We may also share information with other parties where necessary to protect individuals, investigate suspected wrongdoing, manage legal claims or meet our statutory responsibilities.

Publication of governor information

Certain information about governors may be published on the school website or made available to the public where required by law or applicable governance requirements.

This may include names, facial image, governor categories, terms of office, committee memberships, attendance information and relevant declarations of interest.

We will only publish personal information where there is an appropriate legal basis or other lawful justification for doing so. We will take account of applicable requirements and any relevant exemptions or safeguarding considerations.

Confidential and sensitive information

Not all information relating to governors is intended for public disclosure.

We will take appropriate steps to protect confidential information, including personal information relating to staff, pupils, families and other individuals, which may be included in governance papers or discussions.

Governors are expected to handle information obtained through their governance responsibilities appropriately and in accordance with the school's confidentiality, data protection and information security requirements.

8. Will your information be transferred outside the United Kingdom?

Some of the systems and service providers used by the school may store or process information outside the United Kingdom or allow access to information from another country.

Where personal information is transferred outside the United Kingdom, we will ensure that the transfer complies with applicable data protection legislation. This may involve relying on UK adequacy regulations, appropriate safeguards or another lawful transfer mechanism.

Where required, we will provide further information about the relevant transfer arrangements.

9. How do we protect your personal information?

We take appropriate technical and organisational measures to protect personal information against unauthorised access, accidental loss, destruction, alteration or disclosure.

These measures include, where appropriate:

- Restricting access to personal information to authorised individuals.
- Using password protection, access controls and other security measures.
- Maintaining secure electronic and paper records.
- Providing appropriate data protection and information security guidance.
- Using suitable contractual arrangements with external service providers.
- Applying procedures for the secure sharing and disposal of information.
- Investigating suspected personal data breaches and taking appropriate action.

Governor information is only accessible to individuals who need it to carry out their responsibilities.

Governors must take appropriate care when accessing, storing, sharing or disposing of school information, particularly when working remotely or using personal devices.

No system can be guaranteed to be completely secure. However, we take our responsibilities seriously and will respond appropriately to any suspected or confirmed personal data breach.

10. How long do we keep your personal information?

We retain personal information only for as long as necessary for the purposes for which it was collected, taking account of our legal obligations, governance requirements and any relevant limitation periods.

Different types of information are retained for different periods. For example, governor appointment records, declarations of interest, meeting minutes, training records, correspondence and safeguarding information may all have different retention requirements.

Our retention arrangements are informed by the school's records retention schedule and, where relevant, guidance issued by Devon County Council and other appropriate bodies.

Some governance records, including formal minutes and records of significant decisions, may need to be retained for extended periods to provide an accurate record of the governing body's work and demonstrate accountability.

When personal information is no longer required, we will securely destroy it or anonymise it where appropriate.

In some circumstances, we may need to retain information for longer, for example where it is required for a legal claim, an investigation or a statutory obligation.

If you require further information about the retention period applicable to a particular category of governor information, please contact the school or the Data Protection Officer.

11. What are your data protection rights?

Under data protection legislation, you have a number of rights in relation to your personal information. These rights are subject to certain conditions and exemptions.

Right to be informed

You have the right to receive clear information about how your personal information is collected and used. This privacy notice provides that information.

Right of access

You have the right to request a copy of the personal information the school holds about you. This is known as a subject access request.

Right to rectification

You have the right to ask us to correct inaccurate personal information and, where appropriate, to complete information that is incomplete.

Right to erasure

In certain circumstances, you have the right to request the deletion of your personal information. This right does not apply in every situation, particularly where the school needs to retain information to meet a legal obligation or perform a public task.

Right to restrict processing

In certain circumstances, you can ask us to restrict the use of your personal information while a concern about its accuracy or use is considered.

Right to data portability

In certain circumstances, you may have the right to receive personal information you have provided to us in a structured, commonly used and machine readable format, or to request that it is transferred to another organisation.

This right applies only to certain types of processing.

Right to object

You have the right to object to certain processing activities, including processing carried out on the basis of legitimate interests or public task.

Whether we must stop processing will depend on the circumstances, the lawful basis involved and any applicable legal obligations.

Rights relating to automated decision making

You have rights in relation to certain solely automated decisions that have legal or similarly significant effects on you, including relevant decisions involving profiling.

The extent of these rights depends on the circumstances and the applicable legal requirements.

Exercising your rights

If you wish to exercise any of your rights, or if you have questions about how your information is used, please contact the school or the Data Protection Officer using the details provided in this notice.

We may need to verify your identity before responding to a request.

We will respond within the timescales required by data protection legislation. In some circumstances, we may be unable to fulfil a request in full because an exemption applies or because we have a legal obligation to retain or process the information.

12. Is providing personal information compulsory?

Some personal information is necessary for us to manage governor appointments, maintain accurate governance records, communicate with governors and meet applicable legal and governance requirements.

Where you do not provide information that is necessary for these purposes, we may be unable to complete a particular process or fulfil a relevant requirement.

Where providing information is optional, we will explain this where appropriate and make clear the consequences of not providing it.

13. Will your personal information be used for automated decisions?

The school does not make decisions about governors solely through automated processing that produce legal or similarly significant effects.

If this changes, we will provide appropriate information about the processing, the reasons for it, the likely consequences and your relevant rights before introducing the arrangement, where required by law.

14. What should you do if you have a concern?

If you have concerns about how your personal information is being collected, used, stored or shared, you should contact the school or the Data Protection Officer in the first instance.

We will consider your concern and respond in accordance with our procedures.

You also have the right to complain to the Information Commissioner's Office (ICO), which is the independent regulator responsible for data protection in the United Kingdom.

Information about how to raise a concern is available on the ICO website:

<https://ico.org.uk/make-a-complaint/>

You can also find further information about your data protection rights and the responsibilities of organisations on the ICO website:

<https://ico.org.uk/>

15. Changes to this privacy notice

We may review and update this privacy notice from time to time to reflect changes in legislation, regulatory guidance, governance arrangements or the way we process personal information.

The latest version will be made available through the school's usual communication channels, including the school website where appropriate.

Where a significant change affects how we use your personal information, we will take appropriate steps to bring that change to your attention.

If you have any questions about this notice, please contact the school or the Data Protection Officer.