Privacy Notice (How we use information about Governors and Volunteers - GIAS)

The Earls High School collects and processes personal data relating to Governors and Volunteers who are engaged to work with us. We are committed to being transparent about how we collect and use the data and to meeting our data protection obligations. This privacy notice will inform you about why we collect and process a range of information about you.

The categories of information that we collect, process, hold and share include:

- personal information (such as name, address and contact details, entitlement to work in the UK (volunteers), where appropriate details of your bank, information about your marital status, next of kin and emergency contacts);
- special categories of data including characteristics information (such as gender, age, ethnic group);
- information about your engagement with us (such as start dates, terms and conditions of your engagement, your role as a Governor, hours engaged, activities you have engaged with);
- qualifications (such as skills and experience, where relevant);
- information about your criminal record;
- information from referees about your suitability to volunteer with children;
- information about medical or health conditions (such as whether or not you have a disability for which the organisation needs to make reasonable adjustments);
- information about your business and pecuniary interests, and any other governance roles you may have;
- images that we have sought consent to capture and use; and
- data about your use of the school's information and communications system.

We collect this information in a variety of ways. For example, data might be collected through a Governor application form; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during your engagement; from correspondence with you; or through meetings or other interaction with you.

We may collect personal data about you from third parties, such as references supplied by former employers and information from criminal records checks permitted by law.

Why we collect and use this information

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

We collect and use governor information for the following purposes:

- To enable the development of a comprehensive picture of who is operating within the school and how everyone is deployed.
- To ensure we meet statutory requirements in terms of our local governing body.
- To maintain accurate and up-to-date records and contact details (including details of who to contact in the event of an emergency).
- To operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace.
- To operate and keep a record of performance and related processes, to undertake skills analysis, and for succession planning and management purposes.
- To ensure that we comply with duties in relation to individuals with disabilities and meet our obligations under health and safety law.
- To respond to and defend against legal claims.
- To maintain and promote equality in the workplace.
- To ensure Safeguarding requirements are met.

Some special categories of personal data, such as information about health or medical conditions, are processed to carry out obligations under health and safety legislation and the Equality Act 2010 (such as those in relation to Governors/Volunteers with disabilities).

We may use artificial intelligence (AI) to support administration, recruitment, and data analysis in relation to governance. This processing is carried out in line with our legal obligations and public task in delivering education services. AI tools assist staff but do not replace professional judgement, particularly in safeguarding and employment decisions. We do not make solely automated decisions that have a significant impact on individuals without informing them and providing appropriate safeguards. All AI use is subject to human oversight, data protection controls, and strict security measures. Where applicable, the Trust will undertake a data protection impact assessment.

The lawful basis on which we process this information

Under the UK General Data Protection Regulation (UK GDPR), the legal basis/bases we rely on for processing personal information for general purposes are:

Article 6.1 (a) the data subject has given consent to the processing of his or her personal data in their role as a Governor/Volunteer

Article 6.1 (c) for the purpose named above in accordance with the legal basis of Legal Obligation

Article 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

All academy trusts, under the Academy Trust Handbook, have a legal duty to provide the governance information as detailed above.

In terms of processing special category data, the following will apply:

Article 9.2 (c) processing is necessary to protect the vital interests of the data subject

Article 9.2 (g) processing is necessary for reasons of substantial public interest and is authorised by domestic law

Under UK legislation the lawful basis is given under Section 13 (a) of the Education Act 1996.

Collecting governor information

We collect personal information via governor application forms and declaration of governor's acceptance of responsibilities forms.

Governor 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 UK 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 governor information

We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please visit IRMS Toolkit for Academies.

Detailed information about how we ensure the safe use of data can be found in our policies:

- Data Protection Policy (see Trust website)
- Information and Cyber Security Policy (see Trust website)
- Data Retention Policy
- ICT Acceptable Use Policy

Who we share governor information with

We routinely share this information with:

- the Department for Education (DfE)
- Stour Vale Academy Trust
- our clerking provider
- GovernorHub
- AvePoint

Department for Education

The Department for Education (DfE) collects personal data from educational settings and local authorities. We are required to share information about individuals in governance roles with the DfE under the requirements set out in the Academy Trust Handbook.

All data is entered manually on the 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.

Stour Vale Academy Trust

We are required to share information about individuals in governance roles with Stour Vale Academy Trust (our employer) as part of the process of fulfilling the data-sharing requirements above.

Clerking provider

We are required to share information about our governors with our clerking provider in order to facilitate local governing body meetings and all related communications.

GovernorHub

Our clerking provider uses GovernorHub, an online service, as its database to record all information collected on membership, including contact details. GovernorHub enables all individuals in governance roles to communicate and store documents, membership details, meeting schedules and other information in a secure and accessible place. We also use GovernorHub Knowledge to provide online training resources to individuals in governance roles and to record completion of such training.

AvePoint

We use AvePoint for secure cloud-to-cloud backup of online information and records held in Office 365, including that relating to governors and volunteers.

Why we share information

We do not share information about you with anyone 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:

- Stour Vale Academy Trust
- our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- the Department for Education
- educators and examining bodies
- our regulator, Ofsted
- suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll
- financial organisations
- central and local government
- our auditors
- health and social welfare organisations
- professional advisers and consultants
- charities and voluntary organisations
- police forces, courts, tribunals
- professional bodies

CCTV

This section of the privacy notice relates to CCTV systems, including, but not limited to, where it has been installed on the outside of some of the buildings. This section applies only to schools that have CCTV systems installed.

What personal information does this service use?

The CCTV system captures images of people and vehicles in and around where a camera is located. Where fixed CCTV cameras are operating, there will be signs clearly displayed. Images captured by CCTV will not be kept for longer than 30 days. However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated.

What is this personal information used for?

We use this personal data for the following reasons:

a) To increase personal safety of pupils, staff and visitors, and reduce the fear of crime.
b) To protect the school buildings and their assets.
c) To support the Police in a bid to deter and detect crime.
d) To assist in identifying, apprehending and potentially prosecuting

offenders.
e) To protect members of the public and private property.
f) To assist in managing the school.

What is the lawful basis we are relying on?

We collect and use this information to ensure the school can undertake its remit to educate children ensuring personal safety of pupils, staff and visitors, protecting school buildings and its assets and to assist in managing the school (Article 6(1)(e) of the UK General Data Protection Regulation). The school will use the 'Passport to Compliance', issued by the Surveillance Camera Commissioner, to ensure that the surveillance camera system complies with the Guiding Principles set out in the Surveillance Camera Code of Practice published by the Home Office as a requirement of the Protection of Freedoms Act 2012.

Where has your personal information come from?

The images are captured because you are present in the area which is covered by the CCTV system.

Who will we share this personal information with?

Your personal data is shared securely with the following, where it is both necessary and appropriate to do so:

- Relevant staff within the school
- Our local authority
- The Police

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact:

YourIG Data Protection Officer Service
Dudley MBC
The Council House
Dudley
West Midlands
DY1 1HF

Email: YourIGDPOService@dudley.gov.uk

Tel: 01384 815026

You also have the right to:

- ask us for access to information about you that we hold;

- have your personal data rectified, if it is inaccurate or incomplete;
- request the deletion or removal of personal data where there is no compelling reason for its continued processing;
- restrict our processing of your personal data (i.e. permitting its storage but no further processing);
- object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics;
- not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.

The Trust, in line with statutory guidance, will respond to Subject Access Requests within one calendar month. However, if the request is received during the school holiday, we will liaise with you to seek your agreement to treat receipt of the request as being on the first day of term.

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 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 Headteacher via the school office.

Data Use and Access Act 2025 (DUAA)

Under the Data Use and Access Act 2025 (DUAA), schools are required to provide an electronic complaints form for individuals who wish to raise concerns about how their personal data is handled.

If you have a complaint of this type, please complete the DUAA Complaints Form by clicking on this link.

Last updated

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated in September 2026.

Further information

If you would like to discuss anything in this privacy notice, please contact:

YourIG Data Protection Officer Service
Dudley MBC
The Council House
Dudley
West Midlands
DY1 1HF

Email: YourIGDPOService@dudley.gov.uk

Tel: 01384 815026

How Government uses your data

The governor data that we lawfully share with the DfE via 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 DfE hold about you

Under the terms of the UK 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