



# HIGHFIELDS SCHOOL

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PRIVACY NOTICE FOR GOVERNORS / TRUSTEES

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BOUNDARY WAY, PENN, WOLVERHAMPTON, WV4 4NT  
Telephone: 01902 556530 E-mail: [enquiries@hswv.co.uk](mailto:enquiries@hswv.co.uk) Website: [www.hswv.co.uk](http://www.hswv.co.uk)

## **Privacy notice for governors / trustees**

Under data protection law, individuals have a right to be informed about how the Trust 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 we collect, store and use personal data about individuals who represent the Trust in any governance role.

The trust, Highfields School, is the 'data controller' for the purposes of data protection law.

## **The personal data we hold**

We process data relating to individuals who represent the Trust in any governance role. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Personal identifiers, contacts and characteristics (such as name, date of birth, contact details and postcode)
- Governance details (such as role, start and end dates and governor id)

## **Our lawful basis for using this data**

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

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

- To meet the statutory duties placed upon us

Under the [UK General Data Protection Regulation \(UK GDPR\)](#), the lawful 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 for one or more specific purposes
- Article 6, 1, (c) processing is necessary for compliance with a legal obligation to which the controller is subject
- 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

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law

- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

We also collect and use personal data where it is necessary to meet the legal responsibilities set out in data protection legislation, other UK law and regulation that applies to schools. These include the following:

- Education Act 2011
- Keeping Children Safe In Education 2023
- Safeguarding Vulnerable Groups Act 2006
- The Childcare (Disqualification) Regulations 2009

## **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 or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

## **Collecting this information**

We collect personal information via data collection sheets, governor contact forms.

Governance roles data is essential for the academy trust'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.

## **How we store this data**

Personal data is stored in line with the Trust's records management policy and procedure. This policy is based on retention guidance published by the Information Records Management Society (IRMS) in their toolkits for schools and academies.

In accordance with UKGDPR, the Trust does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected.

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.

## **Data sharing**

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

We are required to share information about individuals in governance roles with the Department for Education (DfE) under the requirements set out in the [Academies Financial Handbook academy trust handbook](#)

We are also required under the Companies Act 2006 to submit the names and contact details of Trust Members and Trustees to Companies House, as part of our filing obligations as a company registered as a charity.

All governors data is entered manually on the GIAS service and held by the Department for Education (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.

Your personal data is also shared with the providers of services used to support the Trust. This includes where your name and contact information is needed by the Local Authority for the purposes of managing panels and meetings requiring governor/trustee participation. Your contact information may also be shared with Services4Schools Ltd if you are required to support with Audit processes and matters of compliance/GDPR.

## Your rights

### How to access personal information we hold about you

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our data protection officer.

### Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
  - Prevent your data being used to send direct marketing
  - Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
  - In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
  - Claim compensation for damages caused by a breach of the data protection regulations
- To exercise any of these rights, please contact our data protection officer.

### Questions/Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

If you have any questions, concerns or would like more information about anything mentioned in this Privacy Notice, please contact our Information Management Systems Manager:

Mr W Harrison - [wharrison@hswv.co.uk](mailto:wharrison@hswv.co.uk), telephone 01902 556530

or by writing to Highfields School, Boundary Way, Wolverhampton, WV4 4NT.

Alternatively, you may wish to contact our Data Protection Officer:

Services 4 Schools - [DPO@hswv.co.uk](mailto:DPO@hswv.co.uk)

or by writing to Highfields School, Boundary Way, Wolverhampton, WV4 4NT.

Please address letters: For the attention of the Data Protection Officer.

To make a complaint, please contact our Data Protection Officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

## **Revisions and 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 November 2023

## How government uses your data

The governance data that we lawfully share with the Department for Education (DfE) via GIAS will:

- increase the transparency of governance arrangements
- enable local authority maintained schools, academies, academy trusts and the Department for Education (DfE) to identify more quickly and accurately individuals who are involved in governance and who govern in more than one context
- allow the Department for Education (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

## Data collection requirements

To find out more about the requirements placed on us by the Department for Education (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 Department for Education (DfE) and education establishment users with a Department for Education (DfE) Sign-in (DSI) 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 Department for Education (DfE) 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>

To contact DfE: <https://www.gov.uk/contact-dfe>