Privacy Notice for Governors

Kenilworth Primary School

Our Vision

'High Aspirations Today, Inspiring the Leaders of Tomorrow.'

PRIVACY NOTICE FOR GOVERNORS

Last updated: November 2026

Kenilworth Primary School is committed to protecting the privacy and security of your personal information.

This privacy notice explains how we collect and use personal information about you as a governor, in accordance with UK data protection law (the UK General Data Protection Regulation, the Data Protection Act 2018, and the Data (Use and Access) Act 2025).

Please read this notice carefully so you understand how and why we use your information.

About this notice

Kenilworth Primary School is a Hertfordshire LA maintained school. We are a "data controller", which means we are responsible for deciding how we hold and use personal information about you.

Our Data Protection Officer is Mr Anil Mepani.

If you have any questions about this privacy notice, please contact:

- **Email:** dpo@kenilworth.herts.sch.uk
- **Phone:** 0208 953 3459

Data protection principles

We will comply with data protection law, which says that personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way
2. Collected only for valid purposes that we have clearly explained to you
3. Relevant to the purposes we have told you about and limited only to those purposes
4. Accurate and kept up to date
5. Kept only as long as necessary for the purposes we have told you about
6. Kept securely

What information do we hold about you?

Personal data means any information about an individual from which that person can be identified.

Special categories of personal data are more sensitive and require higher levels of protection.

We collect and hold the following information about you:

Standard personal information:

- Personal contact details (name, title, addresses, telephone numbers, personal email addresses)
- Date of birth
- Gender
- Occupation
- Start date as a governor
- Skills and experience
- Information from your application to become a governor, including:
    - Identity checks (DBS checks, Barred Lists checks, disqualification checks)

    - Information about bankruptcy
    - References
    - CV, application form or cover letter
- Information about pecuniary or business interests held by you or your family members
- Information about other posts you hold
- Information about your conduct
- Information about your use of our IT and communications systems
- Photographs
- Financial information (such as expenses claimed)

Special categories of sensitive information:

- Information about your race or ethnicity
- Information about criminal records, fines and other judicial records

How we collect your information

We collect personal information about governors:

- Through the application and recruitment process (directly from you or sometimes from external organisations such as SGOSS or the Local Authority)
- During the course of your governor activities throughout your term of appointment

How we use your information

Our legal basis

We will only use your personal information when the law allows us to. Most commonly, we use your information:

1. **Where we need to comply with a legal obligation** (e.g., safeguarding checks)
2. **Where we need to protect your interests** (or someone else's interests)
3. **Where it is needed in the public interest or for official purposes** (e.g., fulfilling our governance responsibilities)
4. **Where we have your consent** (e.g., publishing your photograph on our website)

Specific situations where we process your information

We use your personal information for the following purposes:

Governance and administration:

- Making decisions about your appointment as a governor
- Dealing with governor election processes
- Checking your suitability to be a governor (including DBS checks)
- Complying with safeguarding obligations
- Publishing information about our governors on our website and online databases (e.g., Get Information About Schools)
- Keeping records of governor decision-making (minutes, reports, documentation)
- Recording your name, opinions, comments and decisions when you sit on committees or panels (e.g., complaints, exclusions, HR matters)

- Making decisions about your continued appointment
- Making arrangements for the termination of your appointment
- Carrying out governance reviews

School operations:

- Communicating with stakeholders about the school
- Delivering the school's services to our community
- Business management, administrative and planning purposes (including accounting and auditing)
- Processing expenses claims
- Education, training and development for governors
- Responding to complaints or investigations from stakeholders or regulators
- Dealing with legal disputes
- Preventing fraud

Compliance and security:

- Complying with health and safety obligations
- Monitoring use of our IT and communication systems to ensure compliance with our policies
- Ensuring network and information security
- Maintaining and promoting equality
- Liaising with regulatory bodies, the Department for Education, the DBS and the Local Authority about your suitability or other regulatory matters

Legal and advisory:

- Receiving advice from external advisors and consultants
- Establishing, exercising or defending legal claims

If you don't provide information

If you fail to provide certain information when requested, we may be prevented from complying with our legal obligations (such as safeguarding) or unable to fulfil our governance responsibilities.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider we need to use it for another compatible reason. If we need to use it for an unrelated purpose, we will notify you and explain the legal basis.

We may process your personal information without your knowledge or consent where this is required or permitted by law.

How we use sensitive personal information

Special categories of sensitive personal information require higher levels of protection. We may process this information:

1. **With your explicit written consent** (in limited circumstances)
2. **Where we need to carry out our legal obligations** (in line with our Data Protection Policy)
3. **Where it is needed in the public interest** (in line with our Data Protection Policy)
4. **Where it is needed for legal claims** or to protect your interests (or someone else's) when you cannot give consent
5. **Where you have already made the information public**

Health information

We will use information about your physical or mental health, or disability status, to:

- Ensure your health and safety
- Provide appropriate adjustments to comply with the Equality Act 2010

Criminal conviction information

We may use information about criminal convictions where the law allows us to, usually where:

- It is necessary to carry out our obligations (in line with our Data Protection Policy)
- It is necessary for legal claims
- It is necessary to protect your interests (or someone else's) and you cannot give consent
- You have already made the information public

We will hold information about criminal convictions if it comes to light through DBS checks or during your time as a governor.

Who we share your information with

We may share your data with third parties where required by law, where it is needed in the public interest or for official purposes, or where we have your consent.

Organisations we may share your data with include:

- Hertfordshire County Council (our Local Authority)
- The Department for Education
- The Disclosure and Barring Service
- HfL/HCC HR Advisory Team
- Data Management Services for Schools
- Our legal advisors (HCC)
- The police or other law enforcement agencies
- Regulators and oversight bodies
- External advisors and consultants

Data security with third parties

All third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow them to use your personal data for their own purposes.

Freedom of Information requests

We may disclose your personal data in response to a Freedom of Information Act 2000 request or a data subject access request. We will only disclose your data if we are satisfied it is reasonable to do so in all the circumstances.

International transfers

We may transfer your personal information outside the UK. If we do, we will ensure a similar degree of protection is in place.

How we keep your information secure

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.

Our security measures include:

- Paper-based records and portable electronic devices are kept under lock and key when not in use
- Complex passwords are used to access school systems
- Encryption software protects portable devices and removable media
- Access to your information is limited to those who have a business need to know
- We have procedures to deal with suspected data security breaches

We will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

How long we keep your information

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including satisfying any legal, accounting, insurance or reporting requirements.

We follow retention periods set out in the Information Records Management Society (IRMS) guidance for schools. Details are available in our Data Protection Policy (Appendix 2: Data retention schedule).

Key retention periods for governor information:

- **Governor meeting minutes:** 10 years from the date of the meeting
- **Governor personnel records:** During your appointment + 6 years
- **DBS checks and safeguarding information:** As per statutory guidance

Once you are no longer a governor, we will securely archive or destroy records in accordance with IRMS guidance.

In some circumstances we may anonymise your personal information so it can no longer be associated with you.

Your rights

Your duty to inform us of changes

Please keep us informed if your personal information changes during your appointment as a governor.

Your rights under data protection law

You have the right to:

- **Request access** to your personal information (Subject Access Request)
- **Request correction** of inaccurate or incomplete information
- **Request erasure** of your personal information (in certain circumstances)
- **Object to processing** of your personal information (in certain circumstances)
- **Request restriction of processing** (e.g., if you want us to establish accuracy)
- **Request transfer** of your personal information to another party (in certain circumstances)
- **Withdraw consent** where we are relying on consent to process your data

How to exercise your rights

To exercise any of these rights, please contact our Data Protection Officer:

Mr Anil Mepani

- **Email:** dpo@kenilworth.herts.sch.uk

- **Phone:** 0208 953 3459

Response times: We will respond to Subject Access Requests within **one calendar month**.

As we have limited staff resources outside of term time, we encourage you to submit requests during term time where possible. This will help us respond as promptly as possible.

No fee usually required

You will not normally have to pay a fee to access your personal information or exercise your other rights. However, we may charge a reasonable fee if your request is manifestly unfounded or excessive, or we may refuse to comply with the request.

What we may need from you

We may request specific information from you to confirm your identity and ensure your right to access the information. This is a security measure to ensure personal information is not disclosed to unauthorised people.

Right to complain

If you have concerns about how we handle your personal information, please contact us first:

Mr Anil Mepani (Data Protection Officer)

- **Email:** dpo@kenilworth.herts.sch.uk
- **Phone:** 0208 953 3459

You also have the right to complain to the Information Commissioner's Office (ICO):

- **Phone:** 0303 123 1113
- **Email:** Via the ICO website at https://ico.org.uk/global/contact-us/email/
- **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- **Website:** https://ico.org.uk/concerns/

Changes to this privacy notice

We may update this privacy notice from time to time. When we make substantial changes, we will provide you with a new notice and may notify you in other ways.

Contact us

If you have any questions about this privacy notice, please contact:

Mr Anil Mepani (Data Protection Officer)

- **Email:** dpo@kenilworth.herts.sch.uk
- **Phone:** 0208 953 3459
- **Post:** Kenilworth Primary School

Acknowledgement

Please complete and return this form to confirm you have received and understood this privacy notice.

I, _____ (Governor name), acknowledge that on _____ (date), I received a copy of Kenilworth Primary School's Privacy Notice for Governors and that I have read and understood it.

Signature: _____

Print name: _____

Date: _____