



Leamington Federation

Lighthorne Heath Primary School

Privacy Notice for Governors - How we use your information

Who are we?

Lighthorne Heath Primary School, part of the Leamington Federation, is the data controller for the personal information described in this notice. This means that the school decides why and how this information is used. The school is registered with the Information Commissioner's Office (ICO), registration number Z737279X.

You can contact the school at: Lighthorne Heath Primary School, Stratford Road, Lighthorne Heath, Leamington Spa, Warwickshire, CV33 9TW; email admin2064@welearn365.com.

Our Data Protection Officer

Our Data Protection Officer (DPO) is the School Data Protection Officer Service, Warwickshire Legal Services. You can contact the DPO at schooldpo@warwickshire.gov.uk, telephone 01926 412859, or by post at Warwickshire Legal Services, Warwickshire County Council, Shire Hall, Market Square, Warwick, CV34 4RL. Please state that your enquiry relates to Lighthorne Heath Primary School.

About this privacy notice

This notice explains how we collect, use, store and share personal information about governors, associate members and other individuals in governance roles. It is provided in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025. We also follow current Department for Education (DfE) data protection guidance for schools and relevant ICO guidance.

We review privacy information at least annually and whenever there is a significant change to the way personal information is used. Where a new use would not reasonably be expected, we will update this notice and bring the change to the attention of affected individuals before the new processing begins.

What personal information do we collect?

- full name, title, contact details, date of birth, postcode and previous names where required for identification;
- governance role, appointing body, date of appointment, term of office and date of leaving;
- attendance at governing body and committee meetings;
- business, financial and pecuniary interests, governance roles elsewhere and relevant relationships or conflicts of interest;
- DBS and eligibility information where checks are required or permitted;
- skills, experience, training and development records;
- information required for Get Information About Schools (GIAS) and local-authority governance records;
- equality and diversity information where collected, normally on a voluntary basis and handled in a way designed to avoid identification when published in aggregate;
- photographs or profile information where used with an appropriate lawful basis; and
- correspondence, declarations, complaints, investigations or other governance records where relevant to the role.

Where does the information come from?

Most information comes directly from governors or the body that appoints or elects them. We may also obtain information from the local authority, DfE/GIAS, DBS where applicable, previous governance records, school staff, public registers and other lawful sources needed to verify eligibility, interests or governance responsibilities.

Why do we use governor information?

- administer appointments, elections, terms of office, meetings and committee membership;
- ensure governors are eligible to hold office and complete relevant safeguarding checks;
- manage declarations of interest and conflicts of interest transparently;
- maintain governance records and support effective oversight, training and evaluation;
- provide required governance information to DfE through GIAS and to Warwickshire County Council;
- publish information about governance arrangements, attendance and relevant interests where required or recommended for maintained schools;
- meet legal, audit, safeguarding and accountability requirements; and
- communicate with governors and support the effective operation of the governing body.

Our lawful bases for using personal information

We only use personal information where data protection law allows us to do so. Depending on the purpose, our lawful bases under Article 6 UK GDPR may include:

- Article 6(1)(c) - compliance with legal obligations applying to maintained-school governance and statutory information requirements;
- Article 6(1)(e) - performance of public tasks and exercise of official authority connected with the governance of a maintained school;
- Article 6(1)(d) - protection of vital interests in an emergency; and
- Article 6(1)(a) - consent for limited optional uses, such as some photographs or voluntary diversity information, where consent is appropriate.

Where we use special category data, such as health, ethnicity, religious belief, trade union membership or information about a person's sex life or sexual orientation, we also identify a condition under Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018. These commonly include employment and social protection obligations, substantial public interest, health or social care, vital interests, legal claims, or explicit consent where consent is genuinely appropriate.

Criminal offence and safeguarding-vetting information is handled only where authorised by law, including Article 10 UK GDPR and the Data Protection Act 2018, and is subject to additional safeguards and restricted access.

Publication and Get Information About Schools (GIAS)

Governors hold public office. The school must provide up-to-date governance information to DfE through GIAS under section 538 of the Education Act 1996. Public GIAS information includes a governor's full name, appointing body, appointment and end dates, and status such as Chair. DfE also collects identifying information such as date of birth, postcode and previous names for due-diligence purposes; this information is not published. The school also publishes governance information on its website in line with current maintained-school publication expectations, including attendance and relevant business or pecuniary interests. Only information that is required, recommended and proportionate will be published.

Who may we share governor information with?

- Department for Education, including through GIAS;
- Warwickshire County Council and governance support services;
- the school community and wider public where governance information must or should be published;
- DBS and safeguarding bodies where relevant checks or referrals are legally required;
- auditors, legal advisers, regulators or insurers where necessary; and
- IT and governance-system providers acting under contract and on our instructions.

How we keep information secure

We use appropriate technical and organisational measures to protect personal information against accidental or unlawful loss, alteration, disclosure or access. Access is limited to people who need the information for their role. Our service providers must process information only on our instructions, keep it secure and meet data protection requirements.

How long we keep information

Governance records are retained in accordance with the school's retention schedule, relevant governance requirements and DfE guidance. Some records, such as minutes and key governance decisions, may need to be retained for long

periods or permanently; personal details that are no longer needed are removed or securely destroyed when the applicable retention period ends.

Records are securely deleted, destroyed or anonymised when they are no longer required. Our retention arrangements are reviewed regularly and are informed by the school's retention schedule, DfE guidance and the Information and Records Management Society (IRMS) Schools Toolkit where applicable.

International transfers

Some suppliers may store or access information outside the UK. Where this happens, we ensure that a lawful transfer mechanism and appropriate safeguards are in place, for example UK adequacy regulations or approved contractual safeguards, and we assess the protection available for the information concerned.

Automated decision-making and artificial intelligence

We do not currently use solely automated decision-making that produces legal or similarly significant effects on individuals. If this changes, or if we introduce an AI-enabled system that uses personal information in a way that could materially affect individuals, we will assess the data protection risks, update our privacy information where necessary and provide meaningful information about the use of the system.

Your data protection rights

Depending on the circumstances and the lawful basis being used, you may have the right to:

- ask for access to your personal information and receive a copy of it;
- ask us to correct inaccurate or incomplete information;
- ask us to erase information in certain circumstances;
- ask us to restrict the use of information in certain circumstances;
- object to particular uses of personal information in certain circumstances;
- receive personal information in a portable format where the right to data portability applies;
- withdraw consent at any time where we rely on consent; withdrawal does not affect processing already carried out lawfully; and
- challenge a decision based solely on automated processing where the law gives that right.

These rights are not absolute and may be limited where another legal duty or exemption applies. We will explain this if it affects a request. Requests can be made to the school or the DPO. We normally respond to valid data protection rights requests within one month, subject to the rules in data protection law.

Concerns and complaints

If you have a concern about how we use personal information, please contact the school or our DPO first so that we can try to resolve it. You also have the right to complain to the Information Commissioner's Office (ICO). Current contact details and complaint routes are available at ico.org.uk.

Reviewed: September 2026

Next review: September 2027

Chair of Governors: Richard Butler