Privacy Notice

October 2026
V15

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

Hales Valley Trust collects and processes personal data relating to Directors, Trustees, members and Volunteers who are engaged to work with us. **Hales valley Trust** is committed to being transparent about how it collects and uses the data and to meeting its data protection obligations. This privacy notice will inform you about why **Hales Valley Trust** collects and processes 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, where appropriate details of your bank, national insurance number, information about your marital status, next of kin, dependants 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 director, trustee, member or volunteer, hours engaged, activities you have engaged with).
- Qualifications (such as skills and experience, where relevant).
- Information about your criminal record.
- Details of any disciplinary or grievance procedures in which you have been involved (such as any warnings issued to you and related correspondence).
- Information about medical or health conditions (such as whether or not you have a disability for which the organisation needs to make reasonable adjustments).

Hales Valley Trust collects this information in a variety of ways. For example, data might be collected through a Director, Trustee, Member/volunteer 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.

In some cases, **Hales Valley Trust** 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 Director, Trustee, Member /volunteer information, for the following purposes:

- Enable the development of a comprehensive picture of who is operating within the school and how everyone is deployed.
- Ensure we meet statutory requirements in terms of our Governing body.

- Maintain accurate and up-to-date records and contact details (including details of who to contact in the event of an emergency).
- Operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace.
- 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.
- Respond to and defend against legal claims.
- 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, is processed to carry out obligations under Health and Safety and Disability Discrimination Act (such as those in relation to Director, Trustee, Member /volunteers with disabilities).

From September 2026 schools are required to record details of allergies that you, as a visitor need to inform us about to ensure your health and wellbeing when in school. We will ask (as specified under 'Benedicts Law') for only enough information to help keep you safe whilst you are visiting the school. These details will be retained in line with the UK Data Protection Act 2018 and the school Privacy Notice.

We may use artificial intelligence (AI) to support workforce administration, recruitment, and data analysis. 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

6.1 (a) The data subject has given consent to the processing of his or her personal data for one or more specific purposes, in their role as a Governor (Article 6, 1 (a))

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

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 maintained school governing bodies, under **section 538 of the Education Act 1996** and academy trusts, under the **Academies Financial 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 the following Acts:

- Section 13(a) of the Education Act 1996
- Section 22 and Schedule 6 of the Education Act 2002
- Section 31(1a&b), (2a) of the School Governance (Constitution) (England) Regulations 2012.

Collecting Director, Trustee, Member /volunteer information:

We collect personal information via for example, **Director, Trustee, Member** /volunteer contact forms.

This 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 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 Director, Trustee, Member /volunteer 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 see our retention policy. Data will be stored in a range of different places, including the personnel file, in the organisation's HR management systems and in other IT systems (including the organisation's email system).

Who we share Director, Trustee, Member /volunteer information with:

Your information may be shared internally, including senior staff whom you report to or who have supervisory/management responsibilities for you and business support and IT staff if access to the data is necessary for performance of your activities.

Hales Valley Trust share this information with:

- Our local authority (where applicable)
- The Department for Education (DfE)
- NHS Public Health England
- Microsoft Teams
- School Life
- GovernorHub (Secure Cloud based platform for governance evident and documentation I.e Board meetings, Local Committee meetings across Hales Valley Trust)
- Employment Check (DBS online portal)
- NGA (Learning platform)
- National Online Safety (Learning Portal)
- Inventry - As part of the school's visitor management system we will ask for your name, who you work for, and car registration. We will also record when you arrive and when you leave the school. This information is to ensure that we meet our duty of care under health and safety and the safeguarding of our children. Our data retention period for this information is current year + 6 years. Please note that we will also take a photograph of you and this will be retained on our visitor management system in order for us to use again should you visit us again. If you would prefer your photograph to be removed from the database once your visit is complete please advise either our

receptionist or your host"

- RPA (Davies Group) - Risk Protection Assurance - (Liability Insurance provider)
- Scriba - Scriba is an intelligent clerking tool which uses AI to write minutes of meetings, capturing decisions from a committee or recording actions from and tracking actions. It produces minutes in tailored formats that are designed for the specific requirements of different boards and meetings within the education sector, for example by capturing challenge and accountability.
- Canva- Canva for Education (and all content and media incorporated therein) for educational purposes may be used by schools. In the context of schools this can include using Canva as a platform to produce promotional material, newsletters, school memorabilia for school proms, leavers books, etc.
- Trellis is a hosted system which means that all updates, maintenance and management can be performed in a central location by Trellis Education Limited.
- Microsoft 365 Education including Copilot- Microsoft 365 Education is a productivity suite that provides a suite of applications that can assist with students learning and collaboration. Microsoft 365 builds on top of Office 365 apps such as Word, Excel, PowerPoint, and Outlook and provides enhanced management, security, and compliance tools. In addition, an artificial intelligence tool 'Copilot' is included as part of the M365 Education suite of apps and complements the above tools.

Local authority

We are required to share information about our governance with our local authority (LA) to comply with our legal obligations, such as safeguarding concerns, making a decision about your recruitment and employment, assessing qualifications for a particular job or task, gathering evidence for possible grievance or disciplinary hearings.

The lawful basis to share information about our Director, Trustee, Member /volunteers with our local authority (LA) is contained under section 538 of the Education Act 1996.

Department for Education
The Department for Education (DfE) collects personal data from educational settings and local authorities. We are required to share information about our directors, members, advocates with the Department for Education (DfE), under:

We are required to share information about our individuals in governance roles with the (DfE) under the requirements set out in the Academies Financial 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.

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:

- our local authority – to meet our legal obligations to share certain information with it, such as

safeguarding concerns
- the Department for Education
- your family or representatives
- 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
- survey and research organisations
- 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 our CCTV System, including, but not limited to, where it has been installed on the outside of some of our buildings.

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 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, 3-5 St James's Road, Dudley, DY1 1HZ
Email: YourIGDPOService@dudley.gov.uk
Tel: 01384 815607

You also have the right to:

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

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.

Data Use and Access Act 2025 (DUAA)

Under the Data Use and Access Act 2025 (DUAA)**,** Complaints about data protection matters are handled under our **data protection policy** and in accordance with relevant guidance from the Information Commissioner's Office (ICO). If you have serious concerns, you may wish to contact the ICO directly, but the ICO will usually expect you to have raised your concerns with our Data Protection Officer in the first instance.

If you have a complaint, please refer to the Data Protection Policy available on Lutley Primary School website – click here

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 August 2026.

Further information:

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

YourIG Data Protection Officer Service
Dudley MBC, 3-5 St James's Road, Dudley, DY1 1HZ
Email: YourIGDPOService@dudley.gov.uk tel: 01384 815607

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 publically 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

or https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights

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