



THE BISHOP'S STORTFORD HIGH SCHOOL

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Privacy Notice For Governors

V20260729A

The Bishop's Stortford High School is required by law to collect and process personal data relating to all of its governors. This privacy notice provides you with information about how we collect and process personal data of our governors in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The main reason that The Bishop's Stortford High School collects/processes data is so that it can run effectively and safely as a school as well as to meet its legal obligations.

The Bishop's Stortford High School is committed to protecting the privacy and security of your personal information.

The Bishop's Stortford High School is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

This notice applies to current and former (during retention period) Governors.

Please see the Glossary at the end of this privacy notice for definitions of key terms.

Who are we?

The Bishop's Stortford High School is a Maintained Foundation 11-18 Secondary School in Hertfordshire. Educating approximately 1275 students, The Bishop's Stortford High School provides a single-sex education for boys in Years 07 to 11 and has a large, thriving co-educational sixth form, with over one hundred girls on roll.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept securely

The types of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Date of birth
- Sex
- Pronouns
- Relevant medical information including any conditions or allergies you may have, the need for epi-pens/medication, emergency contact and doctor's details
- Next of kin and emergency contact information

- Occupation
- Start date
- Skills and experience
- Copy of passport
- Copy of driving licence
- Driving Licence status and points (If driving minibuses or for School Business)
- Car Registration Plate(s)
- Information acquired as part of your application to become a governor (including copies of identity checks (including Standard or Enhanced Disclosure and Barring Service Checks, Barred Lists Checks, and disqualification checks, information about bankruptcy, references and other information included in a CV, application form or cover letter or as part of the application process)
- Information about pecuniary or business held by you or your family members
- Information about other posts held by you
- Information about your conduct
- CCTV footage and other information obtained through electronic means such as swipe-card records
- Information about your use of our information and communications systems
- Photographs

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions
- Information about your health, including any medical condition
- Information about your criminal records, fines and other similar judicial records

How is your personal information collected?

We collect personal information about governors through the application and recruitment process, either directly from individuals (ie: referees) or sometimes from an external organisation such as SGOSS and the Local Authority.

We will also collect additional personal information in the course of governor activities throughout the term of your appointment.

How we will use information about you

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

- Where we need to comply with a legal obligation
- Where we need to protect your interests (or someone else’s interests)
- Where it 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
- Where we have your consent
- Where it is necessary for our legitimate interests or the legitimate interests of a third party

Situations in which we will use your personal information

The situations in which we will process your personal information include (but are not limited to):

- Making a decision about whether to appoint you as a governor
- Dealing with any processes for the election of governors
- Checking your suitability to be a governor
- Complying with our general safeguarding obligations
- Providing information on our website about our governors
- Providing information on any online databases to set out our governance arrangements
- Communicating with stakeholders about the School
- Delivering the school’s services to our community, and to carry out any other voluntary or charitable activities for the benefit of the public as provided for in our constitution and statutory framework
- Business management, administrative and planning purposes, including accounting and auditing
- Financial information such as expenses claimed
- Responding to complaints or investigations from stakeholders or our regulators

- Sending you communications connected with your role as a governor
- Making decisions about your continued appointment as a governor
- Making arrangements for the termination of your appointment
- Education, training and development requirements
- For the purposes of carrying out governance reviews
- Dealing with legal disputes involving you or other stakeholders
- Complying with health and safety obligations
- For the purposes of keeping records about governor decision-making processes, including copies of minutes, reports and other documentation
- Where you sit on a committee or a panel on a school matter we may process your name, opinions, comments and decisions attributed to you, for example, if you sit on a panel for the purposes of considering a complaint, exclusion or HR issue
- To prevent fraud
- To monitor your use of our information and communication systems to ensure compliance with our IT policies
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution
- To maintain and promote equality
- To receive advice from external advisors and consultants
- In appropriate circumstances to liaise with regulatory bodies, the Department for Education, the DBS and the Local Authority about your suitability to be a governor or in connection with other regulatory matters

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

In addition, the school also uses CCTV cameras around the school site for security purposes and for the protection of students, staff and visitors. CCTV footage may be referred to during the course of disciplinary procedures (for staff or students) or investigate other issues. CCTV footage involving governors will only be processed to the extent that it is lawful to do so. Please see our CCTV policy/code of practice for more details.

If you fail to provide personal information

If you fail to provide certain information when requested, we may be prevented from complying with our legal obligations (such as to discharge our safeguarding obligations) or we may be unable to discharge our obligations which may be in the public interest or for official purposes.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

“Special categories” of particularly sensitive personal information require us to ensure higher levels of data protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent
- Where we need to carry out our legal obligations and in line with our data protection policy
- Where it is needed in the public interest and in line with our data protection policy

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

Our obligations

We will use your particularly sensitive personal information in the following ways:

- We will hold information relating to sickness-related absence from your governor commitments.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety and to provide appropriate adjustments to comply with the Equality Act 2010.

Do we need your consent?

We do not need your consent if we use your particularly sensitive information in accordance with our written policy where processing is necessary:

- for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity
- for reasons of substantial public interest, on the basis of domestic law which shall be proportionate to the aim pursued, where we respect the essence of the right to data protection and where we provide for suitable and specific measures to safeguard your fundamental rights

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We envisage that we will hold information about criminal convictions, for example, if information about criminal convictions comes to light as a result of our appointment and Disclosure and Barring Service checks, or if information about criminal convictions comes to light during your time as a governor.

Automated Decision-Making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- Where we have notified you of the decision and given you 21 days to request a reconsideration
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Data Sharing - Who we share information with

We may have to share your data with third parties, including third-party service providers and other organisations.

In particular, we may share your data with organisations including, but not limited to, the following:

- the Local Authority
- the Department for Education
- the Education & Skills Funding Agency
- the Disclosure and Barring Service

- our external HR provider, for example, if you are involved in considering a disciplinary matter
- the Police or other law enforcement agencies
- our IT provider
- our legal advisors / other external consultants
- insurance providers / the Risk Protection Arrangement
- other governors

We require third parties to respect the security of your data and to treat it in accordance with the law. Some of the organisations referred to above are joint data controllers. This means we are all responsible to you for how we process your data.

Data Sharing - Why might we share your personal information with third parties?

We will share your personal information with third parties where required by law, in connection with legal proceedings, where it is needed in the public interest or for official purposes or where we have your consent.

Data Sharing - Which third-party service providers process your personal information?

“Third parties” includes third-party service providers (including contractors and designated agents). We will advise governors if we begin to use third-party service providers in the future.

Data Sharing - How secure is your information with third-party service providers?

All our 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 our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data Sharing - Other third parties

We may share your personal information with other third parties, for example in the context of the possible academy conversion or joining a Multi Academy Trust. We may also need to share your personal information with a regulator or to otherwise comply with the law.

From time to time, we may disclose your personal data in response to a request for information pursuant to the Freedom of Information Act 2000 or following a data subject access request. We may approach you for your consent but, in any event, we will only disclose your personal data if we are satisfied that it is reasonable to do so in all the circumstances. This means that we may refuse to disclose some or all of your personal data following receipt of such a request.

Data Sharing - Transferring information outside the EU

The personal information that we collect is stored within the UK and European Economic Area (EEA). However, there may be some circumstances where it is necessary to transfer and store personal information at a destination outside the UK or the EEA. In these circumstances, we will take all steps reasonably necessary to ensure that personal information is treated securely and in accordance with data protection law and, in the event that personal information is transferred outside the UK or the EEA, shall ensure that this is carried out subject to the requirements of the UK GDPR.

Data Security - Measures and procedures

We have put in place measures to protect the security of your information. Details of these measures are available request.

Third parties who are processing personal data on our behalf will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it 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. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Data Protection Officer.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data Retention - How long will we use your information for?

Personal data is stored in line with the school's Data Retention Policy/Schedule. This schedule is based on guidance in the retention schedule by the Information Record Management Society (IRMS) in their Schools Toolkit, along with some customisations made by HFL advisers and TBSHS Senior Management.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, insurance or reporting requirements. Details of retention periods for different aspects of your personal information are available in our Data Retention Policy/Schedule which is available from the Data Protection Officer. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a governor of The Bishop's Stortford High School we will retain and securely destroy your personal information in accordance with our data retention policy/schedule as well as applicable laws and regulations.

**** In March 2026, the Chair of the Independent Inquiry into Grooming Gangs issued a high-level instruction to retain and preserve any material, digital or physical, that may be relevant to the inquiry. The inquiry has now issued a formal notice requiring individuals and organisations who hold potentially relevant information to preserve it and not destroy, conceal, or alter it. If you have any enquiries, please contact contactus@grooming-gangs.independent-inquiry.uk. ****

<https://groominggangs.s3.amazonaws.com/uploads/2026/04/Prohibition-on-the-destruction-of-documents-Statutory-Independent-Inquiry-into-Grooming-Gangs.pdf>

Data Accuracy - Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your appointment as a governor.

Data Rights - Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (data subject access request). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below)
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it
- **Request the transfer** of your personal information to another party

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing.

We will always seek to comply any requests regarding your rights, however please note that we may still be required to hold or use your information to comply with legal duties.

For further information about your rights, including the circumstances in which they apply, see the guidance from the Information Commissioners Office (ICO) on individuals' rights under the UK GDPR.

The legal timescales for the school to respond to a Subject Access Request is one calendar month. As the school has limited staff resources outside of term time, we encourage you to submit any Subject Access Requests during term time and to avoid sending a request during periods when the school is closed or is about to close for the holidays where possible. This will assist us in responding to your request as promptly as possible. For further information about how we handle Subject Access Requests, please see our Subject Access Request Policy.

Data Rights - Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data Protection Officer / ICO

We have a Data Protection Officer (DPO) to oversee our moral and legal obligations with the handling of Personal Data. If you have any questions about this document or how we handle personal information, please contact our Data Protection Officer. If you have a concern about the way we are collecting or using personal data, we request that you raise your concern with us in the first instance.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

You can contact the school by email, letter or telephone. The contact details are set out below. To help us process your request within expected legal timescales, please clearly mark any correspondence "DATA PROTECTION OFFICER" (in CAPITALS please).

DATA PROTECTION OFFICER The Bishop's Stortford High School Beaumont Avenue Bishop's Stortford Hertfordshire CM23 4SH UK	Email: dpo@tbshs.org Telephone: +44 (0) 1279 868686
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Glossary of Terms

Biometric Data	Personal Data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics which allow or confirm the unique identification of that person, such as fingerprints.
Consent	Any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which they, by a statement or by a clear affirmative action, signify agreement to the Processing of Personal Data relating to them.
Data Controller	Exercises overall control over the purposes and means of the Processing of personal data.
Data Processor	Acts on behalf of, and only on the instructions of, the relevant Controller.
Data Protection Officer (DPO)	Monitors internal compliance of an organisation, informs and advises on data protection obligations.
Data Subject	Data Subjects for the purpose of this policy include all living individuals about whom we hold Personal Data.
Data User	Data Users include employees, volunteers, governors whose work involves using Personal Data.
Information Commissioner's Office (ICO)	Independent public body responsible for ensuring compliance with the UK's data protection regulations by providing guidance, investigating breaches of the regulations and dealing with complaints.
Parent	Parent has the meaning given in the Education Act 1996 and includes any person having parental responsibility or care of a child.
Personal Data	Any information relating to an identified or identifiable natural person, which could be as simple as a name

	or a number, or which could include other identifiers e.g. date of birth, photo, IP address etc.
Personal Data Breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data.
Privacy by Design	Implementing appropriate technical and organisational measures in an effective manner to ensure compliance with the GDPR.
Processing	Any operation which is performed on Personal Data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, erasure or destruction.
Special Category Data	Personal Data revealing or concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data (where used for identification purposes), health and sexual orientation.
Subject Access Request (SAR)	A formal request from a data subject for information, including Personal Data, which an organisation holds about them.

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Our normal method of publication is via the School's Website - <https://www.tbshs.org> .

Document Control

<u>Date modified</u>	<u>Description of modification</u>	<u>Modified by</u>
2018-05-25	Major Version 001a (Based on Hertfordshire For Learning format)	AJO
2020-12-01	Added: Covid19 / Track and Trace	AJO
2023-10-08	Removed: Covid19 / Track and Trace	AJO
2024-09-02	Major Version 002a (New School address and various HFL updates)	AJO
2024-12-30	Minor Version 002b (Minor amendments for new School site)	AJO
2025-02-28	Minor Version 002c (Minor amendments for new School site)	AJO
2025-03-24	Minor Version 002d (Minor amendments for new School site)	AJO
2025-06-30	Minor Version 002e (Minor amendments for new School site)	AJO
2025-10-04	Minor Version 002f (Check against Hertfordshire For Learning format)	AJO
2025-10-10	Major Version 003a (Annual Review - Fast Technology Advancements/JCQ)	AJO
2026-02-19	Minor Version 003b (Minor amendment - Dates)	AJO
2026-03-04	Minor Version 003c (Further standardisation of formatting)	AJO
2026-06-12	Major Version 004a (Grooming Gang Inquiry data retention / DPO correction)	AJO
2026-07-29	Major Version 005a (Annual Review / Footer Change / Iris Connect Removal)	AJO