

Privacy notice: How we use personal information in respect of governors

Date: reviewed Spring 2026; next review 2028

This privacy notice explains how we handle personal information for school governors and trustees. It is designed to be transparent about our data collection practices in line with relevant laws and reflects our commitment to protecting your privacy.

The relevant legislation governing data privacy in the UK is:

- The Data Protection Act 2018
- The UK General Data Protection Regulation (UK GDPR)
- The Data (use and Access) Act 2025 (DUUA)

The categories of governance information that we process

The categories of governance information that we process include:

- personal identifiers, contacts and characteristics (such as name, date of birth, address and other contact details, emergency contacts)
- DBS disclosure record (to include DBS number)
- governance details (such as role, start and end dates)
- personal/business interests
- training courses attended

Why we collect and use information about governors

The personal data collected is essential in order for Sphere Federation to fulfil its official functions and meet legal requirements. We collect and use governance information for the following purposes:

- to meet the statutory duties placed upon us
- to communicate effectively with governors/trustees
- to safeguard in the event of emergency
- to maintain a profile of training and professional competencies

Legal bases for processing

Under the UK General Data Protection Regulation (UK GDPR), the legal bases we rely on for processing pupil information are:

- 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
- Article 9 (2)(a): the data subject has given explicit consent to the processing of those personal data for one or more specified purposes
- Article 9 (2)(c): to protect the vital interests of the individual

Collecting governance Information

We may collect personal information via governor contact forms and data verification exercises undertaken periodically. Governance roles data is essential for operational use. While the majority of personal information you provide to us is mandatory, some 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.

Storing information about governors

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 the Data Map, also referred to as the Record of Processing Authority (RoPA) and the [Information and Records Management \(IRMS\) Toolkit for Schools](#).

Who we share governance information with

We routinely share this information with:

- Local Authority (LA)

- Department for Education (DfE)
- Diocese
- service providers, such as IT support and human resources, as the need arises

This list is not exhaustive.

Why we share governance information

We do not share information about individuals in governance roles with anyone without consent unless the law and our policies allow us to do so. The DfE collects personal data from educational providers and local authorities. We are required to share information about individuals in governance roles with the DfE under section 538 of the Education Act 1996.

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 the Sphere Federation Resources Manager:

srm@@spherefederation.org

Your rights include the right to:

- access information about you that we hold
- have your personal data rectified if it is inaccurate or incomplete
- request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- ask us to restrict processing or object to processing

Withdrawal of consent

Where we process your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the Head of Federation: hof@spherefederation.org

Complaints

If you wish to raise a complaint about how the school manages your personal data, please refer to our Data Protection Policy for further information on the complaints process.

Contact

If you would like to discuss anything in this privacy notice, please contact our Data Protection Officer:

DPO@bywaterkent.co.uk