



The Crypt School Data Privacy Notice for School Governors and Volunteers

The Crypt School is the Data Controller for the use of personal data in this privacy notice

This notice summarises why we collect personal data about individuals working with the school in a voluntary capacity, including School Governors; how we use that data; and your rights in relation to the personal data the School holds about you. "Personal data" means data that relates to a living individual who can be identified. It includes names, addresses and other contact details, photographs, identification numbers or online identifiers and location data.

The Crypt School is the data controller of the personal information you provide to us. This means the School determines the purposes for which, and the manner in which, any personal data is to be processed. In some cases, your data will be outsourced to a third party processor.

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by the School's employees and service providers in the performance of their duties.

The Crypt School's Data Protection Officer is Gloucestershire County Council. Their role is to oversee and monitor the School's data protection procedures, and to ensure that they are compliant with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018. Their contact details are schoolsdpo@gloucestershire.gov.uk

What data is collected?

The personal data we hold

The personal data that we may collect, use, store and share (where appropriate) about you includes, but is not restricted to:

- Contact details and contact preferences
- Date of birth, nationality, marital status and gender

- Special categories of more sensitive personal data, including personal characteristics such as ethnicity and health information (including disability and access requirements) and biometric data for the site security and cashless catering payment systems
- References
- Documents to support an Enhanced Disclosure and Barring Service application, such as copies of Passports, Bank statements, Birth and Marriage Certificates
- Evidence of qualifications
- Employment/employer details and your/your family's interests declared on the Trust's register of interests
- Governance details (such as role, start and end dates, attendance)
- Photographs
- CCTV images captured in school

Use of your personal data for filtering and monitoring purposes

School systems and users are protected by security, filtering and monitoring services. Your use of school devices and systems (including the school Wi-Fi), regardless of time, location or connection, including encrypted content, can be monitored and/or viewed by the relevant authorized staff members. Activity on school accounts on any device may be viewed by the relevant authorized staff. All devices using the school Wi-Fi connection for internet access, and off-site school-owned devices, may be filtered. (This does not apply to the Guest Wi-Fi service). We do this so that we can:

- Comply with *Keeping Children Safe in Education*, health and safety and other legal obligations
- Comply with our policies
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)

Why we do we collect and use information about you?

The purpose of processing your data is to help us run the school, including to:

- a) Establish and maintain effective governance
- b) Keep children and staff safe while they are at school
- c) Meet statutory obligations for publishing and sharing Governor details
- d) Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- e) Identify you and safely evacuate the school in the event of an emergency
- f) Enable equalities monitoring
- g) Ensure that appropriate access arrangements can be provided for volunteers who require them

Our lawful basis for using this data

The lawful bases we rely on for processing your information are:

- “Public task” – processing the data is necessary to carry out our requirements and responsibilities as a school
- “Vital interests” – the processing is necessary to protect someone’s life
- “Legal obligation” – to satisfy our legal obligations and fulfil statutory duties
- Consent – you have given clear consent to process your personal data for a specific purpose

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the School’s use of your data.

Our basis for using special category data

For ‘special category’ data (more sensitive personal information), we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your information in a certain way
- We need to use your information under employment, social security or social protection law
- We need to protect an individual’s vital interests (i.e. protect your life or someone else’s life), in situations where you’re physically or legally incapable of giving consent
- The information has already been made obviously public by you
- We need to use it to make or defend against legal claims
- We need to use it for reasons of substantial public interest as defined in legislation
- We need to use it for health or social care purposes, and it is used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for public health reasons, and it’s used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the use is in the public interest.

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law.

Collecting this information

While most information we collect from you is mandatory, there is some information that you can choose whether to provide it to us.

Whenever we seek to collect information from you, we will make it clear whether you must provide this information or you have a choice. Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how to withdraw consent if you wish to do so (you may also email the Compliance Officer at foi@crypt.gloucs.sch.uk to do this).

How we store this data

We hold your data securely either on our school network, external servers (cloud storage) or insecure physical locations. Offices containing secure data have restricted access. We also make sure that people only have access to data that they need for their job and not necessarily everything we hold about you. Access to any sensitive personal data is strictly restricted to only those who need to see it.

We keep volunteers' data securely for the set amount of time shown in our Records Retention Schedule, which is available on request. This sets out the time period for which different categories of data are kept and ensure that personal information is not kept for longer than necessary. We use a company with special authorisation to destroy paper records of personal data.

Data sharing

We do not share information about you with any third party without your 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:

- Government Departments or Agencies (including Department for Education, Education and Skills Funding Agency, Companies House), including to meet our legal obligations to share information about school Governors (see Annex)
- Our local authority, Gloucestershire County Council – to meet our legal obligations to share certain information about staff and volunteers attending residential trips
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as Governor/Volunteer training
- Professional advisers and consultants
- Police forces, courts

Transferring data internationally

Where we transfer personal data to another country or territory, we will do so in accordance with data protection law.

Requesting access to your personal data

Under data protection law, you have the right to request access to information about you that we hold. To make a request for your personal information, we ask that you do so in writing on a Data Subject Access Request form, which is available on the School website (Policies and Forms) or from the School Office. Submitting your request using the form enables us to process your request more efficiently, but you may also make a request verbally or by email, for example.

Depending on the lawful basis above, you also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'
- the right to ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request, data subject access request or right of access request
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'
- the 'right to object to processing' of your information, in certain circumstances
- rights in relation to automated decision making and profiling (*The Crypt School does not take any decisions or conduct profiling by automated means*)
- the right to withdraw consent at any time (where relevant)
- the right to complain to the Information Commissioner if you feel we have not used your information in the right way.
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There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it.

Contact us

If you have any questions or concerns about the way we are collecting or using your personal data, we request that you raise this with us in the first instance by contacting the Compliance Officer (foi@crypt.gloucs.sch.uk).

Alternatively, you can contact the School's Data Protection Officer at:

Gloucestershire County Council, School's Data Protection Team, Information Management Service, Shire Hall, Westgate Street, Gloucester GL1 2TG (tel 01452 583619 or email schoolsdpo@gloucestershire.gov.uk).

Should you wish to, you may make a complaint to the Information Commissioner's Office at <https://ico.org.uk/global/contact-us/contact-us-public/>

Last reviewed March 2026

Annex: How Government uses governor data

The governor data that we lawfully share with the DfE via GIAS (Get Information About Schools):

- 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

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 publicly 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.