

# Governor Uses of Personal Data Advice Note

2020

*Do everything without complaining or arguing.  
(Philippians 2:4)*

The owner of this document is the Headteacher. All requests for change should be directed to them. Any printed copies of this document are for reference only; the definitive version is the computer file held on the school office administrator's computer.

*Revision history*

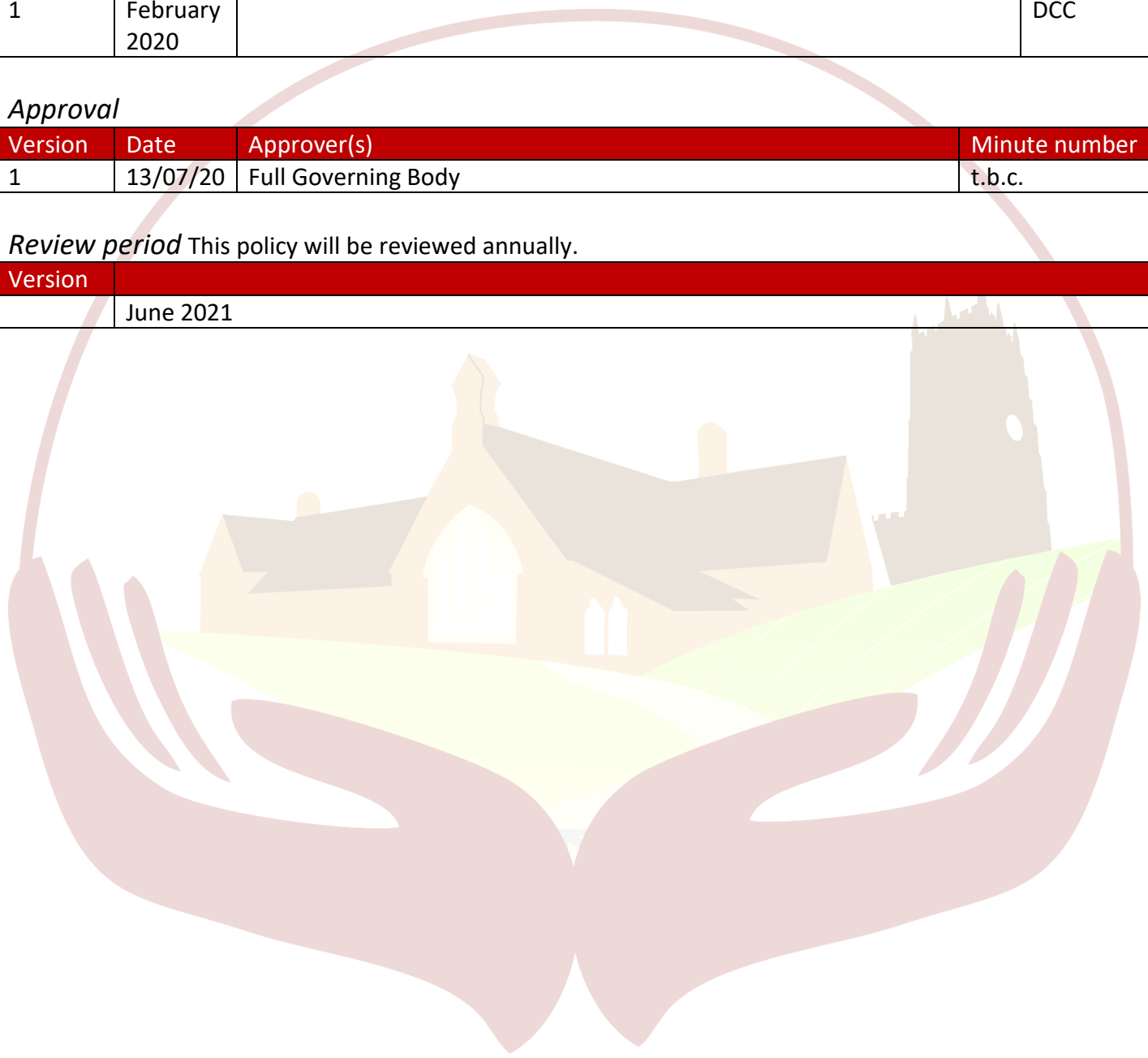
Version	Date	Changes	Author(s)
1	February 2020		DCC

*Approval*

Version	Date	Approver(s)	Minute number
1	13/07/20	Full Governing Body	t.b.c.

*Review period* This policy will be reviewed annually.

Version	
	June 2021



Governors generally deal with only aggregate data and many of the documents that may be downloaded from the Governor portal/sent by email to Governors are semi-public documents. Many Governing Bodies are now almost entirely paperless, where all communication is made by email and documents uploaded to a portal.

However, there are occasions where Governors may be party to communications of a very sensitive nature and personal data of individuals is discussed. These include:

- Pupil exclusions
- Parent complaints
- Staff recruitment
- Staff disciplinary
- Staff salary decisions
- Whistleblowing
- Critical incidents

Documents relating to these may be uploaded to the Governor Portal (e.g. Governor Hub or other Cloud services) or sent by email. Many schools use alternative methods in these instances (e.g. require Governors to view paper documents in school) but it can be easily forgotten in a busy day to ensure the right amount of confidentiality- especially in urgent situations that require quick communication.

### **Personal email addresses**

School email accounts are usually set up with the ability to encrypt and protect emails and we check/advice schools to make use of this function. Private email addresses don't always have this function.

In the event of a data breach, use of a school email address can help to make that breach containable e.g. by locking an email account.

If there is a Subject Access Request (we find these often come out of the sort of events listed above that generally have Governor input) the school must be satisfied that it is able to search all systems for data. This may include searching emails sent by Governors. Again, the use of a school email address makes this easier.

It is always for the individual school to make the decision about whether Governors should use school email addresses. It would be a case of weighing up the risk/benefits. We do find that most schools have Governor email addresses. The School Business Officer (SBO)/Headteacher(HT) tend to send emails to Governor personal email addresses advising them to logon to their school email, which seems to be a good workaround the situation.

### **Use of own devices**

Governors will almost certainly use their own devices to access school email/Cloud based school storage. Governors should ensure that these devices are not set to auto-save passwords, that

appropriate security is used (e.g. phones have password/pin/fingerprint unlock facility) and that documents that are downloaded (e.g. attachments to emails) are wiped from the Downloads folder of the device as soon as possible. Schools should ensure Governors receive/acknowledge receipt of related Data Protection Policies (e.g. IT Acceptable Usage, Data Protection Policy). When a Governor reaches the end of a term of office, access to the relevant systems should be revoked and Governors should sign to confirm that any copies of documents, paper or electronic, are no longer in their possession.

