



Governor privacy notice

Introduction

Under the General Data Protection Regulation (GDPR) we are obliged to inform you of the information we hold on you, as governors, what we use it for, who we share it with, and for how long we keep it. This privacy notice (also known as a fair processing notice) aims to provide you with this information. If it, or any information linked to it, is unclear, please contact the school office, or the school's Data Protection Officer (DPO).

We, St Aidan's VC C of E Primary School, are the Data Controller for the purposes of data protection law. We have appointed David Coy as our Data Protection Officer (DPO). He can be contacted by email: david.coy@london.anglican.org

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1 Data held

The categories of information we collect, hold and share may include, but are not limited to:

- personal information – eg. name, contact details (address, telephone numbers, email addresses), National insurance number);
- details of qualifications, skills, and experience – for skills audit purposes;
- your business or other charitable interests;
- bank account details – for reimbursement of expenses;
- information about any criminal record;
- details of your appointment, including the appointing body, the date of appointment and term of office;
- training attended in your role as a governor;
- attendance at meetings and visits to the school in your role as a governor;
- special roles or leadership responsibilities you hold within the governing body;
- equal opportunities monitoring information – eg. ethnic origin, sexual orientation, health and religion or belief (where this has been provided);
- photographs – for internal safeguarding and security purposes, school newsletters, media and promotional purposes);
- CCTV images.

1.1 We may also hold personal data about you from third parties, such as information supplied by the appointing body and from the Disclosure & Barring Service, in order to comply with our legal obligations and statutory guidance.

2 Reasons for data collection

The purpose of collecting and processing this data is to:

- enable you to serve as a governor;
- comply with our statutory safeguarding obligations;
- ensure we comply with our Instrument of Governance;
- support effective governor development;
- support effective management of the school;
- comply with statutory reporting to the Department for Education (DfE);
- enable equalities monitoring and reporting;
- respond to any governance issues;
- support the work of the School Teachers' Review Body;
- assess the quality of our services;
- comply with the law regarding data sharing.

3 Lawful basis

Our lawful basis for collecting and processing governor information is defined under Article 6, and the following sub-paragraphs in the GDPR apply.

- Data subject gives consent for one or more specific purposes.
- Processing is necessary for the purposes of the legitimate interests assumed by the controller or a third party following a legitimate interest assessment.
- Processing is necessary to protect the vital interests of the data subject.
- Processing is necessary for tasks in the public interest or exercise of authority vested in the controller (the provision of education).

- 3.1 Information is also further defined under Article 9, in that some of the information we process is deemed to be sensitive, or special, information, in which case the following sub-paragraphs in the GDPR apply.
- The data subject has given explicit consent;
 - It is necessary to fulfil the obligations of controller or of data subject;
 - Processing is carried out by a foundation or not-for-profit organisation (includes religious, political or philosophical organisations and trade unions);
 - It is in the public interest.
- 3.2 Some of the reasons listed above for collecting and using personal data overlap, and there may be several grounds which justify our use of the data.

4 Collecting governor information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the GDPR, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

- 4.1 Where we have obtained consent to use governors' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how it can be withdrawn.

5 Storing your data

We create and maintain a file for each governing body member. The information contained in this file is kept secure and is only used for purposes directly relevant to your term as a governor at the school. Once your term(s) of office with us has ended, we will retain this file but delete the information in it in accordance with our retention policy. We currently hold data according to the Information and Records Management Society's toolkit for schools.

- 5.1 We have data protection policies and procedures in place, including strong organisational and technical measures, which are regularly reviewed.

6 Who we share information with

We routinely share information with appropriate third parties, including:

- our local authority – to meet our legal obligations to share certain information with it,;
 - the DfE - to meet our legal obligations to share certain information with it;
 - Ofsted;
 - our auditors, to ensure our compliance with our legal obligations;
 - professional advisers and consultants – to maintain high quality of public service provision;
 - police forces, courts, tribunals.
- 6.1 Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.



7 Why we share your information

We share personal data with the DfE on a statutory basis. Under s.538 of the Education Act (1996) and the Academies Financial Handbook, the Secretary of State requires boards to provide certain details they hold about people involved in governance, as volunteered by individuals, and the information kept up to date.

- 7.1 We do not share personal information with anyone without consent, unless the law and our policies allow us to do so.

8 Data collection requirements:

The DfE collects and processes personal data relating to those governing schools (including Single and Multi Academy Trusts). All schools are required to ensure they keep their governors details up to date under s.538 of the Education Act (1996) and the Academies Financial Handbook.

- 8.1 To find out more about the data collection requirements placed on us by the DfE including the data that we share with them, go to:
<https://www.gov.uk/education/data-collection-and-censuses-for-schools>.
- 8.2 For more information about the DfE's data sharing process, please visit:
<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>.
- 8.3 To contact the DfE: <https://www.gov.uk/contact-dfe>

9 Your data protection rights

Under data protection legislation, governors have the right to request access to information about them that we hold, through a Subject Access Request.

- 9.1 If you make a subject access request (and if we do hold information about you) we will:
- give you a description of it;
 - tell you why we are holding it, processing it and how long we will keep it for;
 - explain where we got it from, if not from you;
 - tell you who it has been, or will be, shared with;
 - let you know whether any automated decision-making is being applied to the data, and any consequences of this;
 - give you a copy of the information in an intelligible form.
- 9.2 Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.
- 9.3 Subject access requests should be made, in the first instance, to the school administrator.
- 9.4 You also have the right to:
- object to processing of personal data that is likely to cause, or is causing, damage or distress;
 - prevent processing for the purpose of direct marketing;
 - object to decisions being taken by automated means;
 - in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed;



- claim compensation for damages caused by a breach of the Data Protection regulations.

10 Concerns and complaints

We take all concerns and complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

10.1 To make a complaint, please contact our DPO. Alternatively, you can make a complaint to the Information Commissioner's Office:

- Online: <https://ico.org.uk/concerns/>.
- By telephone: 0303 123 1113.
- By post to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

11 Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our DPO, David Coy, (E: david.coy@london.anglican.org) or Headteacher, Kate Stevens.

12 Monitoring and review

This privacy notice will be reviewed every two years, or earlier if the need arises, by the Care and Communication committee in collaboration with the DPO.

Date of policy: MAY 2023

Policy ratified: (Signature) 15th May 2023 (Date)

Review due: MAY 2025