

Privacy Notice – Governors



Data Controller: Archbishop Temple Multi Academy Trust

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Introduction

The trust must collect and process personal information (data) about you when you are appointed as a governor to meet our statutory and operational obligations as an education provider. This privacy notice outlines what data we collect about you, why we need it and how it is used.

The trust process all personal data in accordance with the UK General Data Protection Regulation (UK-GDPR) and Data Protection Act (2018).

You may also wish to review our '**visitor privacy notice**' for further information about how and why we use your data when you attend trust sites.

Data Controller

The trust is the 'Data Controller' for the personal information that we process about you. This means that we are responsible for your data and make decisions on how it is used.

Data Protection Officer

The trust has appointed a Data Protection Officer (DPO) who is responsible for overseeing compliance with the relevant data protection legislation. Our DPO provides support to the trust and acts as the first point of contact for any questions or queries regarding data protection.

Our DPO is Miss Danielle Eadie from RADCaT Ltd who is supported by the senior leadership team at the trust. The DPO is contactable via the trust office in the first instance.

What personal data do we process?

When you apply for a position and are inducted as a governor at the trust, we will require some basic details to identify and correspond with you and provide you with the necessary resources to perform your duties:

- Full Name
- Date of Birth
- Address
- Contact Details (inc emergency contact details)
- Gender
- Ethnicity

To comply with our safeguarding obligations, we will perform a DBS check on you; whilst we will not keep a copy of your certificate, we will maintain a log of the reference number and date and time of check. We will also need to review your identification as part of this process.

As an education provider, the Department for Education (DfE) require us to collect and record the following personal data:

- Role
- Governor ID
- Dates & Means of Appointment
- Declaration of Pecuniary and Personal Interests
- Meeting Records (Agendas, Minutes etc)

We must publish a basic profile of you and your role for transparency on the trust website. You will also have a public profile on the DfE's 'Get Information About Schools' website. This is limited to your name, governor identification number, means and dates of appointment.

The following general information will be processed to fulfil our operational duties:

- CCTV imagery if you visit the trust site
- System usage data when you access the software needed to perform your role
- General training and professional development that you partake in

We must also collate the following records about you to fulfil our legal obligations:

Health & Safety

- Logs of your visit to site in the event that an incident occurs requiring evacuation
- Accident and injury records
- Disclosures that you make to us regarding any disabilities or health & wellbeing concerns that may impact your role and require reasonable adjustments

Safeguarding

Along with your vetting checks, we will keep records related to the following:

- Statutory safeguarding and related training
- Any safeguarding or whistleblowing concerns that you are party to

Monitoring

To keep our pupils and other members of the community safe, the trust partake in some monitoring activities that require the processing of your personal data:

CCTV

Closed Circuit Television (CCTV) is in place to maintain security and for the purposes of crime prevention & detection; we may also use the system to investigate and evidence any instances of inappropriate behaviour from pupils, staff and others on trust sites.

Access to the CCTV systems is strictly limited to a select few staff; we do not monitor the system and only review footage if we are notified of an incident. Please contact the trust for a copy of our CCTV Policy for further information.

Internet & Digital Usage Data

Safeguarding legislation encourages us to monitor our internet and digital system usage to prevent against any inappropriate use that may put pupils and other users at risk.

The trust has an internet filtering and monitoring system that notifies the relevant staff member if any user accesses an inappropriate website or makes a search for a prohibited term. The trust may also review your usage of any software that we provide you with access to for your role if we are notified of an instance of inappropriate use.

Where we get your information?

Most of the personal information that we process is provided directly by you upon induction to your role. Further information will be collated by the trust as your role with us progresses for instance, meeting minutes and attendance.

We receive a small amount of information about you from third parties, this is typically limited to the results of your DBS check and other third-party service providers such as ICT and training providers.

Whilst most of the information that we process is mandatory, we will inform you if there are any data processing activities that are optional and seek your permission where necessary.

Our lawful basis for processing your personal data?

The UK-GDPR requires us to meet a lawful basis (condition) to process your personal data; you can find out more here:

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/a-guide-to-lawful-basis/>

We primarily process your personal data as we have a **legal obligation** to do so (it is required by law) or we are doing so in the performance of a **public task** when fulfilling our statutory obligations as a public authority and education provider.

Those in the education sector have a legal duty to provide governance information as part of the following statutory regulations:

- Section 538 of The Education Act (1996)

As part of these statutory regulations, general information about you and your role is published by the Department for Education (DfE) on their 'Get Information about Schools' (GIAS) website:

<https://get-information-schools.service.gov.uk/>

We must also publicise information about you and your role on our trust websites:

<https://www.gov.uk/guidance/what-academies-free-schools-and-colleges-should-publish-online>

Along with the aforementioned statutory obligations, some of your data is required to fulfil our duties under the following legislation:

- Health & Safety at Work Act (1974): accident & injuries, health and wellbeing etc
- Keeping Children Safe in Education (2026): vetting checks & safeguarding concerns etc
- Freedom of Information Act (2000): governor meeting minutes & agendas etc
- Equality Act (2010): gender, ethnicity, disabilities etc to ensure equality of opportunity & treatment

Special Category Data

Information about you that is more sensitive in nature is referred to as '**special category data**' under the UK-GDPR. Examples include information about your health & wellbeing and special characteristics such as your gender and ethnicity. The trust is required to process such data in certain circumstances and when doing so, we need to ensure that we meet a further lawful basis from the UK-GDPR.

For the most part, the trust will rely upon one of the following lawful bases depending on the circumstances:

- Data is processed in the field of **employment, social security and social protection**.
- Data is processed for reasons of **substantial public interest**.
- There is a **vital interest** in processing your data to protect or save the life of you or another.

- Data is processed as part of **legal claims or judicial acts**.
- We have sought your **explicit (written) consent** to process your special category data.

Further lawful bases to process your data

When providing you with access to systems and fulfilling your general training requirements, the trust has a **contractual obligation** to process your personal data; we are providing you with resources to fulfil your duties.

In the event that an accident or incident occurs that involves you, we may be required to process your personal data in the act of protecting or saving your life or that of another person; we have a **vital interest** to process your personal data.

Who we share your personal information with and why?

The trust will only share your personal data if it is required to meet a legal or an operational duty relating to your role as governor.

We **must** share some of your personal data with the DfE to meet our duties under the aforementioned statutory legislation. **Appendix 1** provides further information on how the DfE use your personal data.

We **may** also share your data with the following parties if you are involved in or the subject of an accident or incident:

- Local Authority
- Police
- Emergency Services
- Governing Bodies (HSE, ICO etc)
- Professional Advisors
- Insurance Provider
- Courts

As part of our routine operations, we will share your data with the following third-party providers of key services:

- ICT to create and manage your trust email account and access to the relevant areas of the network.
- DBS check provider to meet our safeguarding obligations
- Governor information management system to set up an account and provide access to the information and resources needed to perform your duties
- Clerking service providers to ensure governance records are effectively managed
- Auditors to ensure that the trust is compliant and meets best practice standards

The trust perform strict checks on those third parties with whom we share your data to ensure they are complaint with data protection legislation and meet the same high standards of security as expected by ourselves.

If we must share data, we take a minimalist approach to ensure only the necessary amount of information is provided. Data will not be transferred unless there is a secure method of exchange.

Public Information & Freedom of Information

As a public authority, the trust must share some personal information about you and your role publicly on our website to support transparency in our decision making. This is a requirement placed upon us by the DfE:

<https://www.gov.uk/guidance/what-academies-free-schools-and-colleges-should-publish-online>

Some of your personal data may also be included in records that are subject to the Freedom of Information Act (FOIA) (2000) which requires the trust, as a public authority to:

- Publish certain information about the trust that is deemed in the public interest
- Respond to requests for information about the trust that is deemed in the public interest

This is likely to include publishing your general governor profile online and publishing / providing meeting minutes that may contain your name (usually initialled). You can find out more about our obligations under the FOIA by visiting the trust website for a copy of our '**FOIA Policy**'.

Data Sharing – Subject Access Requests

From time to time, the trust may receive requests from staff, pupils and parents to access records as part of a subject access request (UK-GDPR). In some cases, personal identifiers relating to governors will be present within staff and pupil records; a name, role, email address etc.

Such information will not usually be redacted as part of a subject access request if it was collated in your professional capacity as a governor. The trust will however assess each request on a case by case basis to account for scenarios in which disclosure may pose a risk.

Do we transfer your data internationally?

We do not routinely transfer your personal data outside of the United Kingdom (UK). If a situation arises whereby we must do so, the trust will ensure that the transfer is compliant with the UK-GDPR's rules on international data processing and is sent via secure methods.

How we store and how long we keep your personal information?

To comply with the UK-GDPR, the trust only keep personal data for as long as necessary to meet our legal and operational duties.

Our 'Records Management Policy & Retention Schedule' (available upon request) outlines how long records are kept and how we determine and manage these periods. As a rule of thumb, general information about you is kept for up to 6years once your appointed role ceases whilst key meeting minutes and documentation are typically kept for the life of the trust. We will remove your public profile once your role with us ceases.

Your personal data is stored securely on site. Records kept in electronic format are stored securely on carefully selected databases and systems that are fully encrypted with password protection and two factor authentication utilised where available. Any physical records are kept in locked cabinets within locked offices and archive rooms; key access is strictly limited depending upon role.

Staff and those third parties accessing key records are subject to DBS checks and strict confidentiality agreements.

What are your rights?

Under the UK-GDPR, you have a right to access the personal data that we hold about you by making a subject access request (SAR). If you make a SAR and we do process the data you have requested access to, we will:

- Give you a description of it.
- Explain why we are processing it and how long we will hold it.
- Explain where we collected the data if not from you.
- Outline if the data has been or will be shared with any other parties.
- Inform you if any automated decision making has been applied to the data and provide any consequences of this.
- Provide you with a copy of the data in an intelligible form.

Along with the right to access your personal data, you also have the following rights under the UK-GDPR:

- The right to ask us to rectify any personal information you feel is inaccurate or incomplete.
- The right to ask us to erase your personal data in certain circumstances.
- The right to ask us to restrict the processing of your personal data in circumstances.
- The right to object to the processing of your personal data in certain circumstances
- The right to ask us to transfer the personal data you provided to another organisation in certain circumstances.

If you would like to exercise any of your rights, please contact the trust office in the first instance.

A response will be provided to you within one calendar month. The trust reserves the right to extend the response time by a further two calendar months if your request is complex, we will however inform you of any intention to extend within the first month.

Complaints

All individuals have the right to complain if there are any concerns surrounding the use of their personal data.

We ask that any questions or concerns are brought to our attention in the first instance to provide us with the opportunity to resolve any issues. The trust will acknowledge any complaints within 30 days; a response will be provided without undue delay.

In the event that the trust is unable to resolve your complaint, you have the right to escalate your complaint to the Information Commissioners Office (ICO): <https://www.ico.org.uk>

Appendix 1: How the government uses your information

The governance data that we lawfully share with the Department for Education (DfE) via GIAS will:

- increase the transparency of governance arrangements.
- enable local authority-maintained schools, academies, academy trusts and the Department for Education (DfE) to identify more quickly and accurately individuals who are involved in governance and who govern in more than one context.
- allow the Department for Education (DfE) 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.

Data collection requirements

To find out more about the requirements placed on us by the Department for Education (DfE) including the data that we share with them, go to <https://www.gov.uk/government/news/national-database-of-governors>

Some of these personal data items are not publicly available and are encrypted within the GIAS system. Access is restricted to authorised Department for Education (DfE) and education establishment users with a Department for Education (DfE) Sign-in (DSI) account 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 for Education (DfE) unless the law allows it.

How to find out what personal information the Department for Education (DfE) hold about you:

Under the terms of the [Data Protection Act 2018](#), you're entitled to ask the Department for Education (DfE):

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to

- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department for Education (DfE), you should make a subject access request (SAR). Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

To contact DfE: <https://www.gov.uk/contact-dfe>