

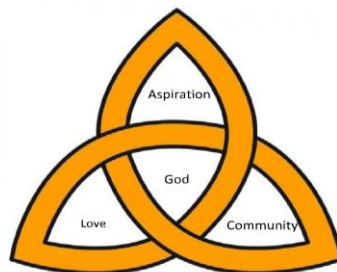
## Privacy Notice - Governor & Volunteers

### Vision

Our vision is that children are nurtured to love learning, love one another and love God.

***'Love learning, love one another, love God.'***

Love the Lord your God with all your heart, soul, mind and strength and love your neighbour as yourself (Mark 12)



Policy drafted by: April Owens

Agreed by governing body: Spring 2021

Review: Spring 2023

# How we use Governor and other Volunteers Information

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals working with the school in a **voluntary** capacity, including **Governors**.

We, Holy Trinity CE Primary School, (the School) are the 'Data controller' for the purposes of data protection law.

We have appointed Grow Education Partners Ltd as our data protection officer (DPO and the responsible contact is David Coy) (see 'Contact us' below).

## 1. The Personal Data we hold

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not limited to:

- Personal Information (such as name, date of birth, national insurance number, next of kin, dependents, marital status)
- Contact details (such as telephone number, email address, postal address, for you and your emergency contacts)
- Protected characteristics (such as trade union membership, nationality, language, ethnic origin, sexual orientation, health and religion or belief. Where this has been provided)
- Relevant Medical information (such as physical or mental health conditions, including for any disabilities which the organisation needs to make any reasonable adjustments to fulfil its duty of care)
- Qualifications, and employment records, (such as work history, job titles, references, training records and professional memberships)
- Outcomes of any disciplinary and/or grievance procedures, including any warning issues to you and related correspondence.
- Governor performance information (Such as attendance, visits, roles, and leadership responsibilities)
- Information about business and pecuniary interests
- Information about your criminal record
- Close Circuit Television (CCTV) footage
- Data about your use of the school's information and communications system
- Photographs (for internal safeguarding & security purposes, school newsletters, media, and promotional purposes).
- Payment and banking details where required.

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.

A full breakdown of the information we collect on volunteers can be found in the record of data processing which can be requested from April Owens Finance Officer [aowens@htprimary.com](mailto:aowens@htprimary.com)

## **2. Why we collect and use this information**

We collect and process this data which includes but is not limited to:

- Establish and maintain effective governance
- Meet statutory obligations for publishing and sharing voluntary individuals' details
- Facilitate safeguarding as part of our safeguarding obligations towards pupils
- Fulfil our legal obligations in appointing voluntary individuals
- Support development
- Equalities monitoring and reporting
- Ensure that appropriate access arrangements can be provided for volunteers who require them
- To comply with the law regarding data sharing
- Respond to any school workforce issues
- Undertake statutory reporting the Department for Education

## **3. The lawful basis on which we use this information**

Are defined under data protection legislation and for personally identifiable information are;

- Fulfil a contract with you
- Data subject gives consent for one or more specific purposes.
- Processing is necessary to comply with the legal obligations of the controller.
- 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).
- Processing is necessary for your legitimate interests or the legitimate interests of a third party.

When we process special category information, which is deemed to be more sensitive, the following lawful basis are used.

- The data subject has given explicit consent.
- Employment, social security, and social protection
- It is necessary to fulfil the obligations of controller or of data subject.
- It is necessary to protect the vital interests of the data subject.
- Processing is carried out by a foundation or not-for-profit organisation (includes religious, political, or philosophical organisations and trade unions)
- Reasons of public interest around public health

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

#### **4. Collecting this information**

While the majority of the information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

#### **5. Storing your data**

Personal data is stored in accordance with our data retention policy.

We maintain a file to store personal information about all volunteers. The information contained in this file is kept secure and is only used for purposes directly relevant to your work with the school.

When your relationship with the school has ended, we will retain and dispose of your personal information in accordance with our Data Retention Schedule. A copy of this can be found at Holy Trinity CE Primary School.

#### **6. Who we share information with**

In order for us to legally, effectively and efficiently function we are required to share data with appropriate third parties, including but not limited to:

- The Department for Education- to meet our legal obligations to share certain information.
- Our local authority – to meet our legal obligations to share certain information with it, such as details of governors
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as governor support and IT.
- Training centres and awarding bodies-in order to provide information and feedback on your performance.
- Your families and representatives- such as in the event of an emergency
- Our auditors to ensure compliance with our legal obligations
- Trade Unions and Professional Associations - to enable them to provide the service their members require
- Professional advisers and consultants- for us to develop our services and best provide our public service Employment & recruitment agencies and future employers to support reference request
- Police forces, courts, tribunals, Security organisations- to create a secure workplace for all at the school.
- Charities and voluntary organisations

#### **7. Transferring data internationally**

We may send your information to other countries where:

- we or a company we work with store information on computer servers based overseas; or
- we communicate with you when you are overseas

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here:

[http://ec.europa.eu/justice/data-protection/internationaltransfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/internationaltransfers/adequacy/index_en.htm)

If the country that we are sending your information to is not on the list or, is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland) then it might not have the same level of protection for personal information as there is the UK. However, we will always conduct appropriate due diligence when any of these circumstances occur to ensure there is no undue risk to your data

## 8. Why we share your information

In order to successfully perform our key functions, we need to share personal data with organisations for example we share personal data with the Department for Education (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.

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

For more information about the department's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

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

## 9. Data Protection Rights

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

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 and 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
- NOT provide information where it compromises the privacy of others
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

In most cases, we will respond to subject access requests within 1 month, as required under data protection legislation. However, we are able to extend this period by up to 2 months for complex requests or exceptional circumstances.

### **Your Other Rights regarding your Data:**

- Withdraw their consent to processing at any time, this only relates to tasks which the school relies on consent to process the data.
- Ask us to rectify, erase or restrict processing of their personal data, or object to the processing of it in certain circumstances and where sufficient supporting evidence is supplied
- Prevent the use of their personal data for direct marketing
- Challenge processing which has been justified on the basis of public interest, official authority or legitimate interests.
- Request a copy of agreements under which their personal data is transferred outside of the European Economic Area
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect them)
- Request a cease to any processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Submit a complaint to the ICO
- Ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances)

If you would like to exercise any of the rights or requests listed above, please contact Alison Bateman

- [abateman@htprimary.com](mailto:abateman@htprimary.com)
- 0209 940 2730
- Holy Trinity Primary School, Carrington Road, Richmond TW10 5AA

The School will comply with the Data Protection legislation in regard to dealing with all data requests submitted in any format, individuals are asked to preferably submit their request in written format to assist with comprehension.

We reserve the to verify the requesters identification by asking for Photo ID, if this proves insufficient then further ID may be required.

### **10. Data Protection Breaches**

If you suspect that yours or someone else's data has been subject to unauthorised or unlawful processing, accidental loss, destruction or damage. Then we ask that you please contact Alison Bateman [abateman@htprimary.com](mailto:abateman@htprimary.com), and advise us without undue delay.

### **11. Complaints**

We take any 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.

To make a complaint, please contact our independent data protection officer, David Coy (contactable on [david.coy@london.anglican.org](mailto:david.coy@london.anglican.org), 07903 506531).

Alternatively, you can refer a complaint to the Information Commissioner's Office:

Report a concern online at <https://ico.org.uk/concerns/>

Call 0303 123 1113

Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## **12. Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact either our School Data Protection Lead, contact April Owens Finance Officer [aowens@htprimary.com](mailto:aowens@htprimary.com) or our independent Data Protection Officer, David Coy (contactable on [david.coy@london.anglican.org](mailto:david.coy@london.anglican.org), 07903 506531).