

Privacy Notice for Governors and Trustees

Under data protection law, individuals have a right to be informed about how a data controller uses any personal data held 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.

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relates to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

This privacy notice explains how we collect, store and use personal data about **Governors and Trustees**.

Who we are

Greenshaw Learning Trust is the Data Controller for the purposes of the General Data Protection Regulations (GDPR) this means it is responsible for the personal data about you. The postal address of the Trust is: Greenshaw Learning Trust, Grennell Road, Sutton, Surrey, SM1 3DY.

The Data Protection Officer for the Trust is Judicium Consulting Limited.

Contact: Craig Stilwell.

Telephone: 0203 326 9174

As a Data Controller we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of any contract of employment or other contract to provide services and we may update this notice at any time.

It is important that you read this notice with any other policies mentioned within this privacy notice, so that you understand how we are processing your information and the procedures we take to protect your personal data.

CATEGORIES OF INFORMATION WE COLLECT, PROCESS, HOLD AND SHARE

We process data relating to Governors and Trustees. Personal data that we may collect, process, hold and share (where appropriate) about you includes, but not restricted to:

- Personal information and contact details such as name, title, addresses, date of birth, marital status, phone numbers and personal email addresses;
- Emergency contact information such as names, relationship, phone numbers and email addresses;
- Criminal records information as required by law to enable you to work with children e.g. DBS checks;

- Information about business and pecuniary interests;
- Information acquired as part of your application to become a Trustee or Governor;
- Photographs for identification purposes;
- CCTV footage captured by the school;
- Video recordings captured by our video conferencing platform;
- Information about your use of our IT, communications and other monitoring systems and other monitoring information.

Particularly Sensitive Information

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Disability, health and access requirements
- Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs

Sensitive personal information (as defined under the UK GDPR as "special category data") requires higher levels of protection and further justification for collecting, storing and using this type of personal information. We may process this data in the following circumstances:

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations in line with our data protection policy;
- Where it is needed in the public interest, such as for equal opportunities monitoring;
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards. Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent.

Criminal Convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where it is necessary to carry out our legal obligations. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

WHY WE USE THIS DATA & RETENTION

We will only use your personal information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Where you have provided your consent;
- Where we need to comply with a legal obligation (such as health and safety legislation and under statutory codes of practice);
- Where it is needed in the public interest or for official purposes;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests, rights and freedoms do not override those interests.

The situations in which we will process your personal information are listed below: -

- To determine appointment and suitability as a governor;
- To comply with safeguarding obligations;

- To provide details on our website or online databases about governors;
- To communicate with third parties and other stakeholders to the school;
- For business management and planning purposes (including accounting, budgetary and health and safety purposes);
- For financial purposes (such as expenses);
- To deal with any complaints/investigations as required;
- When you sit on a panel or committee, name, and comments as well as decisions made;
- To send communications in your role as governor;
- For education, training, and development requirements;
- To review governance of the school;
- To comply with any legal dispute or any legal obligations;
- To comply with regulatory requirements or health and safety obligations;
- To ensure system security, including preventing unauthorised access to our networks;
- To monitor use of our systems to ensure compliance with our IT processes;
- To receive advice from external advisors and consultants;
- To liaise with regulatory bodies (such as the DfE, DBS); and
- Dealing with termination of your appointment.

If you fail to provide certain information when requested, we may be prevented from complying with our legal obligations (such as to ensure health and safety). Where you have provided us with consent to use your data, you may withdraw this consent at any time.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

COLLECTING THIS INFORMATION

While the majority of 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.

It is important that you read this notice, with any other policies mentioned within this privacy notice, so you understand how we are processing your information and the procedures we take to protect your personal data.

HOW WE STORE THIS DATA

Except as otherwise permitted or required by applicable law or regulation, GLT only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

Once you are no longer a Governor or Trustee we will retain and securely destroy your personal information in accordance with our data retention policy. This can be found on the GLT website.

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:

- the Department for Education (DfE);
- Ofsted;
- Schools within the Trust;
- Law enforcement officials such as police, HMRC;
- LADO;
- Professional advisors such as lawyers and consultants;
- Support services (including HR support, insurance, IT support, information security, pensions and payroll);
- Suppliers and Service Providers;
- The Local Authority; and
- DBS.

The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.

TRANSFERRING DATA INTERNATIONALLY

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.

SECURITY

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your personal information to those third parties who have a business need to know.

You can find further details of our security procedures within our Data Breach Procedure and our Cyber Security Procedure, which can be found on the GLT website.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Biometric Data

Greenshaw Learning Trust schools can use your information as part of an automated (i.e. electronically operated) recognition system. This is to allow access to the cashless catering system. The information that is used is referred to as 'biometric information'. This data will only be processed once we have obtained appropriate consent. For further information in relation to this, please see our Biometric Data Usage Procedure.

RIGHT OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Under certain circumstances by law you have the right to:

- Access your personal information (commonly known as a “subject access request”). This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it. Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances (for example for direct marketing purposes).
- To transfer your personal information to another party.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Head of Governance; headofgovernance@greenshawlearningtrust.co.uk.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

We hope that we can resolve any query you raise about our use of your information in the first instance.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by contacting us directly then you can contact the DPO on the details below:

Data Protection Officer: Judicium Consulting Limited

Address: 72 Cannon Street, London, EC4N 6AE

Email: dataservices@judicium.com

Web: www.judiciumeducation.co.uk

Lead Contact: Craig Stilwell

YOUR OTHER RIGHTS REGARDING YOUR DATA

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
 - Prevent your data being used to send direct marketing
 - Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
 - In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
 - Claim compensation for damages caused by a breach of the data protection regulations
- To exercise any of these rights, please contact our data protection officer.

CONTACT US

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact your Clerk or the GLT Head of Governance headofgovernance@greenshawlearningtrust.co.uk.

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 complaints@greenshawlearningtrust.co.uk

Alternatively, you can make 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

Last Updated

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on 16 Dec 2022.