

## **Bolton Impact Trust Members, Trustees and Governors Privacy Notice**

### **How we use school workforce 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' to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **members, trustees and governors**.

We, Bolton Impact Trust are the 'data controller' for the purposes of data protection law.

Our Data Protection Officer is Gill Smith (see 'Contact' below).

Our Director of Academy Operations is Rebecca Leonard (see 'Contact' below).

#### **The categories of information about members, governors and trustees that we collect, process, hold and share include:**

- Contact information (such as name, address, email address, telephone numbers)
- Photographs and CCTV images
- Information about terms of office (such as start and end dates, appointing body)
- Business interests, financial interests and governance roles in other schools
- Attendance information
- Training Information
- Skills Information
- Characteristics information - marital status, gender, ethnic group and equality and diversity data

#### **Where do we get your personal data from?**

We will obtain your personal data directly from you, by way of information gathering exercises at appropriate times such as on your appointment.

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

We use members', governors' and trustees' data to:

- Contact individuals with information and papers for meetings
- Share information about members, governors and trustees with the staff and pupils
- Comply with statutory obligations to publish information about the governing/trustee body
- Analyse the range of skills and training of the Local Governing Board and Trustee Board
- Images from CCTV cameras are only used for security purposes
- Analyse the diversity of our boards and local governing bodies to ensure they are reflective of the communities we serve

## **Legal Basis**

We process this information under Article 6(1)(a) of the General Data Protection Regulations (GDPR) where you have given your explicit consent and under Article 6(1)(e) of the GDPR, where processing is necessary for us to perform a task in the public interest or for our official functions. Under section 538 of the Education Act 1996, we are required to provide certain information we hold about our governors and governance arrangements to the Secretary of State for Education through EduBase.

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify our use of your data.

## **Special Category Conditions**

We do not store or process any special category data as covered by Article 9.

## **Collecting this 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 data protection legislation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

## **Storing this information**

Personal data is stored in line with our Data Protection, Information Management and Retention Policy.

Information about individual governors will be destroyed as far as possible at the end of their term of office, subject to the requirements to provide information on our website about governors who have served in the last 12 months and to retain minutes of governing body meetings for 6 years.

## **Who we share this information with**

We routinely share this information with:

- our local authority
- the Department for Education (DfE)
- Accountants
- Auditors
- Companies House
- Legal support eg. Browne Jacobson

## **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.

## **Why we share governors' information**

The Constitution of Governing Bodies of Maintained Schools Statutory Guidance (2017) requires us to publish on our website information about our Governors, including relevant business and pecuniary

interests. Apart from this published information, we do not share information about Governors with anyone without consent unless the law and our policies allow us to do so.

### **Requesting access to your personal data**

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
- 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.

If you would like to make a request, please contact our Data Protection Officer or The Director of Academy Operations (contact details below). You are entitled to submit subject access requests all year round, but please bear in mind that it may be necessary for us to extend the response period when requests are submitted over the summer holidays. This is in accordance with article 12(3) of the GDPR, and will be the case where the request is complex – for example, where we need multiple staff to collect the data.

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; and
- 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.

### **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 data protection officer or Director of Academy Operations. 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

## **Further information**

If you would like to discuss anything in this privacy notice, please contact:

**Data Protection Officer**

**Mrs Gill Smith**

[gill@mindography.co.uk](mailto:gill@mindography.co.uk)

**Director of Academy Operations**

**Miss Rebecca Leonard**

[Leonardr@boltonimpacttrust.org.uk](mailto:Leonardr@boltonimpacttrust.org.uk)