St Charles and St Mary's Catholic Primary Schools Federation

Privacy Notice – Governors and Volunteers

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, St Charles Catholic Primary School and Saint Mary's Primary School, are the Data Controllers for the purposes of data protection law.

As a public body, we have appointed Grow Partners Ltd as its Data Protection Officer (DPO). The responsible contact is David Coy, david.coy@london.anglican.org, Tel: 020 3837 5145.

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What data we process

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, next of kin, dependents, marital status)
- contact details (such as telephone numbers, email addresses, postal addresses, 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 meeting attendance, visits, roles, and leadership responsibilities)
- information about business and pecuniary interests
- information from pre-employment background checks (such as criminal record, online search)
- closed-circuit television (CCTV) footage
- data about your use of the school's information and communications system
- photographs & video (for internal safeguarding & security purposes, school newsletters, media, and promotional purposes)
- payment and banking details where required (e.g., for expense claims).

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 Governors & Volunteers can be requested by contacting:

- Fred Fowle (Frederick.fowle@st-charles.rbkc.sch.uk) at St Charles
- Claire Browne (claire.browne@st-marys.rbkc.sch.uk) at Saint Mary's.

Why we process this

The reasons we collect and process this data 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.

Our lawful basis for processing this data

This section contains information about the legal basis that we are relying on when handling your information. These are defined under data protection legislation and for personally identifiable information are:

- Processing is necessary to fulfil a contract with you
- You have given consent for one or more specific purposes
- Processing is necessary to comply with the school's legal obligations
- Processing is necessary to protect your vital interests
- 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 the school's 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:

- You have given explicit consent
- Employment, social security, and social protection
- It is necessary to fulfil the school's obligations or your obligations
- It is necessary to protect your vital interests
- 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.

Collecting this data

While the majority of information you provide to us 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.

How we store this data

Personal data is stored in accordance with the schools' Data Retention policy.
We retain personal information about all volunteers. This information 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 obtained by contacting:

- Fred Fowle (Frederick.fowle@st-charles.rbkc.sch.uk) at St Charles, telephone: 02089695566

- Claire Browne (claire.browne@st-marys.rbkc.sch.uk) at Saint Mary's, telephone: 02089690321.

Who we share data 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
- Roman Catholic Diocese of Westminster – to meet our obligations
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as governor support and IT services
- Training centres and awarding bodies-in order to share 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 requests
- Police forces, courts, tribunals, security organisations- to create a secure workplace for all at the school.
- Charities and voluntary organisations.

Transferring data internationally

We may send your information to other countries when:

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

We conduct due diligence on the companies we share data with and note whether they process data in the UK, EEA (which means the European Union, Liechtenstein, Norway and Iceland) or outside of the EEA.

The UK and countries in the EEA are obliged to adhere to the requirements of the GDPR and have equivalent legislation which confer the same level of protection to your personal data.

For organisations who process data outside the UK and EEA we will assess the circumstances of how this occurs and ensure there is no undue risk.

Additionally, we will assess if there are adequate legal provisions in place to transfer data outside of the UK.

Why we share this data

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

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.

<u>Your Other Rights regarding your Data</u>
You may:

- Withdraw your consent to processing at any time (this only relates to data for which the school relies on consent as a lawful basis for processing)
- Ask us to rectify, erase or restrict processing of your personal data, or object to the processing of it in certain circumstances and where sufficient supporting evidence is supplied
- Prevent the use of your 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 your personal data is transferred outside of the United Kingdom.
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect you)
- Request a cease to any processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Refer a complaint to the ICO
- Ask for your personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances).

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

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

- Fred Fowle (Frederick.fowle@st-charles.rbkc.sch.uk) at St Charles, telephone: 02089695566

- Claire Browne (claire.browne@st-marys.rbkc.sch.uk) at Saint Mary's, telephone: 02089690321.

We reserve the right to verify the requesters' identity by asking for Photo ID. If this proves insufficient, then further ID may be required.

Article 22 of the UK GDPR has additional rules to protect individuals from decisions made solely for the purpose of

automated decision-making and profiling. The school does not carry out any automated decision-making and/or profiling on Governors or volunteers

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 either of the following and advise us without delay:

- Fred Fowle (Frederick.fowle@st-charles.rbkc.sch.uk) at St Charles, telephone: 02089695566
- Claire Browne (claire.browne@st-marys.rbkc.sch.uk) at Saint Mary's, telephone: 02089690321.

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 the school in the first instance via

- Fred Fowle (Frederick.fowle@st-charles.rbkc.sch.uk) at St Charles, telephone: 02089695566
- Claire Browne (claire.browne@st-marys.rbkc.sch.uk) at Saint Mary's, telephone: 2089690321 This complaint may be assessed by our independent Data Protection Officer, David Coy (contactable on david.coy@london.anglican.org, 020 3837 5145), with a final response provided within 30 days.

If you are unhappy with the school's final response you can refer the matter 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

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our independent DPO; David Coy (contactable on david.coy@london.anglican.org, 020 3837 514. Alternatively you can contact:

- Fred Fowle (Frederick.fowle@st-charles.rbkc.sch.uk) at St Charles, telephone: 02089695566
- Claire Browne (claire.browne@st-marys.rbkc.sch.uk) at Saint Mary's, telephone: 02089690321.

Changes to this Privacy Notice.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.