



# Privacy notice - governors

**Review cycle:** Every 3 years

**Approval level:** Headteacher

**Tier:** 3

**Staff responsible for review:** Assistant Headteacher

**Approved:** 1/2/23

**Date of next review:** 1/2/26

## 1. Introduction

Under UK data protection law, individuals have a right to be informed about how our 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 our school in a voluntary capacity, including governors**.

We, Todmorden High School, Ewood Lane, Todmorden, OL14 7DG, 01706813558, are the 'data controller' for the purposes of UK data protection law.

Our data protection officer is Craig Stilwell (see 'Contact us' below).

## 2. The personal data we hold

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

- Contact details
- Evidence of qualifications
- Employment details
- Information about business and pecuniary interests

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to:

- Information about any health conditions you have that we need to be aware of
- Information about disability and access requirements
- Photographs and CCTV images captured in school

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

## 3. Why we use this data

We use the data listed above to:

- a) Establish and maintain effective governance
- b) Meet statutory obligations for publishing and sharing governors'
- c) Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- d) Undertake equalities monitoring
- e) Ensure that appropriate access arrangements can be provided for volunteers who require them

### **3.1 Use of your personal data for marketing purposes**

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

### **3.2 Use of your personal data in automated decision making and profiling**

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

## **4. Our lawful basis for using this data**

Depending on the purpose, our use of your information will be legal due to one of the following:

- Informed consent given by you [Article 6(1)(a)].
  - For example: The use of banking information in our payment service.
- To meet the terms of a contract.
  - For example: Recording the amount of annual leave you have taken.
- To meet a legal requirement [Article 6(1)(c)].
  - For example: Providing information to HMRC.
- To protect the vital interests of you or someone else [Article 6(1)(d)].
  - For example: Giving your contact details to emergency services.
- Delivering a public task [Article 6(1)(b)].
  - For example: Keeping records of meeting with parents.

Where we use special category personal data we process this under the following exemptions from Section 9 of GDPR:

- Explicit consent given by you [Article 9(2)(a)].
- For example: The use of biometric information to identify you for our catering system.
- Information used in the field of employment [Article 9(2)(b)].
- For example: Using information about ethnic origin for equality monitoring purposes.
- To protect the vital interests of you or someone else [Article 9(2)(c)].
- For example: providing details of any medical conditions you have in the event of an emergency.
- For substantial public interest [Article 9(2)(g)].
- For example: Using information about your health to ensure a safe working environment.

## **5. Collecting this data**

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

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.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals

## **6. How we store this data**

We keep personal information about you while you volunteer at our school. We may also keep it beyond your work at our school if this is necessary. Our data retention policy and retention schedule sets out how long we keep information about governors and other volunteers.

If you would like a copy of our Data retention policy and schedule

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

## **7. Who we share data with**

We do not share information about you with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with UK data protection law), we may share personal information about you with:

- Our local authority Calderdale – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Government departments or agencies
- Our regulator, Ofsted
- Our auditors
- Health authorities
- Security organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

## **7. Your rights**

### **7.1 How to access personal information that we hold about you**

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- 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 us (see 'Contact us' below).

## **7.2 Your other rights regarding your data**

Under UK data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge 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
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

## **8. 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.

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

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## **10. Contact us**

School is required to have someone called a Data Protection Officer or DPO. The DPO advises the school about issues to do with data protection, but can also help you, if you have a problem.

**Our Data Protection Officer is:** Craig Stilwell

Data Protection Officer Details: Judicium Consulting Ltd, 72 Cannon Street, London, EC4N 6AE

Data Protection Officer Email: [dataservices@judicium.com](mailto:dataservices@judicium.com).

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/> or call 0303 123 1113.

### **GDPR Ambassador**

In school we have a GDPR Ambassador who you can contact should you require. Our GDPR Ambassador is:

Alison Mansfield

Todmorden High School, Ewood Lane, Todmorden, OL14 7DG

[a.mansfield@todhigh.co.uk](mailto:a.mansfield@todhigh.co.uk)