



Governor/Volunteer privacy notice (GDPR compliant)

The School is aware of its obligations under the General Data Protection Regulation (GDPR) and is committed to processing your data securely and transparently. This privacy notice sets out, in line with GDPR, the types of data that we hold on you as an employee of the School. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

This notice applies to current and former School Governors and other volunteers.

Data controller details

The School is a data controller, meaning that it determines the processes to be used when using your personal data. Our contact details are as follows:

Droitwich Spa High School and Sixth Form Centre, Briar Mill, Droitwich, WR9 0AA

Data protection principles

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for reasons that we find proper for the course of your association with this school and in ways that have been explained to you
- only use it in the way that we have told you about
- ensure it is correct and up to date
- keep your data for only as long as we need it
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed

Types of data we process

We may hold many types of data about you, including:

- your personal details including your name, address, date of birth, email address, phone numbers
- your photograph
- gender
- medical or health information including whether or not you have a disability
- information used for equal opportunities monitoring about your sexual orientation, religion or belief and ethnic origin
- information included on your Governor/Volunteer application including references
- driving licence
- National Insurance number
- details of your criminal record
- training details
- CCTV footage
- DBS information



How we collect your data

We collect data about you in a variety of ways and this will usually start when we undertake a recruitment exercise where we will collect the data from you directly. This includes the information you would normally include in your Governor/Volunteer application form and/or cover letter, or notes made by our recruiting officers during a recruitment interview. Further information may be collected directly from you when you at the start of your association with the school, for example, your next of kin details. Other details may be collected directly from you in the form of official documentation for example your driving licence should you be required to drive school vehicles.

In some cases, we will collect data about you from third parties, such as employment agencies, former employers when gathering references.

Personal data is kept in a secure file within the School's HR and IT systems.

Why we process your data

The law on data protection allows us to process your data for certain reasons only:

- in order to perform the agreement that we are party to
- in order to carry out legally required duties
- where something is done in the public interest.
- in order for us to carry out our legitimate interests
- to protect your interests

All of the processing carried out by us falls into one of the permitted reasons. Generally, we will rely on the first three reasons set out above to process your data. For example, we need to collect your personal data in order to:

- carry out the agreement that we have entered into with you

We also need to collect your data to ensure we are complying with legal requirements such as:

- safeguarding
- Making reasonable adjustments for disabled Governors and other volunteers.

We also collect data so that we can carry out activities which are required of us as School. We have set examples of these below:

- assessing training needs
- business planning
- dealing with legal claims made against us
- preventing fraud
- ensuring our administrative and IT systems are secure and robust against unauthorised access
- to meet our safeguarding duties



Special categories of data

Special categories of data that may be held relating to you include data about your:

- health
- race
- ethnic origin
- genetic and biometric data.

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already made the data public.

We will use your special category data:

- for the purposes of equal opportunities monitoring
- to determine reasonable adjustments

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations or exercise specific rights under employment law. However, we may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

Criminal conviction data

We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. This data will usually be collected at the recruitment stage, however, may also be collected during your association with the school. We use criminal conviction data in the following ways:

- We process this data because of our legal obligation in regard to safeguarding

If you do not provide your data to us

One of the reasons for processing your data is to allow us to carry out our duties in line with our Volunteer agreement with you. If you do not provide us with the data needed to do this, we may be prevented from confirming, or continuing with your association with the school as it may prevent us from meeting our legal obligations eg where appropriate, confirming your legal status for carrying out your work via a criminal records check.

Sharing your data

Your data will be shared with colleagues within the School where it is necessary for them to undertake their duties. This includes, for example, the Headteacher or Head of Department, The Governance Manager, the HR department for maintaining personnel records under your volunteer agreement.

We share your data with third parties in order to *obtain references as part of the recruitment process*. We may also share your data with third parties for other reasons to comply with a legal obligation upon us.

We do not share your data with bodies outside of the European Economic Area.

Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such. Please refer to our Data Protection, Data Breach and Retention Policies for more details, these can be found on our Website at www.droitwichspahigh.worcs.sch.uk

Where we share your data with third parties, we provide written instructions to them to ensure that your data are held securely and in line with GDPR requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

How long we keep your data for

In line with data protection principles, we only keep your data for as long as we need it for, which will be at least for the duration of your employment with us though in some cases we will keep your data for a period after your employment has ended. Retention periods can vary depending on why we need your data and are set out in our data retention policy and retention schedule which is available on the school web site and school portal.

Automated decision making

No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

Your rights in relation to your data

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- the right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice
- the right of access. You have the right to access the data that we hold on you. To do so, you should make a subject access request. You can read more about this in our Subject Access Request policy which is available from *[insert details]*
- the right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it



- the right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it
- the right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct
- the right to portability. You may transfer the data that we hold on you for your own purposes
- the right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests
- the right to regulate any automated decision-making and profiling of personal data. You have a right not to be subject to automated decision making in way that adversely affects your legal rights.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact *The HR and Administration Manager* who is the School's appointed chief privacy officer in respect of its data protection activities and can be contacted at Droitwich Spa High School and Sixth Form Centre, Briar Mill, Droitwich, WR9 0AA or by email at privacy@droitwichspahigh.worcs.sch.uk

Making a complaint

The supervisory authority in the UK for data protection matters is the Information Commissioner (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO.

Data Protection Officer

The School's Data Protection Officer is the *Governance Manager* who can be contacted at Droitwich Spa High School and Sixth Form Centre, Briar Mill, Droitwich, WR9 0AA or by email at privacy@droitwichspahigh.worcs.sch.uk.