



## **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
- Governor role, start and end dates, governor ID



## 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 Head of Governance, 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 are required to lawfully share information about individuals in governance roles with the Department for Education (DfE) under the requirements set out in the [academy trust handbook](#). Data is entered manually on the GIAS service and held by the DfE under a combination of software and hardware controls which meet the current [government security policy framework](#).

- increase the transparency of governance arrangements
- enable local authority maintained schools, academies, academy trusts and the Department for Education (DfE) to identify more quickly and accurately individuals who are involved in governance and who govern in more than one context
- allow the Department for Education (DfE) to be able to uniquely identify an individual and in a small number of cases conduct checks to confirm their suitability for this important and influential role

To find out more about the requirements placed on us by the Department for Education (DfE) including the data that we share with them, go to <https://www.gov.uk/government/news/national-database-of-governors>

Some of these personal data items are not publicly available and are encrypted within the GIAS system. Access is restricted to authorised Department for Education (DfE) and education establishment users with a Department for Education (DfE) Sign-in (DSI) account who need to see it in order to fulfil their official duties. The information is for internal purposes only and not shared beyond the Department for Education (DfE) unless the law allows it.

For more information, please see the '[How Government uses your data](#)' section.

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 <https://website.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.

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

The UK GDPR gives you certain rights about how your information is collected and used. To make a request for your personal information, contact [**include details of administrator / data protection officer**]

Your rights include:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request.  
<https://website.droitwichspahigh.worcs.sch.uk/index.php/communications/information-management-and-data-protection/>
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'.
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances.
- the right to portability. You may transfer the data that we hold on you for your own purposes
- rights in relation to automated decision making and profiling.



- the right to withdraw consent at any time (where relevant). 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.
- the right to [complain to the Information Commissioner](#) if you feel we have not used your information in the right way.

There are legitimate reasons why your information rights request may be refused. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the [How Government uses your data](#) section of this notice.

### **Withdrawal of consent and the right to lodge a complaint**

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting *the Head of HR and Administration* who is the School's appointed chief privacy officer in respect of its data protection activities at Droitwich Spa High School and Sixth Form Centre, Briar Mill, Droitwich, WR9 0AA or by email at [privacy@droitwichspahigh.worcs.sch.uk](mailto:privacy@droitwichspahigh.worcs.sch.uk).

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.

### **How to find out what personal information the Department for Education (DfE) hold about you**

Under the terms of the [Data Protection Act 2018](#), you're entitled to ask the Department for Education (DfE):

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to



- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department for Education (DfE), you should make a subject access request (SAR). Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

or

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

To contact DfE: <https://www.gov.uk/contact-dfe>

### **Data Protection Officer**

The School's Data Protection Officer 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](mailto:privacy@droitwichspahigh.worcs.sch.uk).