

Privacy notice for Members, Directors, Governors and other volunteers

1 Introduction

Under UK data protection law, individuals have a right to be informed about how the Frays Academy Trust 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 schools or for the Trust in a voluntary capacity, including Governors, Trustees (known as Directors), Members and parent helpers.**

We, the Frays Academy Trust, are the 'data controller' for the purposes of UK data protection law. Our contact details are: Frays Academy Trust, c/o Cowley St Laurence CE Primary School, Worcester Road, Cowley, Uxbridge, UB8 3TH, 01895 59 00 59, office@fraysacademytrust.org.

Our schools are:

- All Saints CE Primary School
- Beechwood Primary School
- Cowley St Laurence CE Primary School
- Keep Hatch Primary School
- Laurel Lane Primary School
- St Matthew's CE Primary School
- St Martin's CE Primary School

Our data protection officer is SchoolPro (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 including your name, address, telephone numbers, email addresses
- References
- Evidence of qualifications
- Employment details
- Information about your 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
- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- 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 The governance data we hold

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

- Role
- Start date
- End date
- Governor ID
- Appointment details

4 Why we use this data

We use the data listed above to:

- Establish and maintain effective governance
- Meet statutory obligations for publishing and sharing governors', trustees' and members' details
- Facilitate safe recruitment, as part of our safeguarding obligations towards our students
- Undertake equalities monitoring
- Ensure that appropriate access arrangements can be provided for volunteers who require them

5 Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Carry out a task in the public interest
- Comply with a legal obligation

We are required to collect and share information about individuals in governance roles with the Department for Education (DfE) under the requirements set out in the [Academy Trust Handbook](#).

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)
- There is a legitimate interest to share the information

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 would go about withdrawing consent if you wish to do so.

For 'special category' data and criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and one or more of the conditions for processing as set out in UK data protection law.

6 Collecting this data

While the majority of information we collect about you is mandatory, there is some information that you can choose whether or not to provide 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.

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

7 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 with us if this is necessary. Our records retention schedule sets out how long we keep information about governors/trustees/members and other volunteers and is available on request (see 'contact us').

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, in keeping with our Records Management Policy, which is available on the Trust website or from the DPO (see 'contact us' below).

8 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:

- Government departments or agencies – to meet our legal obligations to share information about Members, Directors and Governors
- Local authorities (our schools are based in the London Borough of Hillingdon and Wokingham Borough Council) – to meet our legal and statutory obligations to share certain information with them
- Suppliers, contractors and service providers – to enable them to provide any services we have contracted them for, such as governance support
- Police forces, courts – in order to uphold law and order

We are required to share information about individuals in governance roles with the Department for Education (DfE) under the requirements set out in the [Academy Trust Handbook](#).

All data is entered manually on the GIAS service and held by the Department for Education (DfE) under a combination of software and hardware controls which meet the current [government security policy framework](#).

8.1 Transferring data internationally

Where we transfer your personal data outside the UK, we will do so in accordance with UK data protection law.

9 Your rights

9.1 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).

9.2 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:

- Be informed about the collection and use of your personal data
- 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) and for profiling
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict 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).

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.

10 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

11 Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **Data Protection Officer**: SchoolPro, Midway House, Herrick Way, Staverton Technology Park, Staverton, Cheltenham, Gloucestershire, GL51 6TQ, email: dpo@schoolpro.uk or telephone: 0203 2909 093.

In addition, our Headteachers have day-to-day responsibility for data protection issues in our schools. If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, you can also contact them via the appropriate school office.

12 How government uses your data

The governance data that we lawfully share with the Department for Education (DfE) via GIAS will:

- 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.

13 Data collection requirements

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.

14 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). See the guide for details:

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

Further information on what personal information the Department for Education (DfE) holds about you is published in the privacy notice below:

<https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers>

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