



MANOR

MULTI ACADEMY TRUST

Governor Privacy Notice

Approved by Directors: March 2023

Due for Review: March 2024+

Governor Privacy Notice

For the purposes of this Privacy Notice, the term Governor shall be used to include Manor Multi Academy Trust Members and Directors and Local Governing Body Governors.

How we use Governor information

Manor Multi Academy Trust are committed to providing a secure and safeguarded environment for all Governors. Security of all data and personal information is of paramount importance and strongly believes that each and every employee and Governor has a duty of care to ensure all personal data is treated with upmost respect and care. It is strongly advised that all Governors read carefully the following Governor Privacy Notice as well as the associated Data Protection Policy, Safeguarding and e-Safety Policies that encompass our true reflection on our approach to all aspects of operating our secure environment.

It is also very important that our Governors understand that the use of any personal data will be lawfully processed and used for multiple governance related purposes, both during the term of your office with the Manor Multi Academy Trust and after in line with our statutory obligations. We encourage any Governor to question this if they feel this may not be the case and to bring to the immediate attention of Trust School Data Protection Officer.

The categories of Governor information that we process include:

- personal information (such as name, date of birth, home address and email address)
- personal and business interests
- characteristics information (such as gender, age, ethnic group)
- term of office and meeting attendance information
- professional qualifications and experience
- ID, photographs
- Relevant training record for Education establishments
- relevant medical and dietary information, including Doctors details
- DBS (Disclosure & Barring Service) and section 128 check information – this may include Passport, Utility Bills, Driving License information
- emergency contact details (Name and contact number) of spouse, partner or family members

This list is not exhaustive but covers the majority of personal details we may process and hold on record during your term of office and after in line with our statutory obligations. This information will be held on administration restricted area on Governor Hub as well as manual files stored securely in school and or school MIS cloud based system.

Why we collect and use Governor information

We use Governance data to:

- to meet the statutory duties placed upon us (e.g. Academies Financial Handbook, Governance Handbook)
- enable review and development of our governance structure, recruitment and retention
- to communicate efficiently and effectively with regard to the role

Under the UK General Data Protection Regulation (UK GDPR), the legal basis we rely on for processing personal information for general purposes are (Article 6):

1. Processing shall be lawful only if and to the extent that at least one of the following applies:
 - a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;

- b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
 - c) processing is necessary for compliance with a legal obligation to which the controller is subject;
 - d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
 - e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
 - f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.
- Point (f) of the first subparagraph shall not apply to processing carried out by public authorities in the performance of their tasks.

The purpose of the processing shall be determined in that legal basis or, as regards the processing referred to in point (e) of paragraph 1, shall be necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. That legal basis may contain specific provisions to adapt the application of rules of this Regulation, inter alia: the general conditions governing the lawfulness of processing by the controller; the types of data which are subject to the processing; the data subjects concerned; the entities to, and the purposes for which, the personal data may be disclosed; the purpose limitation; storage periods; and processing operations and processing procedures, including measures to ensure lawful and fair processing such as those for other specific processing situations.

Collecting Governor information

We may collect personal information via electronic or manual handwritten form method.

Governance data is essential for the school / Multi Academy Trust and Government/Department for Education's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with UK GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this.

Storing Governor information

We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe.

We hold data securely for all Governors. Governor information can be stored in two secure ways.

1. Manual records will be kept in a secure room within secure locked filing cabinets. Physical access to the storage is limited by key access on both parts.
2. Electronically the information is securely stored on local server infrastructure on an encrypted physical drive which is also permissioned and account password protected accordingly to staff that only require access to this information. Administrative ICT access is allowed for maintenance reasons including backup and retention. It is also required to remove the information as and when the retention schedule on the data ends. Onsite and Offsite backup location remain with the Multi Academy Trust and not shared with any 3rd Party. Information may be secured within Manor Multi Academy Trust Microsoft Office 365 cloud environment and again this is account password protected and permissioned accordingly. School policy determines that all information synchronised / stored on devices are account / password or pin protected as well as being encrypted if Windows based. Mobile devices require a minimum of pin code or password protection which are not to be shared.

Governor information is also processed and stored on:

- a) GovernorHub – for communication purposes, minutes of meetings and other administrative notifications
- b) GIAS (Get Information About Schools) in line with our statutory obligations

- c) Our Trust and School websites in line with our statutory obligations

Who we share governor information with

We may share this information with:

- The Department for Education (DfE), central government and/or the relevant School's Local Authority
- Training providers
- School staff (where appropriate, usually administrative)
- Law enforcement organisation and courts
- Professional advisers (i.e Legal)
- Suppliers and service providers (Eg.HR & Payroll)
- Security organisations (including CCTV and signing in systems)
- Press and the media

The above list is not exhaustive but includes current working practises and the potential for information to be shared legally, appropriately and purposefully in the interest of all parties involved.

Why we share school Governor information

We do not share information about our Governors with anyone without their consent unless the law and our policies require/allow us to do so.

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the MAT Data Protection Officer.

You also have the right to:

- ask us for access to information about you that we hold
- have your personal data rectified if it is inaccurate or incomplete (it is also your duty to inform us of any personal information changes in a timely manner)
- request the deletion or removal of personal data where there is no compelling reason for its continued processing
- restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you
- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- a right to seek redress, either through the ICO, or through the courts

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 dpo@manormat.com

If you have a concern about the way we are collecting or using your personal data, we ask 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/>

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time.