Invicta Primary School
Privacy Notice for Governors

INVICTA PRIMARY SCHOOL: Privacy Notice for Governors

This is based on the Invicta Primary School Learning Charter and takes into account the varying learning styles of children and adults at Invicta in a dyslexia friendly environment.It also reflects the whole school approach in promoting emotional wellbeing and good mental health for the children, the staff and the wider community.

Our Vision
To provide a high quality learning and teaching environment where every child and adult has the opportunity to develop to their full potential.

At Invicta we aspire for all our children to:

- Reach their full potential
- Enjoy a happy, safe and healthy lifestyle
- Learn with confidence, enthusiasm and high expectations
- Consider others with respect and tolerance

We achieve this by providing:

- *Excellent teaching* – providing excellent learning for every child.
- *A caring school* - valuing the contribution of parents, children and the wider community.
- *A creative curriculum* - giving children practical opportunities to learn through the environment around them.
- *A rewarding atmosphere – taking every opportunity to celebrate the achievements and successes of our children*

"Looking beyond together"

Reviewed last	March 2023
Date next due for review:	Spring 2025

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Invicta Primary School is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your work relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR).

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

It applies to governors and volunteers.

Who Collects This Information

Invicta Primary School is a "data controller." This means that we are responsible for deciding how we hold and use personal information about you.

We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of any contract of employment or other contract to provide services and we may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data Protection Principles

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

The Categories of Information That We Collect, Process, Hold and Share

We may collect, store and use the following categories of personal information about you: -

- Personal information and contact details such as name, title, addresses, date of birth, marital status, phone numbers and personal email addresses;
- Emergency contact information such as names, relationship, phone numbers and email addresses;
- Education details;
- DBS details;
- Employment details;
- Information about business and pecuniary interests;
- Information acquired as part of your application to become a governor;
- Criminal records information as required by law to enable you to work with children;
- Information about your use of our IT, communications and other systems, and other monitoring information;

Images captured by the School's CCTV system;

How We Collect This Information

We may collect this information from you directly, from the DBS, other employees and professionals we may engage, automated monitoring of our websites and other technical systems such as our computer networks and connects, CCTV and access control systems, remote access systems, email and instant messaging systems, intranet and internet facilities.

A majority of the information that we collect from you is mandatory, however there is some information that you can choose whether or not to provide it to 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.

How We Use Your Information

We will only use your personal information when the law allows us to. Most commonly, we will use your information in the following circumstances: -

Where you have provided your consent;
Where we need to perform the contract we have entered into with you;
Where we need to comply with a legal obligation (such as health and safety legislation and under statutory codes of practice);
Where it is needed in the public interest or for official purposes;
Where it is necessary for our legitimate interests (or those of a third party) and your interests, rights and freedoms do not override those interests.

We need all the categories of information in the list above primarily to allow us to comply with our legal obligations and to enable us as a School to perform our public task. Please note that we may process your information without your knowledge or consent, where this is require or permitted by law.

The situations in which we will process your personal information are listed below: -

To determine appointment and suitability as a governor;
To deal with election of governors;
To comply with safeguarding obligations;
To provide details on our website or online databases about governors;
To communicate with third parties and other stakeholders to the School;
For business management and planning purposes (including accounting, budgetary and health and safety purposes;
For financial purposes (such as expenses);
To deal with any complaints/investigations as required;
When you sit on a panel or committee, name and comments as well as decisions made;
To send communications in your role as governor;

For education, training and development requirements;
In order to review governance of the School;
In order to comply with any legal dispute or any legal obligations;
In order to comply with regulatory requirements or health and safety obligations;
To ensure system security, including preventing unauthorised access to our networks;
To monitor use of our systems to ensure compliance with our IT processes;
To receive advice from external advisors and consultants;
To liaise with regulatory bodies (such as the DfE, DBS); and
Dealing with termination of your appointment;

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.
If you fail to provide certain information when requested, we may be prevented from complying with our legal obligations (such as to ensure health and safety). Where you have provided us with consent to use your data, you may withdraw this consent at any time.
We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

How We Use Particularly Sensitive Information

Sensitive personal information (as defined under the UK GDPR as "special category data") require higher levels of protection and further justification for collecting, storing and using this type of personal information. We may process this data in the following circumstances: -

In limited circumstances, with your explicit written consent;
Where we need to carry out our legal obligations in line with our data protection policy;
Where it is needed in the public interest, such as for equal opportunities monitoring (or in relation to our pension scheme);
Where it is needed in relation to legal claims or where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent.

Criminal Convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where it is necessary to carry out our legal obligations. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.
Where appropriate we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of working for us.

Automated Decision Making

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Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision making in the following circumstances: -

Where we have notified you of the decision and given you 21 days to request a reconsideration;
Where it is necessary to perform the contract with you and appropriate measures are put in place to safeguard your rights; or
In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Sharing Data

We may need to share your data with third parties, including third party service providers where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. These include the following: -

Government departments or agencies
The Local Authority
Suppliers and Service providers
Professional advisors and consultants
The Department for Education
Law enforcement
Support services;
DBS.

Information will be provided to those agencies securely or anonymised where possible.
The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.

Retention Periods

Except as otherwise permitted or required by applicable law or regulation, the School only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.
To determine the appropriate retention period for personal data, the School considers the amount, nature, and sensitivity of personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for processing the personal data, whether we can fulfil the purposes of processing by other means and any applicable legal requirements.
Once you are no longer a governor or volunteer of the school we will retain and securely destroy your personal information in accordance with our data retention policy.

Security

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We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. Details of these measures are available.
Third parties will only process your personal information on our instructions and where they have agreed to treat information confidentially and to keep it secure.
We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Your Rights of Access, Correction, Erasure and Restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.
Under certain circumstances by law you have the right to: -

Access your personal information (commonly known as a "subject access request"). This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively we may refuse to comply with the request in such circumstances.
Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.
Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
To object to processing in certain circumstances (for example for direct marketing purposes).
To transfer your personal information to another party.

If you want to exercise any of the above rights, please contact the School Business Manager in writing.
We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact School Business Manager. Once we have received notification that you have withdrawn

your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

How to Raise a Concern

We hope that the School Business Manager can resolve any query you raise about our use of your information in the first instance.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by the School Business Manager then you can contact the DPO on the details below: -

Data Protection Officer: Judicium Consulting Limited
Address: 72 Cannon Street, London, EC4N 6AE
Email: dataservices@judicium.com
Web: www.judiciumeducation.co.uk
Lead Contact: Craig Stilwell

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues.

Changes to This Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.