



The Leys and St Faith's Schools Foundation



PRIVACY NOTICE FOR GOVERNORS

INTRODUCTION

The Leys and St Faith's Schools ("the Schools") collect and process personal data relating to their Governors in order to successfully carry out their functions. The Schools are committed to being transparent about how they collect and use that data and to meeting their obligations under Data Protection Legislation (as defined below).

This Privacy Notice is to help you understand how and why we collect your personal data and what we do with that information. It also explains the decisions you can make about your own personal data.

This Notice should be read in conjunction with the Schools' Data Protection Policies, available on the Schools' respective websites.

DEFINITIONS

In this Policy, the following definitions apply:

"Data Protection Legislation" means (i) the General Data Protection Regulation (EU) 2016/679 ("GDPR") and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the United Kingdom and (ii) any successor legislation to the GDPR.

"Data controller", *"data subject"* and *"processing"* shall have the same meanings as in the Data Protection Legislation.

"Personal data" shall have the same meaning as in the Data Protection Legislation, namely information that we hold about you and which identifies you. This includes information such as your name, date of birth, nationality, address, next of kin, occupation, dietary and medical details, your photograph (including that processed by CCTV). Vehicle details for those authorised to use the Schools' car parks also count as personal data.

"Special categories of personal data" shall have the same meaning as in the Data Protection Legislation, namely personal data revealing racial or ethnic origin, political opinions, religious

or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a person's sex life or sexual orientation.

WHO WE ARE

Under Data Protection Legislation, the Schools are Data Controllers.

The contact details for the Schools are as follows:

The Leys School, Trumpington Road, Cambridge, CB2 7AD

St Faith's School, Trumpington Road, Cambridge, CB2 8AG.

If you have any comments, questions or concerns about the information in this notice or your rights, please contact the Compliance Officer at the Leys School address above or by email at complianceofficer@theleys.net. Alternatively, you can contact the Data Compliance Officer at the St Faith's School address above or by email at GDPR@stfaiths.co.uk.

HOW AND WHY DO WE COLLECT AND USE YOUR PERSONAL DATA?

The Schools use your personal data in order for you to act as a Governor of The Leys and St Faith's Schools Foundation and for compliance purposes.

Examples of how we collect your data are:

- Your CV and biography
- Governor Form
- Declaration of Interests Form
- Verbal or written information from you or others
- Taking your photograph on appointment in order to create your Governor lanyard.

OUR LEGAL GROUNDS FOR USING YOUR PERSONAL DATA

We rely on the following legal bases for processing your personal data:

- Where it is necessary for the Schools' **legitimate interests**, such as ensuring the effective running of the Schools, looking after the Schools' communities, advertising and improving the Schools.
- Where it is necessary for compliance with a **legal obligation**, such as disclosing your data to third parties such as the Government, Police and Local Authority where we are legally obliged to do so.
- Where it is necessary to protect your or someone else's **vital interests**, for example in an extreme emergency.

- Where it is necessary for the performance of a task carried out in the **public interest**, for example safeguarding and promoting the welfare of children, facilitating the effective operation of the Schools and for providing education services.

Special categories of your personal data need to be treated particularly sensitively and the Schools therefore have to further justify why they may need to use such data. Our lawful bases for processing these types of data, where applicable, are:

- Where you have given **explicit consent**;
- Where it is necessary to protect yours or someone else's **vital interests**;
- Where you have already made the data **manifestly public**;
- Where it is necessary for the purposes of establishing or defending a **legal claim**;
- Where there is a **substantial public interest**;
- Where it is necessary for the **provision of health or social care** or treatment.

CONSENT

On some occasions the Schools may ask for your consent to use your personal data. You may take back this consent at any time. However, any use the Schools have made of your information before you withdraw your consent will still be valid.

Please note that there are some circumstances where the Schools will not be able to accept your request for withdrawal of consent and we may rely on another justification for processing your personal data. We will inform you if this is the case when responding to your withdrawal of consent.

WHAT PERSONAL DATA DO THE SCHOOLS PROCESS?

Below are some examples of the ways in which we use your personal data and special categories of data:

- We use your details to contact you by email, post or telephone;
- We obtain the name of your spouse to use on Speech Day;
- We collect medical information in case of any emergencies whilst you are on the School sites;
- We collect dietary information as food is sometimes provided for Governors;
- We collect details of your nationality to check your right to work in the UK;
- We obtain details of any overseas work that you have done and follow this up if necessary;
- We collect employment information, as well as other information that may lead to a conflict of interest in your role as Governor, such as any appointments, whether you

have any children at the Schools, whether you have a contractual relationship with the Foundation, etc.

- We record your attendance at meetings;
- We monitor the timescale of your role as a Governor;
- We record your skills that you provided in the Governor Form in order for us to assess the skills set across the Governing Body;
- CCTV is in place in areas around the Schools for safety reasons. CCTV is not used in private areas such as toilets;
- If someone makes a complaint we may need to use your information to ensure that we deal with this properly;
- We may, on occasion, use photographs or videos of you for the Schools' websites, social media sites, local news, prospectus and other marketing or teaching materials. We may continue to use these photographs and videos after you leave the Governing Body;
- We may keep some of your personal details (e.g. name, address, email address) when you leave the Governing Body so that we can send you Old Leysian or Old Fidelian News. We may also pass your details to our alumni organisations.

WHO HAS ACCESS TO YOUR PERSONAL DATA?

The majority of your personal data collected will remain within the Schools and only be used by the people who need to know the information. However, there are some instances where the Schools will need to share your personal data with other parties, for example:

- We share your name and role on the Governing body publicly on the Schools' websites;
- The Government, Government Departments and other public bodies. For example, we are legally required to provide some information, such as to Companies House or the Charity Commission. We will also share your information with the Department of Education when performing the Disclosure and Barring Service check;
- The Schools' bank for money laundering due diligence purposes;
- If you have worked full time in another country in the last five years for more than three months, the Schools will ask that you contact the relevant place of work for a reference;
- Where needed, legal experts or other professionals/consultants/advisors to ensure we fulfil our obligations;
- Inspectors (in particular the Independent Schools Inspectorate);
- Third party companies, such as web applications, to assist with Governor processes such as training;
- Third party 'cloud computing' services are used at Schools to store some information.

We will only share your personal data with other people or organisations when we have a good reason to do so and where the Schools are assured that your data will be kept securely. In exceptional circumstances, we may need to share it more widely than we would normally and we will notify you if that is likely to be the case.

TRANSFERRING PERSONAL DATA OUTSIDE OF THE UK

We may send your personal data to countries which do not have the same level of protection for personal data as there is in the EU. For example, we may communicate with you by email when you are overseas.

The European Commission has produced a list of countries which have adequate data protection. The list is available here https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en#dataprotectionincountriesoutsidetheeu.

If the country that we send your personal data to is not on the list, or is not a country within the European Economic Area (which means countries in the EU, Liechtenstein, Norway and Iceland), then it might not have the same level of protection for personal data as there is in the UK.

YOUR RIGHTS

Individuals have a number of rights under Data Protection Legislation which you can exercise in certain circumstances. These include:

- You have the right to be informed about our collection and use of your personal data;
- If the personal data we have on you is incorrect, you can ask us to correct it;
- You can ask us to delete the personal data we hold on you, for example when we no longer need the information;
- You can ask what personal data we hold about you and be provided with a copy. We will also give you extra information, such as why we use the information, where it came from and what types of people/organisations it has been sent to;
- You can object to the School processing your personal data;
- You can ask the School to restrict the use of your personal data where it is inaccurate, unlawful, no longer needed or where you have exercised your right to object;
- You can ask the School to send you or another organisation certain types of personal data about you in a commonly-used machine-readable format.

HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

The Schools will keep your personal data for as long as you are on the Governing Body. In some circumstances, such as for safeguarding and company compliance purposes, we will keep the information indefinitely.

For more information on retention of your personal data please contact the Compliance Officer at The Leys or the Operations Manager at St Faiths using the contact details above.

POLICY REVIEW

This Privacy Notice will be reviewed annually and where appropriate, amended at any time in accordance with any changes in the law or guidance provided by the Information Commissioner's Office. Where appropriate, the Schools will notify data subjects of those changes by writing or by email.

CONTACT

If you feel that the Schools have not acted properly when using your personal information, you can contact them using the details above.

If you are still unhappy with the way the Schools have handled your data, you can contact the Information Commissioner's Office on 0303 123 1113. For more information please see <https://ico.org.uk/concerns/>.