



Privacy Notice for Governors

Contents

Introduction	1
Data Protection Principles	1
Definitions	2
Responsibility for Data Protection	2
Types of Personal Data Collected and Processed by the Schools	3
How the Schools Collect and Store your Personal Data	3
How the Schools use your Personal Information	4
The Schools' Legal Grounds for Using your Personal Data	5
Criminal Convictions	6
Who has Access to your Personal Data and Who the Schools Share it With	6
Transferring Personal Data Outside the UK	7
Data Accuracy and Security	7
Automated Decision Making	7
Your Rights	7
How Long Do the Schools Keep your Personal Data for?	8
Privacy Notice Review	8
Queries and Complaints	8

Introduction

The Leys and St Faith's Schools (together forming part of The Leys and St Faith's Schools Foundation and referred to in this Privacy Notice as the "Schools") collect and process personal data relating to the Schools 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).

All Governors are encouraged to read this Privacy Notice. This Privacy Notice is to help Governors understand how and why the Schools collect their personal data and what the Schools do with that information. It also explains the decisions Governors can make about their own personal data.

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

Data Protection Principles

The Schools will comply with the data protection principles when gathering and using personal information, as set out in the Data Protection Policy, available on our website.



Definitions

In this Privacy Notice, the following definitions apply:

"Data Protection Legislation" means (i) the UK General Data Protection Regulation ("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) and vehicle details for those authorised to use the Schools' car parks.

"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.

Responsibility for Data Protection

The Schools have each appointed a Data Compliance Officer to deal with any requests and enquiries concerning the School's use of your personal data and to endeavour to ensure that all personal data is processed in compliance with this policy and current data protection legislation.

Under Data Protection Legislation, the Schools are Data Controllers and are jointly registered with the ICO under ICO Registration Number: Z570129X.

Details of the Data Compliance Officer for each School, and their contact details, are as follows:

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

Data Compliance Officer: Fiona Oliver

Email: compliance@theleys.net

Telephone: 01223 791441

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

Data Compliance Officer: Simon Holmes

Email: gdpr@stfaiths.co.uk

Telephone: [01223 352073](tel:01223352073)

The Schools have appointed Judicium Consulting Limited as their Data Protection Officer (DPO), and their contact details, are as follows:

Data Protection Officer: Judicium Consulting Limited

Address: 5th Floor, 98 Theobalds Road, London, WC1X 8WB



Email: dataservices@judicium.com

Web: www.judiciumeducation.co.uk

Telephone: 0345 548 7000 (Option 1, then 1)

If you have any comments, questions or concerns about the information in this Privacy Notice or your rights, please use the contact details listed above.

Types of Personal Data Collected and Processed by the Schools

The Schools may collect, store and process the following personal data, and special category data and some of the ways in which we use this data:

- Full name and date of birth;
- Your address and contact details to contact you by email, post or telephone;
- The name of your spouse to use for invitations to the Schools' events and emergency contact; information such as names, relationship to you, phone numbers and email addresses;
- Medical information in case of any emergencies whilst you are on the School sites;
- Dietary information as food is sometimes provided for Governors;
- Your nationality to check your right to work in the UK;
- Details of any overseas work that you have done to follow this up if necessary;
- Employment information, education information, and information that may lead to a conflict of interest in your role as Governor, such as any appointments or certain appointments of your immediate family, whether you have any children at the Schools, whether you have a contractual relationship with the Schools, and other pecuniary interests;
- Audio and video recordings of meetings on a video conferencing platform;
- Records of your DBS check;
- Your attendance at meetings and other visits to the Schools;
- The timescale of your role as a Governor;
- Details of your skills as you provided in the Governor Registration Form;
- CCTV which is in place in public areas around the Schools for safety reasons; and
- On occasion, photographs or videos of you will be used on 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 retire from the Governing Body.

How the Schools Collect and Store your Personal Data

Generally, the Schools receive your personal data from you directly. Examples of how we collect your data are:

- Documents collected on induction, such as your CV, biography, photograph, new Governor form and Conflict of Interests Form
- Verbal or written information from you or others, including in the ordinary course of interactions and communication.

However, in some cases personal data will be supplied by third parties or collected from publicly available resources.



Whilst the majority of information you provide to the Schools is mandatory, some of it is provided on a voluntary basis. To comply with the UK GDPR, the Schools will inform you whether you are required to provide certain information or if you have a choice in this.

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.

How the Schools use your Personal Information

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, and only where the School is lawfully allowed to do so. The situations in which we will process your personal data are listed below:

- Running recruitment and promotion processes and determining suitability;
- To maintain accurate and up-to-date Governor records and contact details (including details of who to contact in the event of an emergency);
- To provide details on our website 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;
- Ensuring compliance with education, training and development requirement;
- Complying with regulatory requirements or health and safety obligations;
- Ensuring system security, including preventing unauthorised access to our networks;
- Monitoring use of our systems to ensure compliance with our IT processes;
- Receiving advice from external advisors and consultants;
- Liaising with regulatory bodies (such as the DfE, DBS);
- Operating and keep a record of Governor performance, skills and related processes, to plan for career development, and for succession planning and workforce management purposes;
- Ensuring effective general HR and business administration;
- To comply with safeguarding obligations;
- Providing educational and other services;
- Keeping the school buildings and assets safe;
- Protecting the School's reputation;
- Providing references on request for current or former Governors;
- Responding to and defend against legal claims and ensure that all relevant legal obligations of the School are complied with;
- Monitoring (as appropriate) use of the School's IT and communications systems in accordance with the School's Acceptable Use of IT Policy for Staff (legal basis: legitimate interests, legal obligation);
- For security and safety purposes, including CCTV in accordance with the School's CCTV and Access Control Policy (legal basis: legitimate interests);



- Dealing with termination of your appointment; and
- 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.

The Schools' Legal Grounds for Using your Personal Data

The Schools will only use your information when the law allows it to. We rely on the following legal bases for processing your personal data:

- Where you have given clear **consent** to process your personal data for a specific purpose.
- 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 a **recognised legitimate interest** under the UK GDPR (as amended by the Data (Use and Access) Act 2025).
- 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.

Where the Schools ask for your consent for a specific use of 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 the Schools may process information about you without your consent or knowledge where this is required or permitted by law.

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 the processing is carried out in the course of our **legitimate activities** where there are **appropriate safeguards** in place;
- 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.



Criminal Convictions

The Schools 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.

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, or, the police during the course of working with us.

Who has Access to your Personal Data and Who the Schools Share it With

The majority of your personal data collected will remain with the Schools and only be available to staff on a “need to know” basis. However, there are some instances where the Schools will need to share your personal data with other parties, for example:

- With your consent, we will share your contact details with the rest of the Governing Body;
- 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 and for the purposes of the Schools’ censuses (both the Department for Education and the Independent School’s Council (ISC));
- We may share your information with the local authority or other Government departments or agencies, where required;
- 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, a relevant reference will be sought from your place(s) of work;
- Where needed, legal experts or other professionals/consultants/advisors to ensure we fulfil our obligations;
- Inspectorates (in particular the Independent Schools Inspectorate (ISI)) and auditors;
- Third party companies, such as web applications, to assist with Governor processes such as training and information dissemination to Governors;
- Third party ‘cloud computing’ services are used at the Schools to store some information; and
- If you voluntarily sign up to ‘Leys Link’, the School’s online career networking and mentoring platform, your data will be accessible by ‘Headhunter Systems Limited’, a company which the School has a data processing agreement in place with to ensure your data is processed securely. Some of your data will also be available to other users of the system, who are members of the Schools’ community. The School Administrator approves each individual who registers. Users of the system may include alumni, governors, parents and former parents, staff and former staff and Sixth Form pupils. You will have control over the data you upload to the system. Registered users are able to hide their contact details through the privacy settings on their account. Other information that users provide, either during registration or subsequently in their profile, will be visible to other approved registered users and this will at a minimum be (where applicable) first name, last name, affiliation to The Leys, school dates, house(s), company, job title, industry, location (city).



We will only share your personal data with other people or organisations when we have a lawful reason to do so and where the Schools are assured that your data will be processed securely. Information will be provided to agencies securely, and in an anonymised format wherever possible.

Transferring Personal Data Outside 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 UK. For example, we may communicate with you by email when you are overseas. Where the country does not have the same level of protection for personal data as there is in the UK, we will endeavour to put reasonable safeguards in place.

Data Accuracy and Security

The Schools take the security of your personal data seriously. It has internal policies and controls in place to ensure that your personal data is not lost, accidentally destroyed, misused or disclosed, and is accessed only by those who need to know the information for the performance of their duties.

The Schools will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate. You must notify the Schools of any changes to personal information the Schools hold about you by contacting the Clerk to the Governors.

Automated Decision Making

Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention. The Schools are allowed to use automated decision making in limited circumstances. You will not be subject to automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Your Rights

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

- **Rectification** - If the data we hold about you is incorrect, you can ask us to correct it. You also have the right to ask us to complete information you think is incomplete.
- **Erasure** - You can ask us to delete the personal data we hold on you in certain circumstances.
- **Access** - 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 data, where it came from and what types of people/organisations it has been sent to.
- **Object to processing** - You can object to the Schools processing your personal data in certain circumstances.
- **Restrict processing** - You can ask the Schools to restrict the use of your personal data in certain circumstances.
- **Data portability** - You can ask the Schools to send you or another organisation certain types of personal data about you in a commonly-used machine-readable format, in certain circumstances.
- **Be informed** – You have the right to be informed about our collection and use of your personal data.



If you want to exercise any of the above rights, please contact the person responsible for data protection at the relevant School, in writing.

How Long Do the Schools Keep your Personal Data for?

The Schools will retain Personal Data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason and will process your personal data for at least the duration of your Governor role. In some circumstances, such as for safeguarding and archiving, we will keep the data indefinitely.

We may also keep some of your personal data indefinitely for historical research and archiving purposes. This will usually be basic information such as your name and the dates that you were a Governor of the Foundation. For more information on retention of your personal data please use the contact details above.

Privacy Notice 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 (the "ICO"). Where appropriate, the Schools will notify data subjects of those changes in writing (including electronically).

Queries and Complaints

If you have any comments or queries on this Privacy Notice or the way we have handled your personal data, you may contact the person responsible for data protection at the relevant School or the School's externally appointed DPO using the details provided above.

If you believe that the School has not complied with data protection law because of the way we have handled your personal data or responded to a request where you have exercised your data subject rights, you can make a complaint to the School. You can use the form provided on our website or contact the School's Data Compliance Officer via email or telephone using the details provided above.

The School will endeavour to acknowledge your complaint within 5 working days of receipt and investigate and inform you of the outcome of your complaint within 30 days of receipt. More complex data protection complaints may take longer for us to resolve but we will keep you informed of progress and provide an expected timeframe.

If you are not satisfied with the outcome of your complaint or if you feel the School has not handled it properly, you may contact the Information Commissioner's Office (ICO) by contacting 0303 123 1113. Further information on making a complaint to the ICO is available here <https://ico.org.uk/make-a-complaint/>.