ST TERESA of CALCUTTA
Catholic Academy Trust

Governor/Volunteer Privacy Notice

What is the purpose of this document?

The ***Trust*** (St. Teresa of Calcutta Catholic Academy Trust – STOCCAT) is committed to protecting the privacy and security of your personal information. This Privacy Notice explains how and why we collect governors and volunteers' data, what we do with it and what rights you have.

The Trust is the Data Controller for all the schools within the Trust. The Trust's registered office is St Teresa of Calcutta Catholic Academy Trust, Imperial House, Hornby Street, Bury, BL9 5BN.

The Data Protection Officer for the Trust is Jenny Bonson, contactable via dpo@stoccat.org.uk

This Privacy Notice (Governor/Volunteer) explains how we collect, use, store, and share your personal information before, during, and after your working relationship with us, in accordance with the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Under data protection legislation, we are required to notify you of the information we hold in this privacy notice. This notice applies to those volunteering at our school, including Governors. 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 data protection law. This says that the personal information we hold about you must be:

(a) Used lawfully, fairly and in a transparent way;
(b) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
(c) Relevant to the purposes we have told you about and limited only to those purposes;
(d) Accurate and kept up to date;
(e) Kept only as long as necessary for the purposes we have told you about; and/or
(f) Kept securely.

The type of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are "special categories" of more sensitive personal data which require a higher level of protection. We may collect, store, and use the following categories of personal information about you:

- Contact details;
- References;
- Evidence of qualifications;
- Employment details; and/or
- Information about business and pecuniary interests

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- Information about your health, including any medical condition, health and sickness records;
- Genetic information and biometric data;
- Information about your criminal record; and/or
- Disability and access requirements.

Where you 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. For more information, refer to the Right to Withdraw Consent section of this document.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in compliance with Article 6 of the GDPR, such as the following circumstances:

a) Where we have your explicit consent to do so;
b) Where we need to perform the contract we have entered into with you;
c) Where we need to comply with a legal obligation;
d) Where we need to protect your vital interests;
e) Where it is needed in the public interest or for official purposes; and/or
f) Where we need to protect the legitimate interests of yourself or a third party, unless there is a good reason to protect your personal data which overrides those legitimate interests.

Situations in which we will use your personal information

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

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

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Holding particularly sensitive personal information

We may hold/use your particularly sensitive personal information in the following ways:

- We may hold/use information relating to leaves of absence including the reasons for the leave, which may include sickness absence or family-related leave, sabbaticals, to comply with the law;
- We may hold/use information about your physical or mental health, or disability status, to ensure your health and, and to provide appropriate adjustments, to comply with the Equality Act 2010; and/or
- We may hold/use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Some of our schools use CCTV cameras around their school site for security purposes and for the protection of staff and pupils. CCTV footage may be referred to during the course of investigating other issues. CCTV footage involving governors and volunteers will only be processed to the extent that it is lawful to do so. Please see our CCTV policy for more details.

If you fail to provide 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 the Health & Safety of our Governors and Employees) or we may be unable to discharge our obligations which may be in the public interest or for official purposes.

Change of purpose

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.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

In compliance with Article 9 of the GDPR, when we are processing special category data, such as ethnic origin, religious beliefs and health conditions, we will identify a lawful basis for the processing of such data (as listed within Article 6) and an appropriate special category condition for the processing of the data (as listed within Article 9).

When processing special category data, we will meet at least one of the conditions below:

a) Explicit consent is gained;
b) It is in the interest of employment, social security and social protection;
c) It is in your vital interests;
d) It involves a not-for-profit body;
e) The data is made public by yourself;
f) It is in relation to legal claims or judicial acts;
g) It is in substantial public interest;
h) It is in the interest of health or social care;
i) It is in the interest of public health; and/or
j) It is for the purpose of archiving, research and statistics.

Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- Government departments or agencies – to meet our legal obligations to share information about

governors/trustees;
- Our local authority – to meet our legal obligations to share certain information with it, such as details of governors;
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as governor/trustee support;
- Professional advisers and consultants;
- Employment and recruitment agencies; or
- Police forces, courts.

Why might we share your personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you, where it is needed in the public interest or for official purposes, or where we have your consent.

How secure is your information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data security

Third parties who are processing personal data on our behalf will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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. 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. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the DPO.

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.

Data retention

How long will we use your information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, insurance or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a volunteer or governor of the company we will retain and securely destroy your personal information in

accordance with our Data Retention Policy and applicable laws and regulations.

Rights of access, correction, erasure, and restriction Your duty to inform us of changes

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.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (data subject access request). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the school's Data Protection Lead, or where appropriate the Trust's DPO, in writing.

The legal timescales for the School (or Trust for a non-school based request) to respond to a Subject Access Request (SAR) is one calendar month. As the School has limited staff resources outside of term time, we encourage requestors to submit Subject Access Requests during term time and to avoid sending a request during periods when the School is closed or is about to close for the holidays where possible. This will assist us in responding to your request as promptly as possible. Where the school or Trust believe they will be unable to respond to requests within the given timeframe, the requester will be contacted regarding any potential delays. For further information about how we handle Subject Access Requests, please see our ***GDPR Policy***.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

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 the school's Data Protection Lead or the Trust's DPO. 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.

Data Protection Officer

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

You can contact the Information Commissioners Office on 0303 123 1113 or via email https://ico.org.uk/global/contact-us/email/ or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with 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.

If you have any questions about this privacy notice, please contact the DPO via dpo@stoccat.org.uk