

Privacy Notice for Members / Trustees / Governors

How we use your information 2020/21

Who are we?

Tove Learning Trust is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Tove Learning Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: Z7119841.

You can contact the Academy Trust as the Data Controller in writing at:
Tove Learning Trust, c/o Sponne School, Brackley Road, Towcester, Northamptonshire, NN12 6DJ.

What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our Members, Trustees and Governors.

What is personal information?

Personal information relates to a living individual who can be identified by that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing or genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

What personal information do we process about Members/Trustees/Governors?

We process data relating to those volunteering at our schools and the trust. Personal data that we may collect, use, store and share about you includes, but is not restricted to:

- personal information such as name, any former names, date of birth, address and contact details
- information on occupation for Members and Trustees
- special categories of data including characteristics information such as gender, age, ethnic group, nationality, disability and access information
- Disclosure and Barring Service Certificate number and start date
- information such as start and end dates and length of term as governor
- information on attendance at meetings
- evidence of qualifications and, where relevant, skills associated with the role of governor
- information about business and pecuniary interests
- Personal profiles provided for the Trust/School website.

For what purposes do we use personal information?

The personal data collected is essential, in order for the school to fulfil their official functions and meet legal requirements.

We collect, use and process governor information on a lawful basis (under the General Data Protection Regulation (GDPR) for the following purposes:

a)	Establish and maintain effective governance	In accordance with the legal basis of Public Task ; necessary to perform tasks that schools are required to perform as part of their statutory function and in terms of any special category data, with Article 9 of the GDPR. Details of the type of processing under this basis and who we may share that information is set out in Table 4.
b)	Undertake equalities monitoring	
c)	Ensure that appropriate access arrangements can be provided for volunteers who require them	
d)	Facilitate safe recruitment, as part of our safeguarding obligations towards pupils	In accordance with the legal basis of Vital interest ; to keep children safe. Details of the type of processing under this basis and who we may share that information is set out in Table 2.
e)	Meeting statutory obligations for publishing and sharing details	In accordance with the legal basis of Legal Obligation ; data collected for DfE census information. Details of the type of processing under this basis and who we may share that information is set out in Table 1. We may need to seek your consent to process some personal information; in these circumstances we will provide you specific and explicit information regarding the reasons the data is being collected and how the data will be used. Details of the type of processing under this basis and who we may share that information is set out in Table 3.

Collecting personal information

Whilst the majority of personal information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, 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 and what we will use this information for.

Who might we share your information with?

We do not share information about our governors unless the law and our policies allow us to do so. We specifically do not pass on your details to third parties for marketing purposes.

We routinely share Member/Trustee/Governor information with:

- our local authority, the Department for Education (DfE) via secure data collection returns
- the ESFA via secure access website for compliance purposes
- Companies House for statutory purposes [Members and Trustees]
- third party software applications necessary to the running of the school i.e. Go4Schools, BlueSky system for online CPD compliance such as Safeguarding, Child Protection and Recruitment, etc.

Please refer to the tables for information about what personal information is shared with which specific third parties.

What do we do with your information?

All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected. The Trust monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

How long do we keep your information for?

In retaining personal information, the Trust complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the Trust is required to retain the information.

A copy of those schedules can be located using the following link:

<http://irms.org.uk/page/Schools/Toolkit>

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

What are your rights with respect of your personal information?

Under data protection law, Members/Trustees/Governors have the right to request access to information about them that we hold. To make a request for your personal information contact the School Data Protection Officer at Warwickshire Legal Services via email at schooldpo@warwickshire.gov.uk or alternatively;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

****Please ensure you specify which school your request relates to.**

You also have the right to:

- 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
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

If you have any queries about this Privacy notice, please contact GDPR@tovelearning.org.uk

Review

The content of this Privacy Notice will be reviewed annually or where substantial change is required due to a change in the law. This Privacy Notice was last updated July 2020.

Table 1 – Personal information we are required to process to comply with the law

Information Type	Relevant legislation	Special category – additional lawful reason	Third parties with whom we share the information	Lawful reason for sharing
Name	Companies Act 2006 & Academies Act 2010		Companies House DfE CPD database	Statutory requirement
Address	Companies Act 2006 & Academies Act 2010		Companies House DfE	Statutory requirement
Date of Birth	Companies Act 2006 & Academies Act 2010		Companies House DfE	Statutory requirement
Nationality	Companies Act 2006 & Academies Act 2010		Companies House DfE	Statutory requirement
Occupation	Companies Act 2006		Companies House DfE	Statutory requirement
CPD information	Academies Act 2010		CPD database	Statutory requirement

Table 2 – Personal information we are required to process as it is necessary to protect someone's vital interests

Information Type	Special category – additional lawful reason	Third parties with whom we share the information	Lawful reason for sharing
Medical information	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent	Medical staff i.e. paramedics/ Ambulance	Vital Interest
Religious belief	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent	Medical staff i.e. paramedics/ Ambulance	Vital Interest

Table 3 – Personal information we are required to process with the consent of the individual to whom that information ‘belongs’

Information Type	Special category – additional lawful reason	Third parties with whom we share the information	Lawful reason for sharing
Personal profile		Public record on website	Consent of individual
Skills Audit		NA	Consent of individual

Table 4 – Personal information we are required to process because it is necessary to do so in order to perform a public task

Information Type	Special category – additional lawful reason	Third parties with whom we share the information	Lawful reason for sharing
Name		Local Authority	Public task (to establish email address on secure server)
Name		Public Record	Public task (to comply with statutory guidance)
Personal information (Address, DoB, contact information_			
Record of Business Interest		Public Record	Public task (to comply with statutory guidance)