

Privacy Notice: Members, Directors and Parent and Community Advisory Forum (PCAF) Representatives 2024-25

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Approved by:	CFO
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This policy is scheduled for review on:	Annually

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This policy outlines Manor Multi Academy Trust's ('we' / 'our' / 'us') expectations in relation to use of Directors' and PCAF representatives' personal data.

We are committed to equality and value diversity. As such we are committed to fulfilling our Public Sector Equality Duty (Equality Duty) obligations and expect all staff and volunteers to share this commitment.

This policy should also be applied in accordance with our Staff Code of Conduct, Dignity at Work, Safeguarding and Child Protection, Safer Recruitment, and ICT Acceptable Use policies and Procedures. Copies of all policies and procedures can be accessed via the **All MAT Staff** area on Teams.

The Equality Duty requires us to have due regard to the need to:

- Eliminate unlawful discrimination, harassment, and victimisation.
- Advance equality of opportunity.
- Foster good relations between people who share protected characteristics, such as age, gender, race and faith, and people who do not share them.

If you consider that any of our practices, policies or procedures may be indirectly discriminatory, you should report your concerns and the basis for them to your line manager, who will take appropriate action and ensure that you receive a written response in respect of the concerns that you have raised.

This policy does not form part of your contract of employment. We reserve the right to amend or withdraw this policy at any time.

We are responsible for ensuring the effective implementation of this policy. As part of equality monitoring we will review and monitor the operation and impact of the policy on a regular basis and in accordance with the policy review date. As part of this monitoring and review this policy will be equality impact assessed.

Scope

For the purposes of this Privacy Notice, the focus of governance includes our Members, Directors and local PCAF (Parent Community Advocate Forum) representatives.

How we use governance information

We are committed to providing a secure and safeguarded environment for all Members, Directors & PCAF representatives. Security of all data and personal information is of paramount importance and we strongly believe that each and every employee and volunteer has a duty of care to ensure all personal data is treated with the upmost respect and care. It is strongly advised that all Members, Directors & PCAF representatives read this privacy notice

carefully as well as the associated Data Protection, Safeguarding and Child Protection and ICT Policies that encompass our true reflection on our approach to all aspects of operating our secure environment.

It is also very important that you understand that the use of any personal data will be lawfully processed and used for multiple governance related purposes, both during your term of office with our Trust and after, in line with our statutory obligations. We encourage you to question this if you feel this may not be the case and to bring your concerns to the immediate attention of our Data Protection Officer.

The categories of governance information that we may process include:

- personal information (such as name, date of birth, home address and email address)
- personal and business interests
- characteristics information (such as gender, age, ethnic group)
- term of office and meeting attendance information
- professional qualifications and experience
- ID, photographs
- relevant training record for Education establishments
- relevant medical and dietary information, including doctors' details
- DBS (Disclosure & Barring Service) and Section 128 check information – this may include Passport, Utility Bills, Driving License information
- emergency contact details (name and contact number) of spouse, partner or family members

This list is not exhaustive but covers the majority of personal details we may process and hold on record during your term of office (and after) in line with our statutory obligations. This information will be held on an administration restricted area on GovernorHub as well as in secure online cloud-based systems such as the School Single Central Record.

Why we collect and use governance information

We use governance data to:

- meet the statutory duties placed upon us (e.g. Academy Trust Handbook)
- enable review and development of our governance structure, recruitment and retention
- communicate efficiently and effectively with regard to your role

Under the UK General Data Protection Regulation (UK GDPR), the legal basis we rely on for processing personal information for general purposes are (Article 6):

1. Processing shall be lawful only if and to the extent that at least one of the following applies:

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Point (f) of the first subparagraph shall not apply to processing carried out by public authorities in the performance of their tasks.

The purpose of the processing shall be determined in that legal basis or, as regards the processing referred to in point (e) of paragraph 1, shall be necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. That legal basis may contain specific provisions to adapt the application of rules of this Regulation, inter alia: the general conditions governing the lawfulness of processing by the controller; the types of data which are subject to the processing; the data subjects concerned; the entities to, and the purposes for which, the personal data may be disclosed; the purpose limitation; storage periods; and processing operations and processing procedures, including measures to ensure lawful and fair processing such as those for other specific processing situations.

Collecting governance information

We may collect personal information via electronic or manual handwritten form method.

Governance data is essential for our operational use. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with UK GDPR, 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.

Storing governance information

We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please contact dpo@manormat.com.

We hold data securely for all Members, Directors & PCAF representatives. Your information is stored in two secure ways:

1. Manual records will be kept in a secure room within secure locked filing cabinets. Physical access to the storage is limited by key access on both parts.
2. Electronically the information is securely stored on cloud-based infrastructure which is secured on encrypted devices, permissioned with an account password and 2-factor authentication protected accordingly to staff that only require access to this information. Administrative ICT access is allowed for maintenance reasons including backup and retention. It is also a requirement to remove the information as and when the retention schedule on the data ends. Offsite backup location remain on secure 3rd Party provider which is reviewed annually. Information is secured within Manor Multi Academy Trust Microsoft Office 365 cloud environment and again this is account password protected and permissioned accordingly. School policy determines that all information synchronised / stored on devices are account / password or pin protected as well as being encrypted if Windows based. Mobile devices require a minimum of pin code or password protection which are not to be shared. Governor information is also processed and stored on:
 - a) GovernorHub – for communication purposes, minutes of meetings and other administrative notifications
 - b) GIAS (Get Information About Schools) in line with our statutory obligations
 - c) Our Trust and School websites in line with our statutory obligations

Who we share governance information with

We may share this information with:

- The Department for Education (DfE), central government and/or the relevant School's Local Authority
- Training providers
- School staff (where appropriate, usually administrative)
- Law enforcement organisation and courts
- Professional advisers (i.e. Legal)
- Suppliers and service providers (Eg. HR & Payroll)
- Security organisations (including CCTV and signing in systems)
- Press and the media

The above list is not exhaustive but includes current working practices and the potential for information to be shared legally, appropriately and purposefully in the interest of all parties involved.

Why we share school governance information

We do not share information about you with anyone without your consent unless the law and our policies require/allow us to do so.

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the MAT Data Protection Officer dpo@manormat.com.

You also have the right to:

- ask us for access to information about you that we hold
- have your personal data rectified if it is inaccurate or incomplete (it is also your duty to inform us of any personal information changes in a timely manner)
- request the deletion or removal of personal data where there is no compelling reason for its continued processing
- restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you
- 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
- a right to seek redress, either through the ICO, or through the courts

Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting dpo@manormat.com

Please be advised that, if consent to processing your personal data is withdrawn, this could affect your position as a Member/Director/PCAF representative as you will not be able to fulfil your role to its requirement or allow us to perform our legal duties.

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

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time.

Contact:

If you would like to get any further clarification on the information about you that we share with the DfE or how they use your information, please contact:

Name: Neil Beards

Email: dpo@manormat.com

Address: Manor Multi Academy Trust
Ettingshall Road
Wolverhampton
West Midlands
WV14 9UQ

Telephone: 01902 556460

Website: <http://www.manormat.com>

To contact the DfE, please visit: <https://www.gov.uk/contact-dfe>

Breach of Policy

Any breaches of this procedure by staff will be managed under the Trust's Disciplinary Policy and Procedure, which can be located in the **All MAT Staff** area on Teams.