

# **Privacy notice for Members/ Trustee directors/ local committee members and other volunteers**

**The Good Shepherd Trust**



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### 1. Introduction

Under UK data protection law, individuals have a right to be informed about how our school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **individuals working with our trust in a voluntary capacity, including local committee members/trustee directors and Members.**

Our trust, The Good Shepherd Trust, Larch Building, Larch Avenue, Guildford, Surrey GU1 1JY, telephone 01483 910210, is the 'data controller' for the purposes of UK data protection law.

### 2. The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Personal information (such as name, address, email address, phone number, date of birth, proof of identity, photographs)
- Relevant references and signed documentation
- Evidence of qualifications
- Employment details
- Information about business and pecuniary interests
- A biography/ profile that may be published on our website
- Information about your use of our information and communication systems, equipment and facilities (e.g. trust and school computers)

We may also collect, use, store and share (when appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Information about any health conditions you have that we need to be aware of
- Information about disability and access requirements

#### ➤ Photographs and CCTV images captured in school

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and local authorities, and the Disclosure and Barring Service in respect of criminal offence data.

### **3. Why we use this data**

We use the data listed above to:

- a) Establish and maintain effective governance
- b) Meet statutory obligations for publishing and sharing local committee members'/trustee directors'/Members' details
- c) Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- d) Undertake equalities monitoring
- e) Ensure that appropriate access arrangements can be provided for volunteers who require them
- f) Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers and pupils).

We will only use your personal information for the purposes for which we have 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 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.

#### **3.1 Use of your personal data in automated decision-making and profiling**

We do not currently process any [governors'/trustees'] or other volunteers' personal data through automated decision-making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

#### **3.2 Use of your personal data for filtering and monitoring purposes**

While you're in our school, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. child protection policy, IT acceptable use policy) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)

### **4. The lawful basis for using this data**

The lawful bases for processing personal data for the purposes listed in section 3 above are as follows:

- For the purposes of A & B, ((3)) above in accordance with the 'public task' basis – we need to process data to fulfil our statutory function as a school
- For the purposes of C, ((3)) above in accordance with the 'legal obligation' basis – we need to process data to meet our responsibilities under law
- For the purposes of B in accordance with the 'consent' basis – we will obtain consent from you to use your personal data

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

#### **4.1 The basis for using special category data**

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

### **5. Collecting this data**

We will only collect and use your data when the law allows us to (as detailed above in section 4 of this notice). While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts or tribunals
- Other schools or trusts

## **6. How this data is stored**

We keep personal information about you while you volunteer at our school/Trust. We may also keep it beyond your work at our school/ Trust if this is necessary. Our [DATA RETENTION SCHEDULE NEW 2025.docx](#) sets out how long we keep information about local committee members/trustee directors/Members and other volunteers.

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.

We will dispose of your personal data securely when we no longer need it.

## **7. Who data is shared with**

We do not share information about you with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary and it complies with UK data protection law, we may share personal information about you with:

- The local authorities in which our schools and Trust are based, to meet our legal obligations to share certain information, such as safeguarding concerns
- Government departments or agencies
- Regulators, [e.g. Ofsted]
- Suppliers and service providers:
  - HR
  - Filtering and monitoring
- Trust auditors
- Health authorities
- Security organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts and tribunals

## 7.1 Transferring data internationally

We may share personal information about you with international third parties, where different data protection legislation applies.

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you may obtain a copy of these arrangements by contacting the DPO.

## 8. Your rights

### 8.1 How to access personal information held by the Trust

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- Give you a description of it
- Tell you why we are holding it, how we are processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

### 8.2 Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data where it is likely to cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected or blocked
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office if you feel we have not used your information in the right way

- Claim compensation for damages caused by a breach of the data protection regulations

We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

- Your right to have all personal data deleted or destroyed does not apply when the lawful basis for processing is legal obligation or public task
- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests
- Right to object to use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent

See information on types of lawful basis in section 4 of this privacy notice.

To exercise any of these rights, please contact us (see 'Contact us' below).

## 9. Complaints

We are committed to protecting your personal data. If you are unhappy with how we have collected, stored, or used your information - or how we have handled your privacy rights (such as Subject Access Requests) then you have the right to submit a complaint.

### How to submit a complaint

You can raise a data protection concern or complaint through any of the following channels:

- **EMAIL:** contact the DPO Peter Coates at [admin@goodshepherdtrust.org.uk](mailto:admin@goodshepherdtrust.org.uk)
- **POST:** address it to the DPO at Good Shepherd Trust, Larch Building, Larch Avenue, Guildford, Surrey GU1 1JY
- **PHONE:** call the Good Shepherd Trust on 01483 910210

To help us investigate effectively, please include your name, contact details, and a clear description of your concern (including relevant dates and staff you may have spoken to).

### Third Party Complaints

If you are submitting a complaint on behalf of someone else, we require written authority or signed letter of consent from the individual concerned before we can discuss their personal data or share investigation findings with you.

### Our Data Protection Complaints procedure

When we receive your complaint, we will follow these steps:

- **Acknowledgement:** We will acknowledge receipt of your complaint in writing within 5 days
- **Investigation:** Our DPO will review your case. This may involve examining correspondence, reviewing security logs, and speaking to relevant staff
- **Response:** We aim to provide a full written response within one calendar month. If your complaint is highly complex and requires more time, we will notify you and explain the reason for the delay

### Escalation and your right to complain to the regulator

Our response will detail our findings and any remedial actions we have taken. If you are dissatisfied with our final response, you have the right to escalate your complaint directly to the regulatory authority.

You can contact the Information Commissioners Office in the following ways:

- Online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF We take any complaints about our collection and use of personal information very seriously.

## 10. Contact us

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

Our data protection officer is:

➤ Peter Coates – [admin@goodshepherdtrust.org.uk](mailto:admin@goodshepherdtrust.org.uk)

However, the **data protection lead** has day-to-day responsibility for data protection issues in each school.

If you have any questions or concerns or would like more information about anything mentioned in this privacy notice, please contact them at the school direct.