

## Privacy Notice for Governors and Volunteers

**This policy applies to:**

**Francis Holland Regent’s Park   Francis Holland Sloane Square   Francis Holland Prep**

Where there are differences between the schools these have been clearly highlighted.

Policy owner	Trust: Director of Technology
Type of policy	Regulatory – N/A  Informative – Provide information to both pupils and parents as to how their personal information is stored and used.
Last reviewed / approved by / date	SLTs: January 2025 <a href="#">Governance and Nominations: February 2025</a>
Next school review due	Autumn 2025 (light touch)
Next council review due	Governance and Nominations: Autumn 2025
This version published	3 <sup>rd</sup> June 2025
Circulation	<ul style="list-style-type: none"> <li>✓ Trust Website</li> <li>✓ Schools’ Websites</li> <li>✓ Schools’ Sharepoints</li> <li><input type="checkbox"/> FHS People</li> </ul> <p>All policies are available from the Trust Office, Francis Holland Schools Trust, 35 Bourne Street, London, SW1W 8JA</p>
Linked Policies	Data Protection Policy

<b>Revision History</b>	
This section should be completed by the reviewer each time this policy is reviewed	
Changes made [Brief description of edits]	Date
New policy	Spring 2024
Update detail re introduction, Director of Technology as point of contact; DPO change of address June 2025.	Spring 2025

# Privacy Notice for Governors and Volunteers

## Introduction

Francis Holland School Trust (FHST) are committed to being transparent about how we collect and use personal data, and to meeting our data protection obligations. This Privacy Notice describes how we collect, store and use personal information about you during and after your work relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR).

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

This notice applies to governors and volunteers.

## Who Collects This Information?

Francis Holland Schools Trust (FHST) is a “data controller.” This means that FHST are responsible for deciding how FHST hold and use personal information about pupils and parents. Under data protection legislation, FHST are required to notify you of the information contained in this privacy notice. This notice does not form part of any contract to provide services and it may be updated at any time.

It is important that you read this notice with any other policies mentioned within this privacy notice, so that you are aware of how and why FHST are processing your information, what your rights are under data protection legislation and the procedures FHST take to protect your personal data.

## Data Protection Principles

FHST will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy.

## Categories of Information FHST Collect, Process, Hold and Share

We may collect, store and use the following categories of personal information about you:

- Personal information and contact details such as name, title, addresses, date of birth, marital status, phone numbers and personal email addresses;
- Emergency contact information such as names, relationship, phone numbers and email addresses;
- Education details;
- DBS details;
- Employment details;
- Information about business and pecuniary interests;
- Information acquired as part of your application to become a governor;
- Criminal records information as required by law to enable you to work with children;
- Information about your use of our IT, communications and other systems, and other monitoring information;
- Photographs;

- Images captured by the School's CCTV system;
- Video recordings capture by the School's video conferencing platform;
- Details in references about you that we give to others.

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

- Information about your race or ethnicity, religious or philosophical beliefs
- Information about your health, including any medical conditions.

## Collecting This Information

The majority of the information that we collect from you is mandatory, however there is some information that you can choose whether or not to provide to us. 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.

We may collect this information from you directly, or from a number of third-party sources, such as other governors and volunteers, the DBS, technical networks and so on.

## How FHST Use Your Personal Information

We will only use your personal information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Where you have provided your consent;
- Where we need to perform a contract we have entered into with you;
- Where we need to comply with a legal obligation (such as health and safety legislation and under statutory codes of practice);
- Where it is needed in the public interest or for official purposes;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests, rights and freedoms do not override those interests.

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

- To determine appointment and suitability as a governor;
- To deal with election of governors;
- To comply with safeguarding obligations;
- To provide details on our website or online databases 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;
- For education, training and development requirements;
- In order to review governance of the School;
- In order to comply with any legal dispute or any legal obligations;
- In order to comply with regulatory requirements or health and safety obligations;
- To ensure system security, including preventing unauthorised access to our networks;
- To monitor use of our systems to ensure compliance with our IT processes;
- To receive advice from external advisors and consultants;

- To liaise with regulatory bodies (such as the DfE, DBS); and
- Dealing with termination of your appointment;

If you fail to provide certain information when requested, we may be prevented from complying with our legal obligations (such as to ensure health and safety). Where you have provided us with consent to use your data, you may withdraw this consent at any time.

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.

## How FHST Use Particularly Sensitive Personal Information

Sensitive personal information (as defined under the UK GDPR as “special category data”) requires higher levels of protection and further justification for collecting, storing, and using. We may process this data in the following circumstances: -

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations in line with our Data Protection Policy;
- Where it is needed in the public interest, such as for equal opportunities monitoring (or in relation to our pension scheme);
- Where it is needed in relation to legal claims or where it is necessary to protect your interests (or someone else’s interests) and you are not capable of giving your consent.

## Criminal Convictions

We 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 in the course of working for us.

## Sharing Data

We may need to share your data with third parties, including third party service providers where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. These could include the following:

- Government departments or agencies
- The Local Authority
- Suppliers and Service providers
- Professional advisors and consultants
- The Department for Education
- Law enforcement
- Support services;
- DBS.
- Other schools within the trust

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the UK and the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

## Retention Periods

Except as otherwise permitted or required by applicable law or regulation, FHST only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes. Full details on how long FHST keep personal data for is set out in our Data Protection Policy, which can be found on the Trust website.

## Security

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). 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.

You can find further details of our security procedures within our Data Breach Policy and our Cyber Security Policy, which can be found on the Trust website.

It is important that you read this notice with any other policies mentioned within this privacy notice, so that you are aware of how and why we are processing your information, what your rights are under data protection legislation and the procedures we take to protect your personal data.

## Your Rights of Access, Correction, Erasure and Restriction

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

- Access your personal information (commonly known as a “subject access request”). This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances. For further information on how to proceed with a SAR, please see the Trust’s Data Protection Policy.
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.
- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances (for example for direct marketing purposes).
- To transfer your personal information to another party.

If you want to exercise any of the above rights, please contact our DPO in writing.

Judicium Consulting Ltd

5<sup>th</sup> Floor,

98 Theobald’s Road,

London WC1X

[dataservices@judicium.com](mailto:dataservices@judicium.com)

0345 548 7000

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).

## Your 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 Director of Technology. 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.

## How to Raise a Concern

If you would like to discuss anything within this privacy notice or have a concern about the way FHST collects or uses your personal data, FHST requests that you raise your concern with the Director of Technology in the first instance.

FHST have appointed a data protection officer (DPO) to oversee compliance with data protection and this Privacy Notice. If you have any questions about how FHST handle your personal information which cannot be resolved by the Director of Technology, then you can contact the DPO on the details below:

Data Protection Officer: Judicium Consulting Limited  
Address: 5<sup>th</sup> Floor, 98 Theobald's Road, London WC1X 8WB  
Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)  
Web: [www.judiciumeducation.co.uk](http://www.judiciumeducation.co.uk)  
Lead Contact: Craig Stilwell

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues at [Make a complaint | ICO](#)

## Changes to This Privacy Notice

FHST reserves the right to update this privacy notice at any time, and FHST will provide you with a new privacy notice when FHST makes any substantial updates. FHST may also notify you in other ways from time to time about the processing of your personal information.