



Trustee, Governor and Other Volunteers Privacy Policy

Recommended by Operations Director:	June 2026
Approved by Operations Committee:	June 2026
Review Due:	June 2027

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1. Policy Statement

This notice explains what personal data (information) we hold about you, how we collect it, how we use it, and how we may share it. We are required to give you this information under data protection law.

2. Definitions

Term	Definition
Trust	is Marlow Education Trust, Sir William Borlase's Grammar School, West Street, Marlow, SL7 2BR
Department of Education (DfE)	is the government department which deals with education
Local Authority (LA)	is Buckinghamshire County Council
Chair of Trustees	is Sarah Cooper
CEO	is Kevin Ford
School Headteacher	is registered on: https://get-information-schools.service.gov.uk/
Trusts Data Protection Officer (DPO)	is Satswana Ltd, Suite G12 Ferneberga House, Alexandra Road, Farnborough, GU14 6DQ. info@satswana.com
Data Protection Act (DPA)	The UK's primary data protection legislation. It sits alongside and supplements the UK GDPR, including UK-specific provisions, exemptions and enforcement arrangements.
UK General Data Protection Regulation (GDPR)	The UK's version of the GDPR, retained in domestic law. It sets out core data protection principles, rights and obligations, and is supplemented by the DPA 2018. The EU General Data Protection Regulation (EU GDPR) applies within the European Union.
Data (Use and Access) Act 2025 (DUAA)	Amends data protection, digital verification and smart data frameworks. Key education-sector changes include the ability to pause subject access request timescales during school holidays ('stop the clock'), a statutory reasonable and proportionate test for compliance with information rights, and the renaming of the Information Commissioner's Office (ICO) to the Information Commission (IC).
Freedom of Information Act (Fol)	The Freedom of Information Act 2000 discloses information held by public authorities or persons providing services for them and amends the Data Protection Act.

Term	Definition
Educations Act (EA)	The Education Act 1996 consolidates the Education Act 1944 and certain other educational enactments.
Information Commissioners Office (ICO)	The UK's independent regulator for data protection, freedom of information and related rights. It ensures compliance with the Data Protection Act, the Freedom of Information Act, and the UK GDPR, and handles formal complaints. (Formerly known as the Information Commissioner's Office (ICO); renamed under the Data (Use and Access) Act 2025.)
Electronic Platform	An electronic platform is any means the Trust communicates. This could include, but is not limited to, Email, Online Portals, and Social Media platforms.

3.Introduction

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

This privacy notice explains how we collect, store and use personal data about individuals working with our Trust or trust in a voluntary capacity, including governors or trustees.

Our Trust is the 'data controller' for UK data protection law.

Our data protection officer is Satswana Ltd, also known as the Trusts Data Protection Officer (DPO).

This policy must be approved by the governing body and signed by the Headteacher and the Chair of Governors.

4.What data does the Trust process

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

- Contact details.
- References.
- Evidence of qualifications.
- Employment details.
- Information about business and pecuniary interests.

- Information about your use of our information and communication systems, equipment and facilities (e.g. Trust 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 were captured in the Trust.

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 Trusts and social services, as well as the Disclosure and Barring Service, regarding criminal offence data and financial checks.

5. How do we use your personal information

We use your personal information to:

- Establish and maintain effective governance.
- Meet statutory obligations for publishing and sharing the Governor's details.
- Facilitate safe recruitment as part of our safeguarding obligations towards pupils.
- Undertake equality monitoring.
- Ensure that suitable access arrangements can be made available for the required volunteers.
- Ensure that our information and communication systems, equipment, and facilities (e.g., Trust computers) are used appropriately, legally, and in a safe manner.

a. Use of your data for marketing purposes

Where you have given your consent, we may send you marketing information by email or text promoting Trust events, campaigns, charitable causes, or services that may interest you.

You can withdraw consent or ‘opt out’ of receiving these emails or texts at any time by clicking on the ‘Unsubscribe’ link at the bottom of any such communication or by contacting us.

b. Use of Your Data in Automated Decision-Making and Profiling

We do not currently process data from Governors or volunteers through automated decision-making or profiling. If this changes in the future, we will update any relevant privacy notices to explain the processing to you, including your right to object to it.

c. Use of your data for filtering and monitoring purposes

While you are in our Trust **Error! Reference source not found.**, we may monitor your use of our information and communication systems, equipment, and facilities (e.g., Trust 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).

6. How long will your data be kept?

We will retain personal data only for as long as necessary for the purposes for which it was collected or as required by law. We have implemented a data retention policy which sets out the retention periods for different categories of personal data. For example:

- Governor's records: retained for up to 7 years after the Governor leaves the Trust.
- CCTV footage: retained for up to 1 year unless required for an investigation.

We will take reasonable steps to securely delete or anonymise personal data when it is no longer needed.

7. Reasons we can collect and use your personal information

We collect and use your personal information to fulfil our legal obligations and to perform tasks in the public interest. We rely on the following legal bases under the UK GDPR:

- Article 6 (1)(c) - Legal Obligation: The processing is necessary to comply with the law, excluding contractual obligations.
- Article (6)(1)(e) - Public task: the processing is necessary to perform a task in the public interest or for official functions (task or function has a clear basis in law).

When we collect or share 'special category' personal data, we rely on the following legal bases under the UK GDPR:

- Article 9(2)(g) - Reasons of substantial public interest
- We rely on the Equality of opportunity or treatment purpose condition from Schedule 1 of the Data Protection Act 2018 when relying on Article 9(2)(g) to process your special category data.
- Article 9(2)(h) - Health or social care (if a case needs to be stepped up to children's social work services or the management of social care systems or services)
- Article 9(2)(j) - Archiving, research and statistics (for scientific or historical research purposes or statistical purposes)
- Article 9(2)(f) - Legal claims or judicial acts (for the establishment, exercise or defence of legal claims whenever courts are acting in their judicial capacity).

a. Our 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 one of the following conditions for processing as set out in UK data protection law:

- We need to perform or exercise an obligation or right related to employment, social security, or social protection law.
- We need to protect an individual's vital interests (i.e. preserve your life or someone else's life) in situations where you're physically or legally incapable of giving consent.
- The data in question has already been made publicly available 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, scientific, historical, or statistical research purposes, and the processing is in the public interest.

We will only collect and use criminal offence data when we have both a lawful basis, as set out above, and a condition for processing 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. preserve your life or someone else's life) in situations where you're physically or legally incapable of giving consent.
- The data in question has already been made publicly available 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.

8. Collecting this data

While the majority of the information we collect about you is mandatory, some information 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

9. Who do we share your personal information with

We do not share information about you with any third party without your consent, unless required by law or our policies.

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

- Our Local Authority has to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Government departments or agencies
- Our regulator, Ofsted
- Suppliers and service providers:
 - Our Caterer
 - HR Provider
- Our auditors
- Health authorities
- Security organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts and tribunals

10. Your Rights

Under the GDPR, you have rights which you can exercise free of charge, which allow you to:

- Know what we are doing with your information and why we are doing it.
- Ask what information we hold about you (Subject Access Requests).
- Please ask us to correct any errors in our information about you.
- Object to direct marketing.
- Make a complaint to the Information Commission (IC).
- Withdraw consent (if applicable).

Depending on our reason for using your information, you may also be entitled to:

- Ask us to delete the information we hold about you.
- Have your information transferred electronically to yourself or another organisation.
- Object to decisions being made that significantly affect you.
- Object to how we are using your information.
- Stop using your information in specific ways.

We will always seek to comply with your request. However, we may be required to retain or use your information to comply with our legal obligations. Please note: your request may delay or prevent us from delivering your service.

For further information about your rights, including the circumstances under which they apply, see the ICO's guidance on individuals' rights under the GDPR.

If you would like to exercise your rights, please get in touch with our Data Protection Officer (DPO).

11. Keeping your personal information secure

We take the security of personal data seriously and have implemented appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and accidental loss, destruction, or damage. These measures include:

- Regular data protection training for Governors
- Use of strong passwords and encryption
- Regular security assessments and audits
- Secure storage and disposal of personal data
- Restriction of access to personal data to authorised personnel only

In the event of a data breach, we will take appropriate steps to mitigate the impact and comply with our legal obligations, including notifying affected individuals and the Information Commissioner's Office where necessary.

12. Complaints

If you have any concerns about how we handle your data, please don't hesitate to contact our Data Protection Officer (DPO). If you are unsatisfied with our response, you can complain to the Information Commissioner's Office (ICO).

You can contact the IC at:

Information Commission Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Tel: 0303 123 1113

Report a concern online at <https://ico.org.uk/make-a-complaint/>

13. Further information

For more information about the DfE's data-sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>.

For information about which organisations the department has provided pupil information (and for which project), please visit the following:

<https://www.gov.uk/government/publications/national-pupil-database-requests-received>.

To contact DfE: <https://www.gov.uk/contact-dfe>.