



## Governors and Volunteers

# Privacy Notice 2025

This privacy notice describes how we collect and use personal information about you during and after your volunteer relationship with us, in accordance with the UK General Data Protection Regulations (UK GDPR).

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 relates to general personal data processing, the powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

It applies to governors and volunteers.

### Who collects this information?

Red Kite Learning Trust is a 'data controller.' This means we are responsible for deciding how we hold and use personal information about you.

We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice is provided for your information only and 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 understand how we are processing your information, what your rights are under data protection legislation and the measures we take to protect your personal data.

### Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

### The categories of information that we 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 name, relationship, phone numbers and email addresses
- Information collected during the recruitment process that we retain during your engagement with the organisation, including references, DBS details (disclosure number and date DBS certificate is physically seen), proof of right to work in the UK, application form, CV, education and qualifications
- Role information such as start date and post details

- Details of any dependants, if necessary for emergency contact, safeguarding
- Your nationality and immigration status and information from related documents such as your passport or other identification and immigration information
- Criminal records information, where legally required, to confirm your suitability for working with or governing in relation to children
- Trade union membership information where relevant, such as through the collection of subscriptions
- Information on grievances raised by you or involving you, in connection with your role
- Information on conduct/disciplinary issues involving you, in connection with your role
- Performance and capability information – details of any reviews, appraisals, or capability issues relevant to your role
- Professional development records – information about training, continuing professional development (CPD), and other learning activities
- Time and attendance information – records of your attendance and participation in connection with your role
- Systems usage and monitoring information – information about your use of our IT, communications, and other systems, including monitoring data where applicable
- Business-related social media information – details of social media accounts used for business or governance purposes
- Business and pecuniary interests – information about any business or financial interests you are required to declare.
- CCTV images – images captured by the school or Trust's CCTV system
- Public social media information – information from your public social media accounts, but only in very limited circumstances to assess specific risks for particular functions within the school or Trust
- Details included in references we provide to other organisations, where requested and appropriate
- Recordings of meetings conducted via the school or Trust's video conferencing platforms, where applicable
- Photographs taken in connection with your role, for identification, safeguarding, or promotional purposes

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

- Your racial or ethnic origin, gender, gender identity, sexual orientation, religious or similar beliefs
- Information about your health, including any medical conditions and whether you have a disability for which the organisation needs to make reasonable adjustments

### How we collect this information

We may collect this from you directly for example in your application form, or from a number of third-party sources, such as other governors and volunteers, the DBS, technical networks, CCTV, access control systems and any IT system the Trust has in place.

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.

## How we use your 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 we need to fulfil the service arrangement associated with your role
- Where we need to comply with a legal obligation (such as health and safety legislation, safeguarding requirements, or 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
- When you have provided us with consent to process your personal data

We need all the categories of information in the list above primarily to enable you to carry out your role within the organisation and to ensure that we meet our legal and regulatory obligations.

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

- To determine your appointment and suitability as a governor;
- To manage the 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 receive advice from external advisors and consultants
- To liaise with regulatory bodies (such as the DfE, DBS)
- To carry out vetting and screening of applicants in accordance with regulatory and legislative requirements
- In order to manage internal policy and procedure
- To monitor and manage access to our systems and facilities in order to protect our networks and personal data and for the purposes of safeguarding
- To monitor and protect the security of our network and information, including preventing unauthorised access to our computer network and communication systems and preventing malicious software distribution



- Prevention and detection of fraud or other criminal offences
- To defend the school or Trust in respect of any investigation or court proceedings and to comply with any court or tribunal order for disclosure
- Managing the termination of your appointment

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Further information on the monitoring we undertake in the workplace and how we do this is available in our [Equality Scheme](#).

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 we use particularly sensitive information

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

- In limited circumstances, with your explicit written consent
- Where we need to carry out specific legal obligations in line with our data protection policy
- Where it is needed in the public interest, such as for equal opportunities monitoring
- Where it is necessary to assess your ability to carry out your role on health grounds, subject to appropriate confidentiality safeguards. Less commonly, we may process this type of information where it is required in connection with legal claims, or where it is necessary to protect your vital interests (or those of another person) and you are not capable of giving consent

We will use this information in the following ways:

- Recording information about any leave of absence from your role, where relevant (for example, governor meeting attendance)
- To comply with legal and regulatory obligations
- Collecting information about your physical or mental health, or disability status, to ensure your wellbeing, to meet safeguarding requirements, and to provide appropriate adjustments to support your role
- Collecting information about your race, ethnic origin, religion or belief, or sexual orientation, for the purposes of equal opportunities monitoring and reporting

## 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. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

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 during the course of your volunteering or governance role with us.

## Sharing data

We may need to share your personal information with third parties, including service providers, where required by law, where it is necessary to administer your role as a governor or volunteer, or where we have another legitimate interest in doing so. These may include:

- Department for Education (DfE)
- Government departments or agencies
- Companies House
- DfE Get Information About Schools (GIAS)
- Suppliers and Service providers
- Ofsted
- Prospective employers or boards
- Welfare services (such as social services)
- Law enforcement officials such as police
- Local Authority Designated Officer (LADO)
- Professional advisors such as lawyers and consultants
- Support services (IT support, information security)
- Local authority
- Occupational health
- DBS
- Other schools within the Trust
- Some data may be shared with AI systems – Please refer to our Trust AI Policy for further information on this

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, the school/Trust only retains personal data 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.



Once you are no longer engaged with the school/Trust in your role as a governor or volunteer, we will retain and securely destroy your personal information in accordance with our data retention policy. This can be found on our Trust website or by clicking [Red Kite Learning Trust Policies \(rklt.co.uk\)](https://www.rklt.co.uk).

## 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 Protection Policy found on our Trust website or by clicking [Red Kite Learning Trust Policies \(rklt.co.uk\)](https://www.rklt.co.uk).

## Your rights of access, correction, erasure and restriction

It is important that the personal information we hold about you is accurate and current. Please let us know if your personal information changes during your engagement with us in your role as governor or volunteer.

You can view and manage basic personal information including address, contact and emergency contact details by contacting our HR Team [HR@rklt.co.uk](mailto:HR@rklt.co.uk).

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 full copy of the personal information that 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
- 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 to establish its accuracy before processing it
- To object to processing in certain circumstances (for example, direct marketing purposes)
- To transfer your personal information to another party

If you want to exercise any of the above rights, please contact the Data Protection Lead for your school or office in the first instance.

Should you require further advice from the Trust Office, please contact the team in writing: [info@rklt.co.uk](mailto:info@rklt.co.uk) or call 01423 574410.

We may need to request specific information from you to help us to confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

### **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 Data Protection Lead for your school or office in the first instance.

Should you require further advice from the Trust Office, please contact the team in writing: [info@rklit.co.uk](mailto:info@rklit.co.uk) or call 01423 574410.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we have another legitimate basis for doing so in law.

### **How to raise a concern**

We hope that the Trust can resolve any query you raise about our use of your information in the first instance.

We have appointed a Data Protection Officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by the Trust then you can contact the DPO directly:

**Data Protection Officer:** HY Education

HY Education Solicitors Limited

**Address:** Sandbrook House, Sandbrook Way, Rochdale, OL11 1RY

**Email:** [dpo@wearehy.com](mailto:dpo@wearehy.com)

**Telephone:** 0161 543 8884

**Web:** <https://hyeducation.co.uk>

You have a right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues.

### **Changes to this privacy notice**

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

**Red Kite Learning Trust (RKLT) [December 2025]**