

## Octavo Governance – Existing Governors Privacy Policy

Octavo Governance wish to confirm our position regarding the data we keep on our governor database. This will apply to both new and existing governors and clerks who either have, or will have, a current record on our governor database.

What personal information do we have about you?

We have a range of information about you and this has been obtained solely from the information you have provided us with. This includes:

- Title
- Name
- Address
- Contact details
- Whether or not you have a disability for which the organisation needs to make reasonable adjustments

We no longer collect personal information regarding equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, age and religion or belief. Where we have this information, it has been deleted.

### *Why does Octavo Process Personal Data?*

The organisation needs to process data to take steps to facilitate your role as governor. The lawful basis for doing this is dependent initially on your consent.

We are required, on behalf of Croydon and Bromley Local Authority to manage the process for Local Authority Governors for maintained schools, and in relation to this aspect of our work, we rely on the public task reason for processing your data.

It is also in our legitimate interests to process the data as part of our business is to support the governing boards of schools over and beyond the public task duty of sourcing Local Authority Governors. We have considered whether or not those interests are overridden by the rights and freedoms of applicants and have concluded that they are not.

This data is used for:

- Contacting a governor in the event of an emergency, such as a safeguarding issue
- Arranging attendance at courses
- Informing governors of forthcoming governor professional development and significant changes to legislation
- Informing Governors of relevant information as directed by the relevant Local Authority

### *How We Protect Your Data*

Octavo takes the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

Octavo utilises and expands on the National Cyber Security Centre (NCSC) Cyber Essentials Framework to secure our data. Data is protected by firewalls, local and domain passwords or personal identification numbers. All mobile devices are encrypted. Octavo limit the access to data by applying network policies using Microsoft Windows Active Directory, Microsoft 365 Security and Compliance or an appropriate mobile device management system solution. All Microsoft Windows devices are protected with anti-virus software which is updated regularly. This protection includes potential unwanted applications (PUA) and malware. All Microsoft Windows devices are configured to regularly download operating and application updates. All data stored on Octavo servers is backed up daily to a secure remote off-site backup service.

### *Where We Store Your Data and Who Will See It*

Octavo Partnership uses encrypted devices to carry out this work and uses Octavo Partnership systems and FrontLine Data as a third party for data storage. Paper files are stored using Octavo Partnership security.

The data is only processed by Octavo Governance staff. Personal contact details for the Chair of Governors is only shared with the relevant LA in exceptional circumstances, for example in the event of a fraud investigation, safeguarding issue or allegation against the Head teacher.

### *How Long We Keep Your Data*

Governor Records are retained for a period of 1 year after their term of office has finished. Then the account is deleted, and the data is encrypted, so that only a sequential number and dates of the term can be retrieved. No data will remain which can identify the governor.

Your rights in relation to the data Octavo holds about you:

As a data subject, you have a number of rights. You can:

- Withdraw consent for us to process your data
- Access and obtain a copy of your data on request
- Require us to change incorrect or incomplete data
- Require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- Ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data

If you would like to exercise any of these rights, please contact [octavogovernance@octavopartnership.org](mailto:octavogovernance@octavopartnership.org)

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner <https://ico.org.uk/>

### *Data Protection Officer*

We are not required to appoint a Data Protection Officer under the GDPR but have decided to do so voluntarily and our Data Protection Officer is Mr. Jolyon Roberts.

To contact our Data Protection Officer please email [enquiries@octavopartnership.org](mailto:enquiries@octavopartnership.org) and state 'FAO Data Protection Officer' or write to:

Data Protection Officer  
Octavo Partnership  
4th Floor, The Clock Tower  
Katharine Street  
Croydon  
CR9 1ET

Octavo Governance are happy to discuss any questions you may have regarding the use of your data which you feel have not been satisfactorily answered by the above. You should, in the first instance, direct your enquiry to the Octavo Governance email address.

*Updated 25 May 2018*



**Octavo Governance**

*Working with you to improve the life chances of children  
through outstanding school*

 [octavogovernance@octavopartnership.org](mailto:octavogovernance@octavopartnership.org)

 020 8241 5486

 @OctavoGovernors