

Existing Governors / Trustees / Clerks Privacy Policy

Octavo Governance

Providing Trustees, Governors and Clerks with professional development, advice and consultancy, enabling Boards to deliver robust governance to jointly lead and manage schools, achieving the best outcomes for their pupils



 octavo.governance@croydon.gov.uk

 020 8241 5486

1. Brief introduction

We wish to confirm our position regarding the data we keep on our governor / trustee and clerk database. This will apply to both new and existing governors / trustees and clerks who have a current record on our governor / trustee database.

2. What information is collected

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

- Title.
- Name.
- Address.
- Telephone Numbers.
- Email address.
- Where you are a governor / trustee / clerk.
- Whether or not you have a disability for which we need to make reasonable adjustments.

3. Who we share the information with

The data is only processed by Croydon Council's Governance Team (operating under the 'Octavo' name). Only the personal contact details for the Chair of Governors is shared with the relevant LA in exceptional circumstances, for example in the event of a fraud investigation, safeguarding issue or allegation against the CEO / Head teacher.

4. The purposes and legal basis for the processing

We need to process data to take steps to facilitate your role as governor / trustee. The lawful basis for doing this is dependent initially on your consent.

We are required, on behalf of Croydon and Bromley Local Authorities 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 work to support the 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 / trustee in the event of an emergency, such as a safeguarding issue.
- Arranging attendance at courses.
- Informing governors / trustees of forthcoming governor / trustee professional development and significant changes to legislation.
- Informing governors / trustees of relevant information as directed by the relevant Local Authority.

5. Storing the information

We take the security of personal data seriously. The Council has internal policies and controls in place to ensure your data is not lost, accidentally destroyed, misused or disclosed and to ensure that data is not accessed, except by those who have lawful authority in connection with the proper performance of their duties.

We recognise that the personal data we hold is valuable and must be managed properly as accidental loss, unlawful destruction or damage may cause distress to individuals concerned. Examples of our security processes include:

- Encryption - meaning that information is hidden so that it cannot be read without special knowledge (such as a password). This is done with a secret code or what is called a “cypher”. The hidden information is said to then be “encrypted”.
- Controlling access to systems and networks allows us to stop people who are not allowed to view personal information from getting access to it.
- Regular testing of technology and upgrading security measures including keeping up to date on the latest security updates (commonly called “patches”).
- Training of staff to make them aware of how to handle personal information and how and when to report when something goes wrong.

Where the Council engages third parties to process personal data on its behalf such parties do so on the basis of written instructions and are obliged to implement appropriate technical and organisational measures to ensure the security of data in accordance with the Council’s policies, the outcome of any Data Processing Impact Assessment and the standards required by the 2018 Act.

It is your responsibility to inform us when you are no longer a governor / trustee. Governor / Trustee records are retained for a period of 1 year after the 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 of office can be retrieved. No data will remain which can identify you.

6. Requesting access to your personal data

You have the right to ask us for a copy of the personal information that we hold on you. Please email octavo.governance@croydon.gov.uk. If you feel the information we hold on you is inaccurate, you can ask for it to be corrected. If your data is incomplete or out of date, you can ask us to update it by adding more details.

7. Consent

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.
- Instruct us to change incorrect or incomplete data.
- Instruct 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 our legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact:
octavo.governance@croydon.gov.uk

8. Contact details for the Data Protection Officer

If you believe that we have not complied with your data protection rights, you can complain to our Data Protection Officer at DPO@croydon.gov.uk.

9. The right to lodge a complaint with the ICO

If you believe that we have not complied with your data protection rights, after contacting our Data Protection Officer, you can complain to the Information Commissioner via casework@ico.org.uk. Further information can be found on the Information Commissioner website <https://ico.org.uk/>.

10. Council's Corporate Privacy Notice

You can find our corporate privacy notice at www.croydon.gov.uk/council-and-elections/privacy-and-open-data/privacy-notice/corporate-privacy-notice