



# The Eliot Bank and Gordonbrock Schools Federation



## PRIVACY NOTICE

**THE ELIOT BANK AND GORDONBROCK PRIMARY SCHOOLS FEDERATION  
(Data Controller under UK data protection law)**

Data Protection Officer – Lewisham School's SLA  
c/o Thorpewood Avenue, London, SE26 4BU

**This privacy notice will be made available to all governors and volunteers of The Eliot Bank and Gordonbrock Federation to explain how you use their personal information.**

### 1. Introduction

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

This privacy notice explains how we collect, store and use personal data about individuals working with The Eliot Bank and Gordonbrock Schools Federation in a voluntary capacity, including school governors.

Our data protection officer is Mr Stephen Williams, Data Protection Officer – Lewisham School's SLA (see 'Contact us' below).

### 2. The Personal Data We Hold

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

- personal identifiers, contacts and characteristics (such as name, date of birth, contact details and postcode)
- governance details (such as role, start and end dates and governor ID)
- Disclosure and Barring information outcomes, where the outcome is clear to recruit
- Barred List check outcome (only if governor/volunteer is in regulated activity)
- Overseas certificates of conduct, where applicable
- Information about business and pecuniary interests
- Section 128 check outcomes - Direction to hold office as a governor of a maintained school  
(GOVERNORS ONLY)

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 disability and access requirements
- Photographs and CCTV images captured in school

### **3. Why We Use This Data**

We use the data listed above to:

- a) Establish and maintain effective governance
- b) Meet statutory obligations for publishing and sharing governors details with the DfE and GIAS
- c) Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- d) Undertake equalities monitoring
- e) Ensure that appropriate access arrangements can be provided for volunteers who require them

#### **3.1 Use of your personal data in automated decision making and profiling**

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

### **4. Data Collection Requirements**

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

The department may share information about school governors with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested; and
- the arrangements in place to securely store and handle the data

To be granted access to school governance information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

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

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

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

## **5. Our Lawful Basis For Using This Data**

We collect and use your information under Article 6, (1) e) of the UK GDPR, where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller and Article 9 (2) b) of the UK GDPR, where special categories of data can be processed for the purposes of carrying out the obligations and exercising specific rights of the data controller.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

## 5.1 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 have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public 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 purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

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

## 6. Collecting This Data

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

## 7. How We Store This Data

We keep personal information about you while you are a governor or a volunteer at our school. We may also keep it beyond your work at our school if this is necessary. Our Data Protection Policy sets out how long we keep information about governors and other volunteers.

Under the current data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, please contact the our Federation Business Manager, Simone McAllister or the Data Protection Officer – Lewisham School's SLA (see 'Contact us' below).

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We are doing this by:

- Using secure, encrypted servers
- Ensuring end-to-end encryption of data transfers and communication
- Protecting all our IT software packages with individual passwords
- Keeping paper records to a minimum and store those in a locked cupboard only accessible by the Executive Headteacher, Head of School and Federation Business Manager / SAO (for Gordonbrock)

We will dispose of your personal data securely when we no longer need it.

## 8. Who We Share Data With

We do not share information about you with any third party without consent unless the law and our policies allow us to do so.

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 (London Borough of Lewisham) – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Government departments or agencies (i.e. DfE, GIAS)
- The Disclosures and Barring Service
- OFSTED
- Our auditors
- Health authorities
- Security organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

### 8.1 Transferring data internationally

We may share personal information about you with the following international third parties, where different data protection legislation applies:

- Other schools or educational establishments
- Government departments or agencies
- Security organisations
- App or cloud server providers

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

## 9. Your Rights

### 9.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

### 8.2 Your other rights regarding your data

Under UK data protection law, you have certain rights regarding how your personal data is used and kept safe.

For example, you have the right to:

- Object to our use of your personal data for other than the aforementioned lawful purposes.
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

## 10. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## 11. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact If you would like to discuss anything in this privacy notice, please contact:

Simone McAllister  
Federation School Business Manager  
Data Controller – Eliot Bank Primary School  
c/o Eliot Bank Primary School  
Thorpewood Avenue  
London  
SE26 4BU  
Email: [admin@eliotbank.lewisham.sch.uk](mailto:admin@eliotbank.lewisham.sch.uk)

or



Anne Carter  
Senior Administration Officer  
Data Controller – Gordonbrock Primary School  
c/o Gordonbrock Primary School  
Amyruth Road  
London  
SE4 1HQ  
Email: [admin@gordonbrock.lewisham.sch.uk](mailto:admin@gordonbrock.lewisham.sch.uk)

or

Mr Stephen Williams  
Data Protection Officer – Lewisham School's SLA  
c/o Eliot Bank Primary School  
Thorpewood Avenue  
London  
SE26 4BU  
Tel. 020 8314 9928  
Email: [schoolsdpo@lewisham.gov.uk](mailto:schoolsdpo@lewisham.gov.uk)