Privacy Notice for Governors & Volunteers

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This privacy notice describes how we collect, use and process personal information about you during and after your working relationship with us, in accordance with UK data protection law.

UK data protection law currently comprises the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data (Use and Access) Act 2025, each as amended from time to time.

Following the UK's departure from the European Union, the UK GDPR forms part of the domestic data protection framework. The UK GDPR sits alongside the Data Protection Act 2018 and the Data (Use and Access) Act 2025, which supplement and tailor the UK data protection regime, including provisions relating to regulatory powers, enforcement and specific processing activities.

The EU General Data Protection Regulation (Regulation (EU) 2016/679) continues to apply within the European Union and is referred to in this notice as the "EU GDPR" where relevant.

It applies to governors and volunteers.

Who Collects this Information

The Aurora Group is a "data controller." This means that 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 does not form part of any contract of employment or other contract to provide services, and we may update this notice at any time.

It is important that you read this notice, together with any other policies referenced in this privacy notice, to be aware of how we process 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.

Categories of Information 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 names, relationship, phone numbers and email addresses;
- Education details;
- DBS details;
- Employment details;
- Information about business and pecuniary interests;
- Information acquired as part of your role as a governor;
- Criminal records information as required by law to enable you to work with children;
- Information about your use of our IT, communications and other systems, and other monitoring information;

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- Photographs;
- Images captured by the Aurora's CCTV system;
- Video recordings capture by the Aurora's video conferencing platform;

How We Collect this Information

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 it 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.

We may collect this information from you directly, or from a number of third-party sources, such as other employees, the DBS, technical networks and so on.

How We Use Your Information

We will only use your personal information when the law allows us to. The lawful bases we rely on include

- **Consent** – Where you have given clear permission for us to use your personal information for a specific purpose. You can withdraw consent at any time. Examples include optional training, newsletters, or invitations to school or residential home events.
- **Contract** – Where processing is necessary for your role or to take steps at your request before entering into a formal agreement.
- **Legal obligation** – Where we must process information to comply with the law. Examples safeguarding and health & safety obligations.
- **Vital interests** – Where processing is necessary to protect someone's life. Examples include responding to medical emergencies.
- **Public task** – Where processing is necessary to carry out tasks in the public interest or to exercise official authority, such as reporting to regulators, safeguarding, or fulfilling governance responsibilities.
- **Legitimate interests** – Where processing is necessary for our legitimate business interests and we have ensured it does not override the rights and freedoms of individuals. Examples include CCTV.
- **Recognised legitimate interests** – Where processing is necessary for a legitimate interest that is recognised by law or official guidance, and it does not override your rights and freedoms. Examples include ensuring the safety and security of staff, volunteers, children, and residents, managing internal communications, monitoring compliance with policies, and planning activities or services effectively.

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 our legal obligations in line with our data protection policy;
- Where it is needed in the public interest, such as for equal opportunities monitoring (or in relation to our pension scheme);
- Where it is needed in relation to legal claims or where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent.

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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.

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 in the course of working for us.

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

- To determine suitability as a governor;
- To comply with safeguarding obligations;
- To provide details on our website or online databases about governors;
- To communicate with third parties and other stakeholders;
- 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 Service;
- 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 ensure system security, including preventing unauthorised access to our networks;
- To monitor use of our systems to ensure compliance with our IT processes;
- To receive advice from external advisors and consultants;
- To liaise with regulatory bodies (such as the DfE, DBS); and
- Dealing with termination of your appointment;

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.

Sharing Data

We may need to share your data with third parties, including third party service providers where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. These include the following:

- Government departments or agencies
- The Local Authority
- Suppliers and Service providers
- Professional advisors and consultants
- The Department for Education

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- Law enforcement
- Support services;
- Third-party software providers
- DBS.
- Other schools within the Aurora Group

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 Aurora Group only retains personal data for 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 a governor or volunteer of the Aurora Group we will retain and securely destroy your personal information in accordance with our data retention policy. This can be provided upon request.

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.

Details of our security procedures within our Data Breach policy and our Information Governance policy can be provided upon request.

Your Rights of Access, Correction, Erasure and Restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

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 copy of the personal information 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 us to establish its accuracy before processing it.

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- To object to processing in certain circumstances (for example for direct marketing purposes).
- To transfer your personal information to another party.

If you want to exercise any of the above rights, please contact our Data Protection Officer in writing.

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 our DPO in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

How to Raise a Concern

If you have any concerns about how we handle your personal data, we encourage you to contact us in the first instance so we can try to resolve the issue.

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, then you can contact the DPO on the details below: -

Data Protection Officer: Marie Turner
Email: marie.turner@the-aurora-group.com

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

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

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.

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