

Privacy Statement for Governors' Information and Data

How the College uses your personal information

General principles on how we manage personal information:

- We will take care to collect only such information from you as we need to be able to fulfil our statutory duties, and to communicate with you effectively.
- We will only share your information with organisations where we have a legal duty to do so. We will be clear to you about who these organisations are.
- We will maintain a high level of IT system security in order to keep your information protected and safe.
- We will ensure that our staff understand and maintain their responsibilities in protecting personal information.

We are the data controller of personal information about you. We are Sparsholt College (incorporating Andover College). Our address is Westley Lane, Sparsholt, Winchester, Hampshire SO21 2NF.

Our Data Protection Officer is Scott Hermiston. If you have any questions about this policy or the ways in which we use your personal information, please contact our Data Protection Officer by mail at the above address, by email at data.protection@sparsholt.ac.uk or by telephone at 01962 673288.

This privacy notice has been prepared in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Data Protection Act 2018.

Throughout this document, "Personal Information" refers to Personal and Sensitive information (special category). The two categories are separated where appropriate.

Governors' data

What would you like to know about?

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- [how we monitor your use of the College's IT; and](#)
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The information that you give us

For the purposes of administration and communication, we collect personal information from our governors.

Personal

Name, address, telephone number (home and/or mobile), email address, date of birth, personal interests, skills, eligibility criteria, bank account information for expenses, details of expenses claimed, images (photographs or videos).

Sensitive Personal

Ethnicity, learning difficulties and/or disabilities, special needs details.

We are very careful about maintaining privacy for items in this category, and ensuring data is only shared where there is a legal obligation to do so.

The uses made of your personal and sensitive information

We will use your information to manage and administer the working of our Board of Governors.

Your contact details will be used to communicate directly with you regarding the official business of the Board of Governors and any College events to which we may wish to invite you.

Your telephone number and email address are shared with other governors for the purpose of communication between governors and with selected members of staff for the purpose of arranging meetings and visits. Your email address is shared with co-opted committee members for the purpose of communication between committee members.

The personal interests you declare on appointment and annually are held in the College's Register of Interests which is available for public inspection in line with the Instruments and Articles of Government.

Your date of birth and sensitive personal information are used to monitor and to report to the Board of Governors on the diversity of the membership of the Board and to make any special arrangements required to support you to undertake your duties. Your skills information is used to monitor and report to the Board of Governors on the skills mix of governors.

Your bank account information, where supplied, is held by the Clerk to the Corporation and the Finance Office for the purpose of payment of expenses via BACs.

Your eligibility declaration on appointment, and any subsequent updates, are used by the Clerk to the Corporation to confirm that you are a fit and proper person, eligible to be appointed and to continue to be a member of the Board in line the Instruments and Articles of Government.

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Individual and group images of governors may be taken at College events and meetings and used for the purpose of internal communications and/or in external publicity material as part of the College's marketing activities.

The legal basis on which we collect and use your personal and sensitive information

Generally, the information is collected and processed as part of our public interest task of providing education. Where that information is special category (sensitive) personal information, we will process it because there is a substantial public interest for us to do so (for example in order to measure diversity and inclusion).

How long we keep your personal and sensitive information

Governors' records are maintained for the statutory minimum of 7 years. Sensitive information will be retained in an anonymised statistical form after governors leave office, in order that the College can measure trends in diversity and inclusion amongst members. The College will seek the permission of governors leaving office to retain a record of their contact details to enable the College to invite former governors to College events and to contribute to aspects of the College's governance. Permission to retain such records may be revoked, and the records deleted/destroyed at any time thereafter, at the request of the former governor.

How we share your personal and sensitive information

We may share the personal information that you give us or that we hold about you with the following organisations (or types of organisation) for the following purposes:

The Department for Education (including the Education and Skills Funding Agency (ESFA), Ofsted and the Office for Students)

The Financial Memorandum with the ESFA requires us to report the name of the Chairman and Principal to the ESFA. The name of the Chairman and Principal is also reported to the Secretary of State and the FE Commissioner.

Ofsted may require the College to provide the names and contact details of governors in order to communicate with governors about an inspection, although correspondence will usually be via the Principal or Clerk to the Corporation.

The Office for Students requires the College to share with them some personal data about the members of Board of Governors, as part of their approval process for our Higher Education provision.

From time to time, the UK government changes the way it organises education, and/or changes the names of the agencies which govern education in England. For this reason, the list of public education agencies that we will share your information with cannot be exhaustive, but we will only share your information with such agencies where there is a legal requirement for us to do so.

Membership/Subscriber Bodies and Joint Ventures

We share the names of the Chairman and Principal with the Association of Colleges (AOC), Landex, Cultiva Limited and the National Land Based College. We also share anonymised information about

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governors with the AOC and Landex for the purpose of completing surveys about membership of college boards.

We will seek your permission to share other personal information if requested to do so.

Internal and External Auditors

The internal and external auditors have access to all papers and minutes of meetings of the Board and its committees and the minutes. The auditors also have access to the Register of Interest and consolidated governors' expenses data as part of the annual regularity audit which is a requirement of the ESFA's Post 16 Audit Code of Practice.

The auditors do not normally request personal information relating to governors, beyond the information contained in formal papers and minutes. If additional personal information is a requirement of the auditors to complete their work, we will supply it for the specified purpose, but this will not include data of a sensitive personal nature.

The Public

We seek the permission of governors on appointment to publish your profile on our College website to provide transparency about membership of the Board of Governors.

Details of governors' attendance and contributions at Board and Committee meetings are published on our website via the minutes and the Annual Report and Financial Statements in line with the Instruments and Articles of Government and the ESFA's College Accounts Direction. This information will be published up to 24 months after a person has ceased to be a governor in order that the College can complete year-end reporting.

Members of the public are also permitted to access the Register of Interests in line with the Instruments and Articles of Government.

Members of the public may view images of governors attending College events in publicity and marketing material, including via the College's websites and social media.

Other External Organisations

The College will not communicate or share your information with any other external bodies without first asking for your permission to do so.

How we transfer your personal and sensitive information outside Europe

We do not store or transfer your personal data outside Europe.

How we monitor your use of the College's IT

We keep an eye on how everybody uses the College's equipment and computers and what websites are visited when users are browsing the internet at College. Online activity is monitored using specialist software that watches for the use of key words identified as being connected with activities contrary to the College's IT Acceptable Use Policy. This is because we have legal obligations to protect members of the College community, and we also have a legitimate interest in making sure users are using our computer equipment correctly and are not looking at any inappropriate content.

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If you want to browse the internet privately, you will need to use your own devices which are not linked to the College's network or internet connection.

Your rights over your personal and sensitive information

You have a number of rights over your personal information, which are:

- the right to make a complaint to the Information Commissioner's Office (ICO) if you are unhappy about the way your personal data is being used – please refer to the ICO's website for further information about this (<https://ico.org.uk/>);
- the right to ask us what personal information about you we are holding and to have access to a copy of your personal information;
- the right to ask us to correct any errors in your personal information;
- the right, in certain circumstances such as where our use of your personal information is based on your consent and we have no other legal basis to use your personal information, to ask us to delete your personal information;
- the right to request that we restrict the use that we are making of your personal information;
- the right to ask us to review and explain our legitimate interests to you; and
- the right, where our use of your personal information is carried out for the purposes of an agreement with us and is carried out by automated means, to ask us to provide you with a copy of your personal information in a structured, commonly-used, machine-readable format.

These rights and some clarifications and explanations can be seen in our Data Protection Policy, available via our website.