Privacy Notice – Governors of the Corporation and Directors of Franklin College Trading Limited

Franklin College Trust's data protection vision is to create a culture of protecting privacy and personal data. Personal data is information which 'relates to and identifies a living individual'. Personal data should be adequate, relevant and limited to what is necessary.

Categories of information that the Trust collects, holds and shares include:

- Personal information (such as name and address)
- Characteristics (such as ethnicity, language, nationality, country of birth)
- Attendance information of meetings
- Recruitment Data (e.g. governor selection)
- Criminal Convictions (part of the DBS checks)
- Legal requirements (e.g. Single Central Register, Register of Interests).

Why does the Trust collect and use governor/director information?

The Trust collects and uses governor/director information under Article 6 (1) of the General Data Protection Regulation 2016:

i. Processing is necessary for compliance with a legal obligation to which the controller is subject
ii. Processing is necessary in order for us to carry out a public task.

The Trust uses governor/director data:

- to provide appropriate support, care and guidance
- to allow the governors/directors to perform their duties within the Trust/College
- to assess the quality of services
- to comply with the law regarding data sharing.

The Trust will use the information provided in a manner that conforms to the Data Protection Act 2018, the General Data Protection Regulation 2016 and the Human Rights Act 1998.

The Trust does not undertake any automated decision making.

The Trust is committed to being transparent about how it collects, uses, stores and deletes data and to meeting its data protection obligations.

Collecting information

Whilst the majority of information provided to the Trust by governors/directors is mandatory, some of it is provided on a voluntary basis. In order to comply with the General Data Protection Regulation, the Trust will inform a governor/director whether they are required to provide certain information to the Trust or if they have a choice in this.

Storing data (how long is data held for)

Retention of records is based on the principle that governor/director personal data will not normally be kept for longer than is broadly necessary. Data retention times are outlined in a separate Data Retention Policy.

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How the College transfers governor/director personal information outside of the EEA

The College does not transfer governor/director personal data outside of the EEA.

Why the Trust shares information

The Trust does not share information about governors or directors with anyone without consent, unless the law and Trust/College policies allow this.

The Trust is required to share information about governors/directors with the Data Barring Service (DBS)

DBS Personal Information Charter: https://www.gov.uk/government/organisations/disclosure-and-barring-service/about/personal-information-charter

With whom does the Trust share information?

The Trust routinely share information with:

- Disclosure Barring Service (DBS)
- Funding Agency ESFA
- Sixth Form College Commissioner
- AoC, SFCA (Chair of Board of Directors Only).

The Trust occasionally shares information with:

- Police / Emergency Services
- Cull Micro Imaging (scanning bureau)
- Department for Education
- College External Auditors.

Otherwise, before sharing information with a third party, the Trust will either obtain a governor/director's consent or establish that the sharing is necessary (which includes ensuring that the data shared is kept to a minimum), fair and otherwise within the law.

The Trust will not pass governor/director information to third parties for direct marketing purposes.

Data collection requirements

Occasionally information will be shared with the Department for Education.
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

Requesting access to a governor's or director's personal data

Under data protection legislation governors/directors have the right to request access to information about them that the Trust holds. To make a request for this, please email college@franklin.ac.uk who will process the request in partnership with Franklin College Trust's Data Protection Officer.

Any governor or director also has the right to:

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- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed
- claim compensation for damages caused by a breach of the Data Protection regulations.

If any governor or director has a concern about the way the Trust is collecting or using their personal data, they should raise their concern with the Trust in the first instance, or directly to the Information Commissioner's Office at https://ico.org.uk/concerns/

Raising a Data Protection Complaint – (Collecting, Using, Storing or Sharing Personal Data)

Individuals have the right to raise a complaint about how the Trust collects, uses, stores or shares personal data. The Trust will handle all data protection complaints in accordance with the requirements of the Data (Use and Access) Act 2025 and guidance issued by the Information Commissioner's Office (ICO).

Complaints can be submitted through the Trust to any of the following ways:

- Data Protection Officer (DPO)
- Email: information.governance@franklin.ac.uk
- Postal Address: [Data Protection Officer, Franklin College Trust, Chelmsford Avenue, Grimsby, DN34 5BY]

Data Protection Complaint Handling Process

- The Trust will provide individuals with clear and accessible ways to make a data protection complaint (as identified above).
- All complaints will be acknowledged within 30 calendar days of receipt.
- The Trust will investigate complaints without undue delay and make appropriate enquiries to establish the relevant facts.
- Individuals will be kept informed of the progress of their complaint and any significant developments during the investigation.
- Where necessary, the Trust will take corrective action to address identified issues or breaches.
- The Trust will communicate the outcome of the complaint to the individual without undue delay, including details of any actions taken.
- If an individual remains dissatisfied, they will be informed of their right to raise the matter with the Information Commissioner's Office (ICO).

Contact:

If any governor or director would like to discuss, or requires clarification regarding this privacy notice, please contact:

Data Protection Officer	Craig Burkitt
Email address	college@franklin.ac.uk
Telephone number	01472 875000

Changes to this privacy notice

The Trust will continually review and update this privacy notice to reflect changes in Trust practices and, when appropriate, in response to feedback from Trust staff, students, parents and governors as well as to take into account changes in the law.