

Board Members Privacy Notice

This privacy notice explains what personal information we may hold about you as a Board Member of Northamptonshire Partnership Homes (NPH) and how we collect this information, the reasons and lawful basis for doing so, how we use the information, how long the data will be kept and the arrangements that are in place to ensure its security. The processing of personal data is governed by the Data Protection Act 2018 (DPA2018) and the UK General Data Protection Regulation (UK GDPR)

NPH is registered with the Information Commissioner's Office as a Data Controller and we are the data controller for the purposes of managing the personal data associated with your role with us as a Board Member.

What information does the organisation collect?

Personal Information is defined in the UK GDPR. It is any information which can be used to identify a living individual either directly or indirectly. It therefore includes for example, name, address, online profiles, cookie identifiers, and other identifiable information.

Special Category Data – is personal data which is considered to be sensitive and therefore requires specific protection. The categories of special category data are:

- race or ethnic origin
- political views and affiliations
- religious or philosophical beliefs
- trade union membership
- genetics
- biometrics (where used for ID purposes, for example, facial recognition)
- health

In line with the requirements of the Companies Act 2006, we record the following information about you in the Register of Directors for Northamptonshire Partnership Homes:

- Your name and any former names for business purposes
- Your business occupation
- Your contact details, which may include address, phone number and email address
- Part of the UK where you are usually resident
- Your date of birth
- Your nationality

This information is provided to relevant regulatory bodies and is available on the public record. Please note that only the service address provided is displayed on the public record, which is not necessarily your residential address.

To manage the Board Member role, we may also retain the following data about you:

- Your bank details and national insurance number
- Details of other Non-Executive positions you hold
- Details of potential or actual conflicts of interest in relation to your role.
- Additional details you may have disclosed, which could include details of your qualifications, skills, experience, identification documents and employment history
- Welcome letter which set out the terms and conditions relating to your appointment.
- Contact details for you and your next of kin
- Information about your remuneration
- Information about your criminal record
- Assessments of your performance, including appraisals, performance reviews, one to ones, training you have participated in, performance improvement plans and related correspondence
- Information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments, details of any absence management plans put in place or adjustments made
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief

Legal basis for processing the information

The following outlines the categories of your personal data we process and the lawful basis for doing so:

Name	Legal Obligation
Address	Legal Obligation
Telephone number	Legal Obligation
E-mail Address	Legal Obligation
NI Number	Legal Obligation

Date of birth	Legal Obligation
Previous name	Legal Obligation
Previous Address (if moved within the last three years?)	Legal Obligation
Copy of photographic identification	Legal Obligation
Relevant financial information such as bank details	Legal Obligation
Qualifications and employment history	Legal Obligation
Training and appraisal records	Legal Obligation
Religion or other Philosophical Belief	Explicit Consent
Sexual Orientation	Explicit Consent
Ethnic Group	Explicit Consent
Disabilities	Explicit Consent

Why we collect and use this information

NPH will collect and use this personal information to comply with governance requirements and to provide support services to facilitate Board members in carrying out the roles and responsibilities set out in the Board Code of Conduct and the Terms of Reference.

How the information is collected

We collect this information in a variety of ways, such as from information supplied by you in application forms, CVs or resumes; obtained from identity documents such as your driving licence; from correspondence with you; or through interviews, meetings or other assessments.

In some cases, it may be necessary to collect personal data about you, with your approval, from third parties, such as references supplied and information from criminal records checks permitted by law.

Who has access to your data?

The information you provide to us will be treated as confidential.

Your information may be shared internally, including with the Chair, other Board Members (contact details only), Executive Directors, the Governance and Corporate Support Team, Finance Team, Human Resources Team and IT/Digital staff if access to the data is necessary for performance of their roles. Where required NPH's Data Protection Officer may also have access to your data, e.g. for processing subject access request or investigation of any potential data breaches.

We may need to share your data with third parties to obtain references from referees and obtain necessary criminal records checks from the Disclosure and Barring Service.

The organisation may also share your data with third parties in the context of complying with regulation and/or legislation and/or contract agreements. In those circumstances the data will be subject to confidentiality arrangements.

The organisation also shares your data with third parties that process data on its behalf, in connection with payroll, expenses claims, insurance providers, external benchmarking through individual survey, training providers and provision of individual or professional subscriptions.

The organisation will not transfer your data to countries outside the European Economic Area.

How does the organisation protect data?

We take the security of your data seriously. Internal policies and controls are in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. We already have in

place, under the current law, various safeguards, including password protecting all data accessed in any electronic form, and holding all data on secure servers which are either located on-site, or securely held within Microsoft's cloud servers. We also undergo regular audits in this area, to help us keep improving how we manage data, and to learn from best practice developed and used by other organisations.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For how long does the organisation keep data?

In line with Companies Act 2006 requirements, we will hold personal data required for the Register of Directors indefinitely and the documents both provided and signed when you became a Board member for 12 years following the end of your term of service. All other data will be removed from our records within 12 months of the end of your term of service.

Your rights

- **Right of access.** The GDPR gives you the right to access copies of the personal data held about you. Your right of access can be exercised in accordance with the GDPR.
- **Right to request an electronic copy of your personal data.** Where you provide personal data you have the right to be provided with a structured, commonly used and machine-readable copy and have the right, in certain circumstances, to ensure that we transmit that personal data to a recipient of your choice without hindrance (the right to data portability).
- **Right to correct.** You have the right to ensure that we correct the records of any personal data held about you which are inaccurate. You also have the right to ensure that we complete any incomplete personal data held about you.
- **Right to erasure.** You have the right to ensure that we erase your personal data, though we would need to retain limited details to comply with the Companies Act 2006, (the right to be forgotten).
- **Right to restriction.** In certain circumstances, such as where you have contested the accuracy of personal data, you have the right to restrict our processing of your personal data. That means that we will hold your personal data on file but that we cannot process that personal data. We will inform you if for any reason the restriction on processing your personal data is lifted.

Where any rectification or erasure of personal data or restriction of processing has taken place, we shall communicate any rectification to you or erasure or restriction of processing to each recipient to whom the personal data has been disclosed, unless this proves impossible

or involves disproportionate effort. We shall, if you request, inform you about those recipients.

Exercising your rights. If you wish to exercise any of your rights, or if at any point you believe the personal data, we process is incorrect, you can request to see this personal data. If you would like a copy of the personal data about you that we process, or if you wish to have that personal data transferred to another company or organisation, please contact our Data Protection Team Leader dataprotectionNPH@nph.org.uk

If you have any concerns about our use of your personal information, you can lodge a complaint on dataprotectionNPH@nph.org.uk.

You can also complain to the ICO if you are not satisfied with the way NPH has processed your personal data. The ICO's contact details are:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number 0303 123 1113
Or by using <https://ico.org.uk/concerns/>

If you have any queries relating to anything in the letter, please feel free to contact us at governance.nph@nph.org.uk.