



Privacy notice for Trustees and Governors

Under data protection law, individuals have a right to be informed about how the Trust or school uses any personal data that we hold about them. This privacy notice explains how we collect, store and use personal data about individuals who serve as Trustees and / or Governors.

We, Trinitas Academy Trust, are the “data controller” for the purposes of data protection law.

Our data protection officer is Sam Luker (see “Contact us” below).

The personal data we hold

We process data relating to Trustees and Governors at our Trust and its schools. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Name
- Contact details
- Date of birth
- Trustee / Governor type (e.g. appointed / parent etc) and term of office
- Photographs (e.g. for website / ID badge)
- DBS information
- Information given on your Declaration of Interests form
- CCTV footage
- Data about your access to online training
- Skills and experience

Why we use this data

The personal data collected is essential, in order for the Trust and its schools to fulfil their official functions and meet legal requirements.

We collect and use Trustees’ and Governors’ information, for the following purposes:

- To meet the statutory duties placed upon us
- To fulfil our safeguarding obligations
- To enable us to provide effective governance (including by maintaining a governor database, and by contacting you with regard to new guidance etc)
- To provide the required data to the DfE database (“Get Information about Schools” (GIAS)), and other bodies such as the LA and the Diocese.

Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to.

We use it when we need to carry out a task in the public interest and to comply with a legal obligation.

All academy trusts, under the Academies Financial Handbook, have a legal duty to provide the governance information (to GIAS) as detailed above.

Collecting this information

We collect personal information via email, governor contact forms, Declaration of Interest forms, and other specific methods (e.g. Skills Audit). Governor data is essential for the Trust's and schools' operational use. Whilst the majority of personal information you provide to us is mandatory, some of it may be requested on a voluntary basis. In order to comply with GDPR, we will inform you at the point of collection whether you are required to provide certain information to us or if you have a choice in this.

How we store this data

Personal data is stored in line with our Records Management Policy.

Data sharing

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

Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with:

- Our local authority
- The Department for Education
- Our regulator, Ofsted
- The Diocese of Rochester
- The Disclosure and Barring Service
- The National Governance Association
- Our insurance provider

DfE: The DfE collects personal data from educational settings and local authorities. We are required to share information about our Trustees and Governors with the DfE under the requirements set out in the Academies Financial Handbook. All data is entered manually on the GIAS system and held by DfE under a combination of software and hardware controls which meet the current government security policy framework. (See also Appendix 1).

Transferring data internationally

We will not transfer your data internationally.

Your rights

How to access personal information we hold about you

Individuals have a right to make a "subject access request" to gain access to personal information that the Trust or school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- 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
- Let you know whether any automated decision making is being applied to this data, and any consequences of this
- 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 our Data Protection Officer (see “Contact us” below).

Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to 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, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our Data Protection Officer (see “Contact us” below).

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.

To make a complaint, please contact our Data Protection Officer.

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

- 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

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer, Trinitas Academy Trust. Email: dpo@trinitasacademytrust.org

Appendix 1

How Government uses your data

The Trustee / Governor data that we lawfully share with the DfE via GIAS:

- Will increase the transparency of governance arrangements;
- Will enable schools and the department to identify more quickly and accurately individuals who are involved in governance and who govern in more than one context;
- Allows the department to be able to uniquely identify an individual and in a small number of cases conduct checks to confirm their suitability for this important and influential role.

Data collection requirements

To find out more about the requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/government/news/national-database-of-governors>

Note: Some of these personal data items are not publically available and are encrypted within the GIAS system. Access is restricted to a small number of DfE staff who need to see it in order to fulfil their official duties. The information is for internal purposes only and not shared beyond the department, unless the law allows it.

How to find out what personal information DfE hold about you

Under the terms of the Data Protection Act 2018, you're entitled to ask the Department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

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