

Privacy Notice

School Trustees

Based on the DfE model privacy notice (August 2024)



November 2024

Privacy Notice (How we use school trustee information on Get Information about Schools (GIAS))

The categories of Trustee information that we process include:

- personal identifiers, contacts and characteristics (such as name, date of birth, contact details and address)
- governance details (such as role, start and end dates and Trustee ID)
- information about business and pecuniary interests
- photographs and CCTV images captured in school

Why we collect and use Trustee information

The personal data collected is essential, in order for the school to fulfil their official functions and meet legal requirements. We collect and use Trustee information, for the following purposes:

- a) To meet the statutory duties placed upon us
- b) Enable the development of a comprehensive picture of governance and how it is deployed
- c) To enable appropriate checks to be completed
- d) Enable individuals to be kept informed of governance training, book training and relevant information
- e) To inform relevant authorities/organisations of a member/trustee/clerk appointment
- f) To undertake our responsibilities for safeguarding children
- g) To communicate with you
- h) To comply with the law regarding data sharing

Our Legal Obligations

We must make sure that information we collect and use about Trustees is in line with the UK General Data Protection Regulation (GDPR) 2018. This means that we must have a lawful reason to collect the data, and that if we share that with another organisation or individual, we must have a legal basis to do so.

The lawful basis for schools to collect information comes from a variety of sources, such as:

- Article 6 and Article 9 of the GDPR
- under the Academies Financial Handbook academy trusts have a legal duty to provide governance information
- under the Companies Act 2006 academy trusts have a legal duty to provide information on members and directors to Companies House

Collecting Trustee information

We collect personal information via Trustee contact forms.

Trustee data is essential for the school's 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.

Storing Trustee information

We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please visit the school website and our GDPR policies.

Who we share Trustee information with

We routinely share this information with:

- our local authority (where applicable)
- the Department for Education (DfE)
- other Trustees on the same governing board
- Disclosure & Barring Service
- the clerk to the board
- Trustee Services
- Companies House

Why we share Trustee information

We do not share information about our Trustees with anyone without consent unless the law and our policies allow us to do so.

Department for Education

The Department for Education (DfE) collects personal data from educational settings and local authorities. We are required to share information about our Trustees with the Department for Education (DfE), under:

We are required to share information about our Trustees 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](#).

For more information, please see 'How Government uses your data' section.

The Clerk to the Board

In case of emergency or an Ofsted inspection it is necessary for the school office to hold details of any individuals involved in the governance of the school. The school Single Central Record will record that appropriate checks have been carried out for everyone involved in the governance of the school.

Other members/trustees on the same Trust Board (or in the same MAT)

For ease of communication and with your consent contact details may be shared with other Trustees on the board.

Disclosure and Barring Service

All maintained school Trustees are required to have an enhanced criminal records certificate from the DBS. Further details on DBS checks and Section 128 checks in schools are within the statutory guidance Keeping Children Safe in Education (KCSIE).

Companies House

Academy trusts are required to tell Companies House within 14 days about changes to the Board including new appointments, resignations and change of details.

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the School Office.

Your rights include:

- the right to be informed about the collection and use of your personal data – this is called ‘right to be informed’.
- the right to ask us for copies of personal information we have about you – this is called ‘right of access’, this is also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called ‘right to rectification’.
- the right to ask us to delete your personal information – this is called ‘right to erasure’.
- the right to ask us to stop using your information – this is called ‘right to restriction of processing’.
- the ‘right to object to processing’ of your information, in certain circumstances.
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to [complain to the Information Commissioner](#) if you feel we have not used your information in the right way.

There are legitimate reasons why your information rights request may be refused. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.

- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns/>.

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the School Office.

Last updated

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated in August 2024.

Contact

If you would like to discuss anything in this privacy notice, please contact the School Office in the first instance.

How Government uses your data

The Trustee 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-trustees>

Note: Some of these personal data items are not publicly available and are encrypted within the GIAS system. Access is restricted to a small number of DfE staff and education establishment users with a Department for Education (DfE) signing in account 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 for Education (DfE):

- 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' (SAR). 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-informationcharter>

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

Data Protection Officer

Our Data Protection Officer is SBM Services (UK) Limited, contact details 01206 671103 or e-mail info@sbmservices.co.uk