



Privacy Notice – Governors & Trustees

Policy Code:	Gov2
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1. Introduction

Schools and educational trusts are the data controllers for Trustee and Governor information and have a duty to inform existing and potential Trustees and Governors how they process the data that is in their control.

- 1.1 This Privacy Notice explains how we collect, store and use personal data about individuals working with the Trust/Academy in a voluntary capacity, including Governors/Trustees.

2. The categories of personal data

- 2.1 We process data relating to those who we employ, or otherwise engage, to work or volunteer at our Academies and Head Office.

- 2.2 Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not limited to:

- Personal information, including name, contact details, date of birth, email address and other personally identifiable data that may include photographs of you or CCTV images.
- Characteristics, such as race, ethnicity, nationality and sexual orientation, disability and access requirements.
- Financial information.
- Identity verification records, meeting attendance records, records of communications, records of visits to Academies.
- Other, including a copy of your driving licence or passport, professional details, relevant business and pecuniary interest details, role application details, references.
- Governance information – e.g. role, start date, end date.

3. Why CIT collects and uses this data

- 3.1 The purpose of processing this data is to help the Trust and its Academies to:

- Establish and maintain effective governance (this includes to consider the suitability for the role of a Governor/Trustee generally and in relation to the needs of the Trust/Academy).
- Make Governor/Trustee appointments and removals.
- Monitor Governor/Trustee skills and address gaps.
- Meet statutory obligations for publishing and sharing Governor/Trustee details.
- Facilitate safer recruitment as part of our safeguarding obligations towards pupils.
- Comply with the statutory duties placed on us in respect of governance.
- Undertake equalities monitoring.
- Ensure that appropriate access and other arrangements can be made for those who need them.
- To meet the statutory duties placed upon the Trust.

4. Our lawful basis for using this data

- 4.1 We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Meet legal requirements imposed upon us such as our statutory duties in respect of governance and such as our duty to safeguard pupils.
- For the purpose of meeting the statutory duties placed upon the Trust in accordance with the lawful basis of legal obligation, establish and maintain effective governance across the Academy Trust and academies/schools.
- Academy Trusts, under the ‘Academy Trust Handbook’ (<https://www.gov.uk/guidance/academy-trust-handbook>) have a legal duty to provide the governance information as detailed above.

4.2 We may also use personal information about you where:

- You have given us consent to use it in a certain way. Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so.
- Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the Trust’s use of your data.

5. How do we collect your information?

5.1 We collect this information from information you send directly to us.

This is usually through:

- Trustee and Governor application forms
- DBS form
- Record of business interest form

Governance roles’ data is essential for the Trust’s operational use. Whilst the majority of information you provide to us is mandatory, some of it is requested on a voluntary basis. To comply with the UK 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.

6. How CIT stores the data

6.1 The data collected will be stored on the Trust’s network. We control access to systems and networks, allowing us to stop people who are not allowed to view your personal information from getting access to it.

6.2 Your personal data will be kept in accordance with timelines specified in the Trust’s Records Management Policy.

7. Data sharing

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

7.2 We may share personal information about you with trusted external service providers (third parties) for the purpose of:

- Providing services such as references, qualification checks, criminal reference checking services (Enhanced DBS as required), verification of the details you have provided from third party sources.
- Government departments or agencies – to meet our legal obligations to share

information about Governors/Trustees.

- Those Local Authorities we operate in – to meet our legal obligations to share certain information with them, such as details of Governors/Trustees.
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as Governor/Trustee support.
- Professional advisers and consultants.
- Employment and Governor/Trustee recruitment agencies.
- Police forces, courts.

7.3 **Why do we share your information?**

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

7.4 **Local Authority data sharing**

We may be required to share your information with the Local Authority (LA).

7.5 **DfE data sharing**

The DfE collects personal data from schools, Trusts and LAs. We are required to share information about individuals in governance roles with the DfE under:

- Requirements set out in the [‘Academy Trust Handbook’](#).
- Any information we share with other parties is transferred securely and held by the other organisation in line with their data security policies. All governance data required by the DfE is entered manually on the GIAS system and held by the DfE under a combination of software and hardware controls which meet the current government security policy framework, which is available by following this link: <https://www.gov.uk/government/publications/security-policy-framework>

7.6 **How does the government use your data?**

The governance data that we lawfully share with the DfE via GIAS will:

- Increase the transparency of governance arrangements.
- Enable the Trust and the DfE to quickly and accurately identify individuals who are involved in governance and who govern in more than one context.
- Allow the DfE 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.

You can find out more about the requirements placed on the Trust by the DfE, including the data we share with them, via this website:

<https://www.gov.uk/government/news/national-database-of-governors>.

Note: Some of this personal data is not publicly available and is encrypted within the GIAS system. Access is restricted to authorised DfE and education establishment users with a DfE sign-in account who need to see it to fulfil their official duties. The information is for internal purposes only and is not shared beyond the DfE unless the law allows it to be.

Under the Data Protection Act 2018 you are entitled to ask the DfE what personal information it holds about you. You have the right to ask the DfE:

- If it processes your personal data.
- For a description of the data it holds about you.
- The reasons it is holding your data and any recipient it may be disclosed to.
- For a copy of your personal data and any details of its source.

To exercise these rights, you should make a subject access request. Information on how to do this can be found by following this link:

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

You can also contact the DfE directly using its online contact form by following this link: <https://www.gov.uk/contact-dfe>.

7.7 We will never rent or sell your data to any third party for their own marketing purposes, and we will only disclose your data to another third party without your express consent when we are legally required to do so.

7.8 We may also release personal information to regulatory or law enforcement agencies, if they require us to do so.

8. Transferring data internationally

8.1 Where we transfer personal data to a country or territory, we will do so in accordance with Data Protection law.

9. Your rights

9.1 You have specific rights to the processing of your data; these are the right to:

- Request access to the information the Trust or school holds about you.
- Restrict the processing of your personal information, e.g. consenting to it being stored, but restricting it being processed any further.
- Object to and prevent processing for the purpose of direct marketing and processing for the purpose of scientific or historical research and statistics.
- Object to decisions being taken by automated means.
- Have inaccurate or incomplete personal data rectified, blocked, erased or destroyed.
- Not be subjected to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.

10. Complaints

10.1 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 the DPO in the first instance.

10.2 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.

11. Contact Details

11.1 If you have any questions, concerns or would like more information about anything mentioned in this Privacy Notice, please contact our DPO - details below:

Sarah Fardell, Data Protection Officer, Community Inclusive Trust
Telephone: 03300 585520
E-mail: DPO@citacademies.co.uk

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