

Privacy Notice - How we use Trustee and Governor information

The categories of Trustee and Governor information that we process

We process data relating to those we recruit as Trustee and Governors to work within Aldridge Education. The purpose of processing data is to assist in the running of the Trust and its academies and adult learning.

The categories of Trustee and Governor information that we collect, process and hold include:

- personal information such as name, title, contact details and DBS information
- recruitment information such as CVs and references
- special categories of data including characteristics information such as gender, age and ethnic group
- information about business and pecuniary interests
- attendance at committee meetings
- images/photographs for access cards, biographies published on our websites etc
- Live streaming platforms or recorded meetings (you will be advised if lessons or meetings are recorded)

This list is not intended to be exhaustive.

Why we collect and use Trustee and Governor information

We use school Trustee and Governor data to:

- fulfil our statutory obligations as a school/Trust such as keeping Get Information About schools and Companies House registrations up-to-date
- enable the development of a comprehensive picture of our governance structure and composition and how Trustees and Governors are deployed
- To deal with and comply with election / re-election of Trustees and Governors or termination of



appointments

- facilitate safer recruitment as part of our safeguarding responsibilities
- operate and keep a record of attendance at meetings for reporting purposes including disclosure on our websites and in annual accounts
- inform the development of recruitment and retention policies
- improve the effectiveness of our Trustees and Governors through undertaking skills audits to offer effective support and training
- provide access to relevant School and Trust facilities
- to create IT accounts for Trustees and Local Governor Chairs
- to be able to respond to and defend legal claims

This list is not intended to be exhaustive.

The lawful basis on which we process this information

Data Protection law requires us to have a lawful reason ('lawful basis') for processing the personal data we use. We collect and use Trustee and Governor information under Article 6, and Article 9 where data processed is special category data from the General Data Protection Regulations May 2018 (GDPR) and for data collection purposes under the Education Act 1996. Our lawful basis for processing will be explained at the point at which we collect personal information unless there is a lawful reason not to do so.

The Trust and our Schools and Adult Learning provision process a wide range of personal data for a variety of purposes. The lawful basis we rely on will therefore vary. However, generally, the lawful basis we mainly use in relation to our Trustee and Governors are:

- We need to comply with the law (we have a legal obligation): for example, we collect and use workforce information under legal and statutory obligations within the Keeping Children Safe in Education (KCSIE) statutory guidelines. We are required to check suitability to work with Schools/Trust, entitlement to work in the UK and to comply with health and safety laws.
- We need to carry out a task in the public interest: for example, where the collection and use of Trustee and Governor information is necessary for us to perform our role as a school and Trust to deliver our public task of providing education to our pupils.
- You have given us consent to use it in a certain way (for example a photo of you for promotional purposes or on our website).



- It is in ours or a third party's, legitimate business interests to process the data. Where this is the case, we will ensure that we have considered whether our legitimate interests are overridden by your rights and freedoms as a Trustee or Governor.

We may also collect, store, and use information about you that falls into “special categories” of more sensitive personal data which has extra protection in law and requires us to identify a condition for processing under Article 9 of the GDPR. Where we process more sensitive data, we need an additional legal basis. The basis we mainly use are:

- Legal obligation
- Substantial public interest including:
 - Statutory and government purposes
 - Equality of opportunity or treatment
 - Preventing and detecting unlawful acts
 - Preventing fraud
 - Public Health
- Explicit consent

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. We will then cease this aspect of processing.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data. There are also other lawful bases that may apply, and this will be made clear wherever possible.

Collecting Trustee or Governor information

We collect personal information to enable us to manage our Trustees and Governors and to help us to operate our Schools, Adult Learning and overall Trust. Trustee and Governor data is essential for the schools / Trust to operate.

We collect and use information about you in a variety of ways including through the recruitment process, information obtained through identity documents, from correspondence with you or through interviews, meetings or other assessments while you are working with us.

Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with 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 in this.



Storing Trustee or Governor information

Personal data is stored in line with our data protection policy in a range of different places including in your Trustee or Governor files and in IT systems including the school's/Trust email system. We create and maintain a Trustee or Governor file for each Trustee or Governor. The information contained in this file is kept secure and is only used for purposes relevant to your Trustee/Governor position. Once your term with us has ended, we will retain this file and usually delete the information in line with our retention policies (unless exceptionally there is a business need to retain it, for example in relation to safeguarding) for 6 years after the termination of your term of office.

Who we share Trustee or Governor information with

Information about our Trustee or Governors will not be shared with any third party without your consent, unless the law permits this. Where it is legally required or is otherwise necessary (and it complies with data protection law) personal information may be shared with:

- The Disclosure and Barring Service
- Educators, examining bodies and our regulator (Ofsted)
- Our auditors and legal advisors
- Department for Education (DfE)
- Professional Governance Bodies or Associations

Why we share school Trustee or Governor information

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

Where we transfer personal data to a country or territory outside of the UK and European Economic Area, we will do so in accordance with data protection law and ensure that we have sufficient safeguards in place.

Department for Education

The Department for Education (DfE) collects data on a statutory basis through Get Information About Schools.

Companies House

In accordance with Section 167 & 167D of the Companies Act 2006 anyone on the Trust Board must be registered with Companies House as a Director of the Company.



National Governance Association (NGA)

In order to access the NGA website and receive weekly email updates it is necessary for the NGA to have email names and email addresses.

Governor Hub

Sharing of governance information (minutes, agendas, supporting papers for meetings) is managed through Governor Hub ensuring that it is not necessary for individuals to hold these papers on personal electronic devices.

Academy and Trust

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. For ease of communication and if appropriate, contact details may be shared with other members/trustees/governors on the same board or committee.

Requesting access to your personal data

Under data protection legislation, individuals have the right to request access to information that we hold. This is known as making a 'Subject Access Request' (SAR). If you make a subject access request, and if we 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 the data, and any consequences of this
- Give you a copy of the information in an intelligible form within a month, unless an extension is necessary on the ground of the complexity of the request.

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

To make a request for your personal information, contact:

- School Data Protection Leads (DPLs):
Darwen Aldridge Community Academy dpl@daca.uk.com
Darwen Vale High School dpl@darwenvale.com
Darwen Aldridge Enterprise School dpl@daestudio.biz
Sudell Primary School dpl@sudell.blackburn.sch.uk



Aldridge UTC@MediaCityUK
Dukes Aldridge Academy
Brighton Aldridge Community Academy
Portslade Aldridge Community Academy
Aldridge Adult Learning

dpl@utcmedicityuk.org.uk
dpl@dukesacademy.org.uk
dpl@baca-uk.co.uk
dpl@paca.uk.com
dpl@aal.org.uk

- Trust Data Protection Officer (DPO): dpo@aldridgeeducation.org

You also have the right to:

- to ask us for access to information about you that we hold
- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

For further information on how to request access to personal information held centrally by 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:

- School Data Protection Leads (DPLs):
Darwen Aldridge Community Academy dpl@daca.uk.com
Darwen Vale High School dpl@darwenvale.com
Darwen Aldridge Enterprise School dpl@daestudio.biz



Sudell Primary School
Aldridge UTC@MediaCityUK
Dukes Aldridge Academy
Brighton Aldridge Community Academy
Portslade Aldridge Community Academy
Aldridge Adult Learning

dpl@sudell.blackburn.sch.uk
dpl@utcmedicityuk.org.uk
dpl@dukesacademy.org.uk
dpl@baca-uk.co.uk
dpl@paca.uk.com
dpl@aal.org.uk

- Trust Data Protection Officer (DPO): dpo@aldridgeeducation.org

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 on January 2022.

Contact

If you would like to discuss anything in this privacy notice, please contact:

Trust Data Protection Officer (DPO)



How government uses your data

The workforce data that we lawfully share with the DfE through data collections:

- informs departmental policy on pay and the monitoring of the effectiveness and diversity of the school workforce
- links to school funding and expenditure
- supports 'longer term' research and monitoring of educational policy

Data collection requirements

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Sharing by the Department for Education

The Department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested; and
- the arrangements in place to securely store and handle the data



To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

How to find out what personal information the DfE hold about you

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

- 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 the department:

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