Privacy Notice for Alexandra Academy Trust Members/Trustees/ Governors and other volunteers - GDPR compliant

Introduction

Members, Trustees and Governors supporting the Alexandra Academy Trust have many legal rights about how their personal data is obtained, stored, processed and transmitted (i.e. 'processed') both during your period on the governing board and after. The Trust has to obtain certain information before a candidate for the governing body may stand for election; further information has to be passed on to the DfE). This privacy notice details how the Trust will comply with the law and gives you an understanding of why and how the academy uses the information about you. This privacy notice is not a form of contract.

The Trustees, Governors and Leadership of the Alexandra Academy Trust acknowledge the absolute necessity for correct and lawful treatment of data and are committed to ensuring security for individual governor's data.

Roles and Responsibilities

The Trust is a **Data Controller** as we are responsible for decisions about how and why we use your personal information (for example collecting contact information to organise meetings effectively).

At times the Trust acts as a **Data Processor** when we are required to obtain, process and transfer data on the behalf of external organisations (certain details about Trustees and Governors have to be passed on to the DfE, for example).

The Trust has appointed a **Data Protection Officer**

Ben Cain/Kirsty Robson
SAM People in Association with Imperio
First Floor, Unit A, Cedar Court Office Park,
Denby Dale Road,
Wakefield, WF4 3FU dpo@feps.co.uk
01924 907319/07947 918330

Usually, the Trust will coordinate data protection practice through **Lyndsey Tasker (Trust Business Manager)**
The DPO may be contacted directly should any Trustees or Governors feel that their concerns about data protection are not being addressed within the Trust or the rest of the governing body. Amongst the DPO's duties are:

- Advice on the secure storage and transmission of data (both physical and digital)
- Updates for the Trust on GDPR
- The completion of a data audit
- Support for a data processing record system

- The provision of template GDPR documentation (please note that this cannot be shared beyond the Trust without the permission of Impero Solutions Ltd)
- Reporting to the Trust's leadership and governing body on levels of security and compliance
- Support with securing from third parties who might hold personal data through the academy certification that they are also complying fully with GDPR duties
- The DPO will communicate with the Information Commissioner's Office should there be a confirmed or suspected data breach
- The DPO will communicate with any person whose data might have been improperly accessed, lost or stolen

The Trustee who oversees data security for the Board of Trustees is
Alan Guildford – Email: chair@alexandraacademytrust.co.uk

The principles under which the Trust will process data

- Data will be kept securely - all Trustees/Governors share this duty
- Personal information will all be stored no longer than is necessary to exercise the Trust's duties and statutory requirements
- All Trustees and Governors will be informed clearly about the purposes for processing data
- Data processing will be limited to the purposes that are explained to Trustees and Governors
- The Trust will keep data relevant, current and up-to-date
- The Trust will only use personal information in a legal and transparent manner

The categories of information and the basis for which that information is processed

In broad terms the Trust will collect, store, process and transmit data to meet its duties under

- Safer recruitment (which Trustees/Governors have access to the relevant training)
- Trustee/Governor welfare (should it be thought wise to keep next-of-kin details)
- Attendance details (meetings)
- To meet the Trust's responsibilities under the Equalities Act and to meet the national guidance on the recruitment of Trustees and Governors

Specifically the Trust will process the following information

Data processed on the legal basis of public task for safe recruitment
Trustees and Governors may lead recruitment following successful training in safer recruitment

Data processed on the legal basis of public task
Your fitness to acquire the role of Trustee or Governor (the declaration Trustees/Governors sign when standing for office), the category within which you will serve as a governor (such as a parent governor) and the names of nominees.

Data processed on the legal basis of public task for Trustee/Governor welfare
Contact details for your next of kin, any medical needs, disability, allergies and any other health needs that you choose to share

Data processed on the legal basis of public task to fulfil the Trust's duty of accountability
The roles that you agree to take on within the board of Trustees/Governors. The numbers of meetings attended and the training that you acquire in your role as Trustee/Governor.

Data processed on the legal basis of consent for equality monitoring
The DfE requires data on the background of Trustees/Governors to be registered by the Headteacher or their representative. This data may include ethnicity, country of birth and gender.

This cannot be an exhaustive list, but the Trust will inform members of the relevant Governing Body of any significant extra data processing that involved governors' personal information.

Following DfE advice this Trust requires that all Trustees/Governors have their background checked with the **Disclosure and Barring Service** as they have a role of responsibility for vulnerable children.

If significant information is withheld then a candidate for the role of Trustee/Governor might not be able to stand for appointment/election.

Certain categories of personal information are seen as particularly sensitive:

- Data concerning health, including mental health
- Data concerning children
- Data relating to religion
- Data relating to sexuality
- Data relating to ethnicity
- Data relating to performance management

Should the Trust process any Trustee/Governor's data from the above categories, then particular care will be taken and the data will be kept securely. Likewise, the Trustees/Governors share a duty of care with such data and must treat data within these categories with enhanced confidentiality.

The Trust does not use automated decision-making processes based on Trustee/Governors' data.
The Trust does require all third parties who have access to or also process Trust data, to confirm that they also meet the standards expected by the GDPR.

Under law, in almost all circumstances, you have the right to request access to your personal information held by the Trust. Usually this is called a subject access

request. Under this right you may request a copy of the information held by the Trust, to check the data and to check that the processing is lawful.

Please note that subject access requests cannot attract a fee, but that they do necessitate significant time and human resources. Should the Trust consider responding to all aspects of a subject access request may be against the welfare interests of a child, then parts of an SAR may be withheld. In the very rare instance that this is the case, you would be informed in writing.

Should the Trust wish to hold data in addition to that which is required to maintain the welfare of the pupils, staff and the efficient management of the governing body, then this additional data may be processed on the legal basis of consent. Your consent would be sought, thereafter you would have the right to withdraw consent.

As well as seeking advice and taking complaints to the Trust's Data Protection Officer (see contact details above) individual Trustees/Governors may make a complaint to the Information Commissioner's Office (ICO) which is the UK supervisory authority for data protection.

The Alexandra Academy Trust may update this privacy notice at any time. A copy of the new notice will be given to you. We may inform you in other ways of any changes that we may make to the processing of your data.

I_____ (please print your name) acknowledge that I have read and received a copy of Alexandra Academy Trust Members, Trustees and Governors privacy notice.

Signed_____Dated _____