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When you join our Trust, we ask you to provide us with some personal information which is held on our central computer system, to enable us to contact you and also to address any specific needs in a manner that you would reasonably expect us to. There may also be times when we are required to share some of this information to protect the safety of children and to fulfil legal obligations that we have as a Trust.

Who is responsible for this information?

EQUA Mead Learning Trust is the Data Controller for the use of personal data in this privacy notice.

The categories of pupil information that we process include:

- Personal identifiers: such as name, address, contact details both for home and workplace, including email
- Governance Details: such as role, start and end dates and governor ID
- Attendance: such as sessions attended, number of absences
- DBS: information to support your application for DBS clearance
- Recruitment documentation: including CVs, application forms, and employment records
- Photograph: for identification purposes, and for placing on our website.
- Safeguarding information: Such as allegations of a CP nature, including where the allegation is unfounded
- Business Interest: any relevant information to avoid conflict of interests

This list is not exhaustive. A data asset register is maintained, and this can be accessed upon request.

Purpose - why we collect and use this information

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

a) To enable us to contact you both as part of our normal procedures and in the event of any emergency (Legal basis: Consent & Vital Interest)
b) To enable email contact with you both for the distribution of information from the school, and any communication specific to your governance role within the school (Legal basis: Consent)
c) To fulfil our obligations under safeguarding legislation (Legal basis: Legal Obligation)
d) To fulfil our obligations to provide information to statutory authorities including Companies House, Government bodies and agencies – Department for Education, Education and Skills Funding Agency, OFSTED, and the Charities Commission (Legal basis: Consent, Legal Obligation & Legitimate Interest)

The lawful basis on which we use this information

Under the General Data Protection Regulation (GDPR), the lawful basis we can rely on for processing governance information is:

- Consent: the individual has given clear consent to process their personal data for a specific purpose
- Contract: the processing is necessary for a contract we have with an individual, or because we have been asked to take specific steps before entering into a contract
- Legal Obligation: the processing is necessary in order to comply with the law (not including contractual obligations)
- Vital Interests: the processing is necessary to protect someone's life
- Public Task: the processing is necessary in order to perform a task in the public interest and official functions, and the task or function has a clear basis in law
- Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests

We collect and use 'special categories of personal data' under the following 'lawful basis' as defined within the GDPRs:

- Article 9(2)(a): where you have understood the reason for us requesting the data and have given your consent to us doing so for the purpose specified
- Article 9(2)(b): where processing is necessary for the purposes of carrying out the obligations in the area of social protection law
- Article 9(2)(c): that processing is necessary to protect the vital interests of your child or of another person where you or your child are physically or legally unable to give consent
- Article 9(2)(d): that processing is carried out in the course of our legitimate activities, with appropriate safeguards

Under the General Data Protection Regulations (GDPR), the lawful basis we rely on for processing governance information is for the purposes of

a) As identified above, in accordance with the legal basis of Consent and Vital Interest: collecting the data is necessary to process data for a specific purpose. Vital Interest: to keep people safe
b) As identified above, in accordance with the legal basis of Consent: to process data for a specific purpose, and to perform the role of governor
c) As identified above, in accordance with the legal basis of Legal Obligation: to ensure compliance with the law and Safeguarding requirements
d) As identified above, in accordance with the legal basis of Consent, Legal Obligation and Legitimate interest: to comply with legal registration processes and be able to perform the duties as required by the DfE

All maintained school governing bodies, under section 538 of the Education Act 1996 and academy trusts, under the Academies Financial Handbook, have a legal duty to provide the governance information as detailed above.

Collecting governance information

We collect governance information via for example, recruitment forms / processes. Governance data is essential for the school's operational use. 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 the general data protection legislation, we will inform you at the point of collection, whether you are required to provide certain personal information to us or if you have a choice in this.

Storing governance data

We hold governance data securely for the set amount of time shown in our data retention schedule. Information regarding our data retention schedule and how we keep your data safe can be supplied upon request.

We store your information both in the original paper copy on which it was requested, on our website, and in our electronic record systems which are security protected. Access to that data is limited strictly to those who need to obtain the information and we take responsibilities regarding security very seriously. We share this information on a 'need to know' basis to facilitate contact with you, and to provide information to statutory authorities (ie. government departments / agencies).

The school 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.

Who we share governance information with

- We routinely share Governance information with:
- The Department of Education
- Within the Multi-Academy Trust
- Companies House

Why we share governance information

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

We share governance data with the Department for Education (DfE) on a statutory basis.

We share information about our governors within the wider Trust to facilitate full governance functioning.

We share information about our governors with Companies House to comply with the Charities Act and the requirements to register relevant individuals.

Department for Education

The Department for Education collects personal data from educational settings and local authorities. We are required to share information about individuals in governance roles with

the Department for Education (DfE) under the requirements set out in the Academies Financial Handbook.

All data 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.

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

Requesting access to your personal data

Under GDPR, 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 Business Manager / Data Protection Officer.

You also have the right to:

- Ask us for access to information about you that we hold
- Have your personal data rectified, if it is inaccurate or incomplete
- Request the deletion or removal of personal data where there is no compelling reason for its continued processing
- Restrict our processing of your personal data (ie permitting its storage but no further processing)
- 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, you should 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 the School Business Manager.

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 April 2024.

Contact

If you would like to discuss anything in this privacy notice, please contact the School Business Manager at your school.