

# Privacy Notice for Members, Trustees, Governors and Volunteers

## **Privacy notice – how the school uses members’, trustees’, governors’ and volunteers’ information**

This privacy notice explains how Keystone Academy Trust (the trust) collects, uses and shares personal information about people who hold governance roles (members, trustees and governors) and about volunteers who support the trust or its academies.

For the purposes of this notice, “volunteers” includes anyone who carries out a role for the trust or one of its academies on an unpaid basis (other than reimbursement of reasonable expenses). This includes, for example, parent/carer volunteers, classroom or reading volunteers, trip/club helpers, fundraising volunteers, and young volunteers (including sixth-form students and other under-18s undertaking volunteering or work-experience style placements).

### **Who we are (Data Controller)**

Keystone Academy Trust is the data controller for the personal data processed during recruitment. The Chief Executive Officer (CEO) is responsible for data protection compliance on behalf of the Trust.

#### **Data Controller**

Keystone Academy Trust  
Westbourne Park, Bourne, Lincs. PE10 9QS  
Website: [www.keystoneacademytrust.org.uk](http://www.keystoneacademytrust.org.uk)

#### **Data Protection Officer (DPO)**

Joe Lee  
Ark ICT Solutions  
Email: [dpo@ark.me.uk](mailto:dpo@ark.me.uk)

### **What categories of information are processed?**

The categories of personal information that we process include, but are not limited to:

- Personal identifiers, contacts and characteristics – e.g. name, date of birth, contact details and postcode
- Role and engagement information – e.g. whether you are a member, trustee, governor or volunteer; your role title; school/academy (if applicable); start and end dates; availability; and any induction/training records relevant to the role.
- Governance information (for members, trustees and governors) – e.g. role, start date, end date, declarations of interest and (where relevant) ID documents.

- Evidence of safeguarding and safer recruitment checks – e.g. identity checks and vetting information, and records of checks carried out and recorded on the trust’s Single Central Record (including DBS-related information where appropriate).
- Evidence of checks specific to governance roles where applicable – e.g. Section 128 direction checks (where relevant to the role).
- Parent/carer contact details (for example, emergency contact information for young volunteers).
- School/college/placement details (for example, the name of the school/college, placement organiser contact, placement dates).
- Health and safety / young person risk assessment information (where needed to assess risks and ensure safe supervision for volunteers under 18).

### **Why do we collect and use your information?**

The personal data we collect about you is essential for the trust to fulfil its official functions, safeguard children and meet legal requirements. We collect and use your information for the following reasons:

- To meet statutory duties placed upon the trust and its academies, including governance transparency requirements for members, trustees and governors.
- To support safer recruitment and safeguarding, including carrying out and recording appropriate checks for volunteers, and ensuring individuals are suitable for their role.
- To administer and manage your appointment/engagement, induction, training and ongoing governance/volunteering arrangements within the trust.
- To maintain accurate records, manage conflicts of interest (where relevant), and demonstrate accountability and good governance.

### **Lawful basis for processing**

Under the UK General Data Protection Regulation (UK GDPR), the trust relies on one or more lawful bases to process personal information. In most cases, we process information because it is necessary to comply with a legal obligation or to carry out tasks in the public interest/our official functions. For governance roles, academy trusts have a legal duty to provide specified governance information (for example, through the DfE’s governance database) in accordance with the ‘Academy Trust Handbook’ (<https://www.gov.uk/guidance/academy-trust-handbook>).

Linking purposes and lawful bases (summary):

- Governance transparency (e.g. GIAS, website publication, Companies House where applicable): Legal obligation and/or public task (official functions).
- Safeguarding and safer recruitment/vetting (including recording checks): Legal obligation and/or public task (official functions).
- Administration of appointments/engagements, induction and training: Public task (official functions) and/or legal obligation where required.

### **Special category and criminal offence data (safeguarding/safer recruitment)**

Where we process special category data and criminal offence data for safeguarding, safer recruitment and vetting purposes, we only do so where this is lawful, necessary and subject to appropriate safeguards. For example, for the purpose of checking prohibition from management of an academy (Section 128).

This data is processed under Article 9(2) UK GDPR where necessary (e.g. for reasons of substantial public interest, including safeguarding of children), supported by the relevant provisions in Schedule 1 of the Data Protection Act 2018.

Information relating to criminal convictions and DBS checks is processed in accordance with Article 10 UK GDPR and Schedule 1 of the Data Protection Act 2018 for safeguarding and suitability purposes.

### **How do we collect your information?**

We collect personal information via methods including (as relevant to your role):

- Member/trustee/governor recruitment and appointment processes (for example, applications through My New Term and self-disclosure forms).
- Volunteer recruitment and onboarding processes (for example, volunteer application through My New Term).
- Identity and safeguarding/vetting processes, including DBS-related processes and Single Central Record administration.
- Ongoing administration of governance and volunteering records (for example, training/induction records, and declarations of interest where relevant).

We may also receive relevant information from other sources where appropriate, such as referees, organisations providing vetting/checking services, or public registers (for example, Companies House), where this is necessary for your role/engagement.

Where relevant (for example, for sixth-form or other placement volunteers), we may also receive information from a school/college or placement organiser, or from a parent/carers, where this is necessary to arrange and supervise the placement safely.

Governance roles data is essential for the school'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.

Some information is required to enable the trust to complete statutory governance reporting (GIAS/website publication) and safeguarding checks. If required information is not provided, we may be unable to appoint/continue the role or permit volunteering in regulated settings.

### **Young volunteers (under 18)**

If you volunteer with us and you are under 18, we may also collect and use information needed to keep you safe and support you properly in school. This can include the contact details of a parent/carers, school/college placement details (where relevant), and information from health and

safety risk assessments and supervision arrangements.

We will provide this information in clear language. A parent/carer can help you understand this notice, and you (and/or your parent/carer) can contact our Data Protection Officer (DPO) using the details in this notice if you have questions or want to use your data protection rights

### **How do we store your information?**

Personal data relating to members, trustees, governors and volunteers is retained for the duration of the individual's role/engagement and thereafter in accordance with statutory governance, safeguarding and company law requirements, as set out in the trust's Records Management Policy (which can be found on our website). Information is securely disposed of once it is no longer required.

Relevant information may be held on secure online systems used by the trust (for example, Online Single Central Record, Governor Hub and The National Governance Association), with access restricted to authorised personnel only.

For more information about how we securely store your information, please see the trust's Cyber Security Policy.

### **International transfers**

We do not routinely transfer your personal data outside the UK. If any processing involves a transfer outside the UK, we will ensure appropriate safeguards are in place in line with data protection law.

### **Who do we share your information with?**

We routinely share information (where required and relevant) with organisations including:

- Our local authority (LA).
- The Department for Education (DfE) – for governance information relating to members, trustees and governors.
- The Lincoln Diocesan Board of Education (where applicable).
- Companies House (limited trustee information where required).
- Trust and school websites (publication of governance information where required).
- Organisations involved in safeguarding/vetting checks where required (for example, DBS-related processing and checking services).

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

We share personal information where this is necessary to comply with our legal obligations, fulfil our statutory duties, to safeguard children, or where it is otherwise permitted under data protection law. This processing does not generally rely on consent. Where consent is required for a specific, limited purpose, this will be made clear at the point of collection.

### **The LA**

We may share information with our LA where this is required by law or necessary to fulfil our statutory duties and official functions.

## **The DfE (governance information)**

The DfE collects personal data from schools and local authorities. We are required to share information about individuals in governance roles (members, trustees and governors) with the DfE to meet governance transparency requirements, in accordance with the 'Academy Trust Handbook'.

Governance data shared with the DfE via GIAS helps to:

- Increase the transparency of governance arrangements.
- Enable schools 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 uniquely identify an individual and, in a small number of cases, conduct checks to confirm suitability for the role.

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>

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

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

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>.

## **The Lincoln Diocesan Board of Education**

We share information about governors, trustees and members with the diocese to enable them to fulfil their responsibilities for oversight, ensuring appointees:

- Protect the Church of England designation of the Church of England academy;
- Ensure that the trust is conducted in accordance with the principles, practices and tenets of the Church of England;
- Ensure that the trust is conducted in accordance with the principles, practices and tenets of the Church of England in relation to arranging for religious education and daily acts of worship, always having due regard to the advice and guidance of the Lincoln Diocesan Board of Education.

### **Companies House**

We share limited personal information about trustees with Companies House where required, as this processing is necessary to comply with our legal obligations as a charitable company (UK GDPR Article 6(1)(c)).

### **Trust and School Websites**

We publish the names of governors, trustees and members on our trust and school websites to meet statutory transparency requirements and to demonstrate clear accountability for the governance and strategic oversight of the trust.

### **What are your rights?**

You have specific rights in relation to the processing of your personal data, including the right to:

- Request access to the information the trust holds about you.
- Request that inaccurate or incomplete personal data is rectified, blocked, erased or destroyed.
- Request the restriction of processing in certain circumstances, e.g. consenting to it being stored but restricting it being processed any further.
- Object to processing in certain circumstances (including direct marketing and processing for the purpose of scientific or historical research and statistics).
- Request erasure in certain circumstances where there is no compelling reason for continued processing.
- Not be subjected to decisions based solely on automated processing where it produces a legal or similarly significant effect. We do not make decisions about governance appointments or volunteering based solely on automated processing (including profiling).
- Request data portability, where processing is based on consent or contract and carried out by automated means.

Where we rely on consent for a specific, limited purpose, you have the right to withdraw your consent at any time. Where we rely on legal obligation or public task, withdrawal of consent will not apply.

### **Contact Details**

If you want to request access to the personal information we hold about you, please contact the trust Data Protection Officer (DPO) on [dpo@ark.me.uk](mailto:dpo@ark.me.uk).

### **How to withdraw consent and lodge complaints**

If you are concerned or unhappy about the way we are collecting or using your information, please raise your concern or lodge a complaint with the trust's DPO in the first instance. You can also contact the ICO at <https://ico.org.uk/concerns>.

### **Updating this privacy notice**

The Trust reviews this privacy notice periodically to ensure it remains accurate and compliant with UK GDPR and the Data Protection Act 2018. Updates may be made if we change how we collect, use or share information, or if guidance or legal requirements change.

### **How can you find out more information?**

If you require further information about how we and/or the DfE store and use your personal data, please contact the DfE directly via their website <https://form.education.gov.uk>, or download our Data Protection Policy and Records Management Policy from the trust website.