



Governor, Trust Member and Trustee Privacy Notice

Introduction

We are the Greater Manchester Education Trust and appreciate the valuable support of the governors, Trust members and Trustees who work with the trust and our schools. As part of your governance role, we are required to gather and use information relating to you.

Information that we hold in relation to individuals is known as their 'personal data'. This will include data that we obtain from you directly and data about you that is generated as part of the normal working practices associated with your role such as your attendance at meetings. Anything that we do with an individual's personal data is known as 'processing', this includes collecting, storing and deleting personal data.

We are required to hold data about you during your term of office and for a period of twelve months after your term ends. Some of this data will also be published or available publicly, such as your name and your business or pecuniary interests. This document sets out what personal data we will gather and hold about our governors, Trust Members and Trustees, why we process that data, who we share this information with, and your rights in relation to your personal data processed by us.

The Trust is the Data Controller for the personal data that we process about you, this means that we are responsible for and make decisions on how your data is processed.

What data do we hold?

The categories data that we collect, process, hold and share include:

- personal information (such as name, date of birth, photograph)
- address, email addresses, telephone numbers
- special category data (such as disability and impairments, if you have disclosed them to us; and criminal/other court information)
- term of office information (such as start dates and finish dates)
- meeting information (such as the number of invites, meetings attended and apologies)
- skills and training (such as an audit of your skills, and training sessions attended)
- pecuniary interests; including relevant relationships and business interests
- DBS details (date, reference number, notes)
- a record of your acknowledgement and agreement with the governor/trustee code of conduct

Why we collect and use this information

We use the data collected to:

- comply with legal requirements – including the publication of details on the relevant websites
- comply with the Trust's safeguarding policies and procedures
- enable the development of a comprehensive picture of governor and director skills, interests and backgrounds
- inform the development of current governors and directors and to inform future recruitment needs and skills



Governor, Trust Member and Trustee Privacy Notice

- create login access to the systems where documents are shared with governors

Lawful Basis for processing

Processing of your personal data is:

- necessary for us to comply with legal obligations
- necessary for our legitimate interests or those of third parties e.g. the DfE database (Get Information about Schools), Companies House and other statutory returns
- in the public interest to have well-informed and accountable governing bodies and Trust board
- where you have given consent

Processing of your special category data is:

- where you have given explicit consent
- it is necessary for reasons of substantial public interest
- it is necessary for data collection purposes for the DfE

Where our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time by contacting the relevant school office. If you decide to withdraw consent, we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case we will let you know.

Collecting this information

Data is collected directly from you when you are appointed as a governor or trustee at the trust or one of our schools; we will need to collect general data such as your name and correspondence details to induct you and provide you with access to the resources needed to perform your role. This includes collecting your DBS check to meet our statutory duties before you can start to work with us.

Further information will be collated directly by the trust as your role with us progresses, for instance your attendance at meetings and records relating to training and other trust-based activities and work you are involved in.

If you apply through another organisation, such as the local authority, they may also pass on some data if appropriate.

Storing this information

We hold personal data about governors and directors for the duration of your term of office and for twelve months afterwards, when we are still required to publish, for example, your pecuniary interests and meeting attendance on the school website and in the annual report and financial statements.

Our 'Data Protection Policy' provides full details on our approach to information security and the measures we have implemented to keep your data protected.



Governor, Trust Member and Trustee Privacy Notice

Who do we share this information with?

Organisations and people we routinely share this information with include:

- the Department for Education (DfE)
- our school/Trust community
- the general public – limited details are required on the school website
- One Education – for clerking purposes

Why we share governor information

Department for Education (DfE)

We share personal data with the Department for Education (DfE) on a statutory basis. Some information is in the public domain, for example in the DfE's 'Get Information about Schools'.

Our school/Trust community

We are required to share information about our governors and directors as part of their role in being accountable for the performance of the school and Trust and as part of various Trust policies

The general public

We are legally required to declare the names, terms of office, pecuniary interests and meeting attendance of all governors, Trust Board members and directors on our school and Trust websites. In addition, data about Trust Board members and directors is also published in the annual report and financial statements, and by Companies House.

One Education

Currently we use One Education to provide our clerking service. They need details to contact governors and directors, provide minutes and ensure compliance with legal requirements.

In certain circumstances, the school may be required to share your data with the following third parties if an accident or incident has occurred that you are involved in or consulting upon as part of your role:

- Local Authority
- The Police, NHS and Emergency Services
- Professional Advisors (legal services etc)
- Governing Bodies including HSE & ICO
- Insurance Provider
- Courts and Legal Entities
- Auditors

We do not routinely share your data outside of the United Kingdom; if a situation arises in which we must transfer your data abroad, we will do so in accordance with the UK-GDPR.



Governor, Trust Member and Trustee Privacy Notice

Your data protection rights

Under the UK-GDPR, you have a right to access the personal data that we hold about you through a subject access request (SAR). If you make a SAR and we do process the data you have requested access to, we will:

- Give you a description of it
- Explain why we are processing it and how long we will hold it
- Explain where we collected the data if not from you
- Outline if the data has been or will be shared with any other parties
- Inform you if any automated decision making has been applied to the data and provide any consequences of this
- Provide you with a copy of the data in an intelligible form.

Along with the right to access your personal data, you also have the following rights:

- The right to ask us to rectify any personal information you feel is inaccurate or incomplete
- The right to ask us to erase your personal data in certain circumstances
- The right to ask us to restrict the processing of your personal data in circumstances
- The right to object to the processing of your personal data in certain circumstances
- The right to ask us to transfer the personal data you provided to another organisation in certain circumstances.

You will not be required to pay any fee for exercising your rights; if you make a request the school will respond within one calendar month. Please contact us if you wish to make a request.

Complaints

If you have any concerns at all about how we process your personal data, please contact the School Business Manager in the first instance so that we can help resolve any issues. If you would like to discuss anything in this privacy notice, please contact:

Kate Wragg: Trust Data Protection Lead at cwragg@gmetrust.org

If an individual wishes to pursue concerns further, please contact our Data Protection Officer: Danielle Eadie, Data Protection Consultant, RADCaT Ltd, Registered Office: 6 Seven Stars Road, Wigan, WN3 5AT. Email: danielle.eadie@radcat.co.uk

You can also complain to the Information Commissioners Office (ICO) if you are unhappy with how we have used your data:

Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF. Helpline: 0303 123 1113. Website: <https://www.ico.org.uk>