



Members, Trustees, Academy Committee Representatives and Clerks

This privacy notice is intended to provide information about how Sherborne Area Schools' Trust (SAST) will use (or process) the personal data of members, trustees, academy committee (AC) representatives and academy committee clerks. Additional information is included for clerks, as employees, within the workforce privacy notice.

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Responsibility for data protection

- SAST is the 'data controller' for the purposes of data protection law.
- The Data Protection Officer (DPO) is Moira Lyons-Montgomery who can be emailed at dpo@sast.org.uk.
- The data protection lead for governance related matters is the Governance Professional, Brida Skipworth, clerk@sast.org.uk.
- The DPO will deal with requests and enquiries concerning the Trust's uses of personal data.
- The DPO and governance professional will endeavour to ensure that your personal data is used lawfully and compliantly.

The personal data we hold about you

We hold some personal information about you when you are a member, trustee, academy representative or clerk for our Trust.

This includes:

- personal identifiers (such as name, address, contact details, gender, date of birth)
- Special Category characteristics (disability, religion)
- Role related details (such as role, start and end dates)
- details of your training, meeting attendance and information you provide in regard to pecuniary or business interests
- images of you collected when you sign in to visit a school or require an identity badge

- CCTV, if you visit a SAST site where this is deployed
- visitor sign in information registered when you enter a school setting
- information recorded in minutes of panels and meetings.

This list is not exhaustive.

Why we use this data

We use this data to help operate the Trust including:

- to meet the statutory duties placed upon us
- to communicate with you about relevant school or Trust business
- to procure appropriate training for you to fulfil your role
- to meet the requirements of auditory processes and financial regulation

Our legal basis for using this data

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- *Article 6 (c) Legal obligation:* the processing is necessary for us to comply with the law

Some information we process will be Special Category data under Article 9 of UK GDPR e.g. disability. We will rely on the legal basis of *Article 9 (g)* processing is necessary for reasons of substantial public interest.

All academy trusts, under the [Academies Financial Handbook](#) have a legal duty to provide the governance information as detailed above.

Collecting this information

Governance data is essential for the Trust's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it may be 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.

Data sharing

For the most part, personal data collected will remain within the Trust and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis).

We may routinely share information with:

- the Department for Education (DfE) on Get Information About Schools (GIAS)
- Companies House (for Trustees and Members)
- Salisbury Diocese Board of Education
- Bath and Well Diocese Board of Education
- The National Governance Association

When required by regulation we may share information with:

- A SAST payment or banking facilitator conducting anti monetary laundering sanction checks

The Department for Education

We are required to share information about individuals in governance roles with the (DfE) under the requirements set out in the [Academies Financial Handbook](#)

All data is entered manually on the GIAS system and held by DfE under a combination of software and hardware controls which meet the current [government security policy framework](#)

For more information, please see the Appendix.

The Dioceses

We are required to share information about individuals in governance roles with the relevant Diocese to maintain their dashboard which forms part of their safer recruitment processes.

All data is entered manually on Diocese microsite systems which are maintained by each Diocese using software controls. [SDBFDataProtectionPolicy2018.pdf \(diocese.se\)](#)

International transfers of personal data

We have audited where we store all the personal data processed in the Trust and by third party services. If a third-party service stores data in the US, we have ensured that safeguards such as standard contractual clauses are in place to allow the safe flow of data to and from the Trust.

How we store this data

We hold governor data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and the Information Commissioner's Office of a suspected data security breach where we are legally required to do so.

Your rights

How to access personal information we hold about you

Under data protection legislation, our governors have the right to request access to information about themselves that we hold. To make a request for your personal information, contact the Trust.

If we do hold information about you, we will:

- give you a description of it
- tell you why we are holding and using it, and how long we will keep it for
- explain where we got it from
- tell you who it has been, or will be, shared with

Your other rights over your data

Individuals also have the right, in certain circumstances, to:

- have inaccurate or incomplete personal data about them rectified
- request the deletion or removal of personal data where there is no compelling reason for its continued processing. There are limitations and exceptions to this right which may entitle SAST to refuse your request.
- restrict processing of personal data where there is no compelling reason for its continued 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 them
- have your data transferred to another organisation
- object to the processing of their personal data.

If an individual wants to exercise any of these rights then they should contact dpo@sast.org.uk. The law does not oblige the Trust to comply with all requests. If the Trust does not intend to comply with the request then the individual will be notified of the reasons why in writing.

Complaints

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we've done something wrong by contacting our data protection officer, dpo@sast.org.uk

You can also complain to the Information Commissioner's Office in one of the following ways:

- report a concern online at <https://ico.org.uk/concerns/>
- call 0303 123 1113
- write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Appendix. How Government uses your data

The governance data that we lawfully share with the DfE via GIAS and Companies House:

- will increase the transparency of governance arrangements
- will enable schools and the department to identify more quickly and accurately individuals who are involved in governance and who govern in more than one context
- allows the department to be able to uniquely identify an individual and in a small number of cases conduct checks to confirm their suitability for this important and influential role

Data collection requirements

To find out more about the requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/government/news/national-database-of-governors>

Note: Some of these personal data items are not publicly available and are encrypted within the GIAS and Companies House system. Access is restricted to the number of DfE staff who need to see it in order to fulfil their official duties. The information is for internal purposes only and not shared beyond the department, unless the law allows it.

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:

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

Further information on how to do this can be found within the DfE personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>