

Privacy Notice Trustees, Members & Governors

Under the data protection law ([the General Data Protection Regulation](#)), individuals have a right to be informed about how the Trust uses any personal data that we process.

‘Processing data’ refers to collecting, using, storing and sharing data (when appropriate)

We comply with this legal requirement by providing ‘privacy notices’ (sometimes called ‘fair processing notices’) to individuals where we are processing their personal data.

This privacy notice explains how we process personal data about **our Trustees, Members and Governors**.

Primitas Learning Partnership, The Old Mining College, Queen Street, Burntwood, WS7 4QH, Tel: 01543 229937 is the ‘data controller’ for the purposes of data protection law and is responsible for how your personal information is processed and for what purposes.

Primitas Learning Partnership is registered for this purpose with the Information Commissioner’s Office (ICO).

The Data Protection Officer (DPO) for Primitas is Jackie Hesslegrave who can be contacted via dpo@primitas.co.uk.

The Personal Data We Process

Personal data about Trustees, Members and Governors that we may process includes, but is not restricted to:

- Personal details
- Contact details
- Professional details
- Relevant business and pecuniary interests details
- Role application details
- Selection records
- References
- DBS and safer recruitment checks
- Identity verification records
- Meeting attendance records
- Records of communications
- Records of visits to academies
- Photographs of you or images on CCTV
- Information to identify you in the Trust and its academies
- Records of work you do in conjunction with our staff or students
- Notes of meetings you may have attended
- A biography/profile that may be published on our websites

We also are required to collect and use information that is given additional protection under the GDPR, for example;

- Demographic information required for monitoring equal opportunities

We may also hold data that we have received from other organisations, including other schools or academies, local authorities and the Department for Education.

Why We Use This Data

The personal data collected is essential, in order for the Trust, and its Academies to fulfil their official functions and meet legal obligations.

We use this data to:

- To enable you to work with us
- To maintain a safe environment for our students and facilitate safe recruitment as part of safeguarding obligations towards students
- To enable you to take part in appropriate training and professional development
- To meet the statutory duties placed upon us
- To ensure your health and safety
- To keep you up to date with news about the Trust and its academies

Use of Personal Data in Automated Decision-Making and Profiling

We do not currently process any Trustee, Member or Governor's personal data through automated decision-making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing including the right to object to it.

Use of Your Personal Data for Filtering and Monitoring Purposes

We may monitor your use of our information and communication systems, equipment and facilities (e.g. Academy and Trust network systems).

We do this so that we can;

- Comply with Health and Safety and other legal obligations
- Comply with our policies (e.g. Child protection and IT acceptable use policies and our legal obligations)
- Keep our networks and devices safe from unauthorised access and prevent malicious software from harming our networks
- Protect student welfare

Our Legal Basis for Using this Data

Depending on the purpose, our use of your information will be legal due to one of the following:

- To meet the terms of a contract
For example: Recording your personal and contact details
- To meet a legal requirement GDPR [Article 6(1)(c)]
For example: Providing information to DfE
- To protect the vital interests of you or someone else GDPR [Article 6(1)(d)]
For example: Giving your contact details to emergency services
- Delivering a public task GDPR [Article 6(1)(b)]
For example: Keeping records of your meetings with governors

Academy Trusts, under the [Academy Trust Handbook](#) have a legal duty to provide the governance information as detailed above.

Where we use special category personal data we process this under the following exemptions from Section 9 of GDPR:

- Information used in the field of employment GDPR [Article 9(2)(b)]
For example: Using information about ethnic origin for equality monitoring purposes

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the Trust's use of your data.

Change of Purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Collecting this Information

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying and our legal basis for doing so.

How We Store this Data

We keep personal information about Trustees, Members and Governors while they are serving academies within our trust. We may also keep it beyond their term of office with our trust if this is necessary in order to comply with our legal obligations. Our [Document Retention Policy](#) sets out how long we keep information about Trustees, Members and Governors.

Data Sharing

We do not share information about Trustees, Members or Governors with any third party without consent unless the law and our policies or internal procedures allow us to do so.

We routinely share this information with:

- our schools via the governance platform
- our local authority (where applicable)
- the Department for Education (DfE)

- **Department for Education**

The Department for Education (DfE) 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). We are required to share information about individuals in governance roles with the (DfE) under the requirements set out in the [Academy Trust Handbook](#)

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

- **Ofsted**

To provide information to our regulator to support their evaluative work of our provisions such as Governance and safer recruitment practices

- **Judiciary and Policy Bodies**

To meet our legal obligations to share certain information such as criminal concerns or legislative matters.

- **Contractors and Service Providers**

To provide information in order for the contractor to provide their services such as Governance Support Services

Transferring Data Internationally

Where we transfer personal data to a country or territory outside the UK, we will do so in accordance with data protection law.

Rights Regarding Personal Data

Individuals have a right to make a **‘subject access request’** to gain access to personal information that the Trust holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing 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
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please [contact our data protection officer](#)..

Other Rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, without any human intervention)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing

To exercise any of these rights, please [contact our data protection officer](#).

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 on 3rd March 2025.

Complaints

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance. To make a complaint, [please follow our complaints procedure](#).

Contact Us

To exercise any of these rights, please [contact our data protection officer](#)..

How Government Uses Your Data

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

- will increase the transparency of governance arrangements
- will enable maintained schools and academy trusts 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>

Some of these personal data items are not publicly available and are encrypted within the GIAS system. Access is restricted to authorised Department for Education (DfE) and education establishment users with a Department for Education (DfE) Sign-in (DSI) account 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 for Education (DfE) unless the law allows it.

How to find out what Personal Information the Department for Education (DfE) Holds About You

Under the terms of the [Data Protection Act 2018](#), you're entitled to ask the Department for Education (DfE):

- 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 Department for Education (DfE), you should make a subject access request (SAR). Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:

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

or

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

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