

Privacy Notice (How we use Member/Trustee/Committee and Academy Council Member information)

Abbey College is classed as a 'Data Controller' under the UK General Data Protection Regulation (UKGDPR). Abbey College is registered with the Information Commissioner's Office and follows the principles of the UKGDPR. This privacy notice covers all members, trustees, Policy & Scrutiny Members and Academy Council members for Abbey College.

We take the privacy of all our volunteers in governance roles seriously and this notice outlines what sort of personal data we collect, why we do this, how long we store it and who we share it with. Access to personal data is only available to those who need it for a specific purpose.

1. Keep us up to date

It is important that you let us know if there are any changes to your situation or personal details. This is so that we can manage your data and communicate with you safely and quickly. Please let us know straight away if any of the following change:

- Your name • Address • Phone number (including mobile) • Email address

We will contact you using the most recent address, email or phone number you have given us. If you do not tell us promptly about a change in your details, you may not receive information that could be important – or it could fall into the wrong hands. Where you have provided an e-mail address, we will use this for important messages that relate to you.

2. The categories of Member/Trustee/Committee Member information that we collect, hold and share include:

The categories of staff and volunteer information that we collect, process, hold and share include, but is not limited to, the following:

- Personal information (such as name, gender, address and contact information)
- Information provided in your application form, skills audit, declaration of pecuniary interests, references and information for DBS checks in accordance with DBS regulations
- Governance details (such as role, start and end dates and Governor ID)
- Images through Photographs
- Images through CCTV at various locations around the site
- We may monitor or record telephone calls for training and quality assurance purposes

We may also collect, store and use information about you that falls into "special categories" under UKGDPR. This is a sub-category of personal data that requires heightened protection measures due to its sensitive and personal nature. This includes the following (where applicable):

- personal data revealing racial or ethnic origin
- personal data revealing political opinions
- personal data revealing religious or philosophical beliefs
- personal data revealing trade union membership
- genetic data
- biometric data (where used for identification purposes)
- data concerning health (including but not limited to medical conditions, medication, special needs, disabilities, allergies, dietary conditions)
- data concerning a person's sex life
- data concerning a person's sexual orientation

3. Why we collect and use this information

We use the data to:

- Meet the statutory duties placed upon us
- maintain a governance database
- assess and report on vacancies within Abbey College
- plan training and succession
- to share data for statutory inspections and audit purposes. This includes but is not limited to publishing declarations of interest and attendance records on academy and/or trust website and submitting required details to Companies House (trustees) and Department for Education's database (Get Information about Schools)
- for detection/prevention of crime (CCTV footage)
- publish blurbs on academy/trust website with your explicit permission
- meet our obligations within minutes of meetings, copies of which are held permanently

The College may make use of limited personal data relating to all in governance roles for fundraising, marketing and promotional purposes such as school prospectus and to maintain relationships with stakeholders.

4. The lawful basis on which we use this information

We collect and use governor/trustee information under:

- UK General Data Protection Regulation
 - Article 6(1)(a) – consent
 - Article 6(1)(c) – legal obligation
 - Article 6(1)(e) – public task
 - Article 9(2)(a) – explicit consent
 - Article 9(2)(g) – substantial public interest

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

Our disclosure of personal data is lawful for the following reasons:

- Abbey College is under a legal obligation to disclose the information or disclosing the information is necessary for us to meet legal requirements imposed upon us such as our duty to look after our pupils and protect them from harm.
- It is necessary for us to disclose information for the purposes of our functions in providing schooling. This is a function which is in the public interest.
- We have a legitimate interest in disclosing information because it is necessary in order to provide our pupils with education and pastoral care and connected purposes as outlined above.
- We will not usually need consent to disclose your information. However, if at any time it appears to us that we would need consent then this will be sought before a disclosure is made.

5. Collecting governance/trustee Information

During the recruitment process we may receive information about you from a previous employer or an educational establishment which you have previously attended. You will know about this because you will have supplied us with the relevant contact details.

Whilst the majority of information provided to us by volunteers in governance roles is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the UK General Data Protection Regulation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

6. Storing member/trustee/Committee member data

We hold all data securely for the set amount of time shown in our retention schedule. For more information and to view our Data Retention Policy please visit

<https://www.abbeycollege.cambs.sch.uk/>

We do not normally transfer information to a different country which is outside the European Economic Area. This would only happen if you move to that country and specifically ask us. If this happens, we will be very careful to make sure that it is safe to transfer the information.

We will look at whether that other country has good data protection laws for example. If we cannot be sure that it is safe then we will talk to you about it and make sure that you are happy for us to send the information. As this is not something we normally do, and we do not know which country we might need to send information to, we cannot provide more information about it now but if we want to transfer data to a different country then we will tell you whether or not we think it is safe and why we have decided that.

7. Who we share member/trustee/Committee Member information with

We treat all information we hold about you private and confidential to our organisation. We will not reveal any personal details concerning you to anyone not connected with The College or listed below unless:

- You ask us to provide information, or we have your consent to do so
- We are required or permitted to do so by law, including but not limited to sharing minutes of meetings, publishing attendance and pecuniary interests
- It is required by law enforcement
- There is a duty to the public to reveal the information, e.g. regulatory bodies, tax authorities, the Department for Education or Education and Skills Funding agency.

We routinely share information with:

- the Department for Education (DfE)
- Cambridge Meridian Education Trust
- Members of staff
- Others in governance roles
- Other Academies within the Trust
- OFSTED
- External auditors
- Companies House

Additional third party disclosures can be found within our Data Protection Policy. We use a selection of cloud hosted solutions throughout the Trust to provide educational services. We only use providers who have a GDPR policy, have undertaken a self-certification process and are on the DfE's approved cloud services list. We will only use cloud services where we can be confident that our data is processed within the UK or EU and subject to the UKGDPR requirements.

The latest version of the policy can be downloaded from our website – <https://www.abbeycollege.cambs.sch.uk/>

The information disclosed to these people / services may include sensitive anonymised personal information about the volunteers in governance roles; usually this means information about ethnicity, language and nationality where applicable.

When you give us information about another person, you need to ensure you have permission from them to provide us with their information.

8. Why we share information

We do not share information about our members/trustees/Committee and Academy Council with anyone without consent unless the law and our policies allow us to do so. We share data with the Department for Education (DfE) on a statutory basis. We are required to share information about individuals in governance roles with the Department for Education (DfE) under the requirements set out in the Academy Trust Handbook

All data is entered manually on the Get Information About Schools (GIAS) system and held by DfE under a combination of software and hardware controls which meet the current government security policy framework.

Attendance data, terms of office, and pecuniary interests are published on the trust/academy website and included in financial statements for trustees and Finance and Audit & Risk Committee members, which are submitted to Companies House.

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

9. How Government uses your data

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

- increase the transparency of governance arrangements
- enable maintained schools, academies, academy trusts and the DfE to identify more quickly and accurately individuals who are involved in governance and who govern in more than one context
- allow 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 DfE 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 DfE and education establishment users with a DfE Sign-in 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, unless the law allows it.

How to find out what personal information DfE hold about you

Under the terms of the Data Protection Act 2018, you are 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 are 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, you should make a subject access request (SAR). Further information on how to do this can be found within the department's personal information charter that is published at the address below:

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

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

12. Requesting access to your personal data

Information about you will be held by us in both paper form and on our IT systems and will be kept in line with our retention procedures.

Under data protection legislation, you have the right to request access to information about you that we hold.

To make a request for your personal information, contact the Data Protection Officer Abbey College or by email dpo@cmatrust.net or write to Data Protection Officer, Meridian Trust, Meridian Trust Offices, Fen Lane, Sawtry, PE28 5TQ.

We will need to see proof of identity to ensure we are not releasing data to the wrong person. There may be a small administrative fee for this service – if so, we will make this clear.

You also have the right to:

- ask us to correct any information we have about you if you think it is wrong or incomplete
- ask us to erase information about you (although we may have good reasons why we cannot do this)
- ask us to limit what we are doing with your information
- object to what we are doing with your information
- ask us to transfer your information to another organisation in a format that makes it easy for them to use

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance to the DPO via the contact details above.

Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

13. Automated Decision-Making Processes

We do not employ any automated decision-making processes within our trust. If we did, you would have the right to:

- Give written notice requiring us to not take any automated decision using your personal data
- Be informed of when an automated decision is taken
- Ask us to reconsider a decision taken by automated means

If, in the future, we move to using automated decision-making processes, we will notify you of this and of your rights under the regulations.

If at any time you are not happy with how we are processing your personal information, then you may raise the issue with the Data Protection Officer on the contact details above and if you are not happy with the outcome you may raise a complaint with the Information Commissioner's Office:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113 (local rate)

14. Contact

There is more information in our Data Protection Policy which can be downloaded from our website – <https://www.abbeycollege.cambs.sch.uk/>

If you would like to discuss anything in this privacy notice, please contact the Data Protection Officer at Abbey College or by email dpo@cmatrust.net or write to Data Protection Officer, Meridian Trust, Meridian Trust Offices, Fen Lane, Sawtry, PE28 5TQ.

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 March 2022.