



**omega**  
MULTI-ACADEMY TRUST

# Privacy Notice

## Members, Trustees and Governors

<b>Version Number</b>	1.00
<b>Date policy last reviewed</b>	August 2024
<b>Policy Type</b>	Mandatory
<b>Owner</b>	Director of Governance and Compliance
<b>Approved By</b>	Trust Board
<b>Approval Date</b>	8 <sup>th</sup> October 2024
<b>Next Review Date</b>	August 2025

## Review Date and Summary of Changes

Date of review	Summary of changes
August 2024	No changes

Signed by:

Chief Executive Officer

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Date: 8<sup>th</sup> October 2024

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Chair of Trustees

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Date: 8<sup>th</sup> October 2024

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## 1. Statement of intent

Under UK data protection law, individuals have a right to be informed about how the trust, and each of our schools, uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **individuals working with our trust in a voluntary capacity, including members, trustees and local governors.**

Omega Multi-Academy Trust, Lingley Green Avenue, Great Sankey, Warrington, WA5 3ZJ, is the 'data controller' for the purposes of UK data protection law.

## 2. Legal framework

This policy has due regard to all relevant legislation including, but not limited to, the following:

- The General Data Protection Regulation (UK GDPR)
- Data Protection Act (2018)
- The Freedom of Information Act 2000
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The School Standards and Framework Act 1998

This policy will also have regard to the following guidance:

- The Academy Trust Handbook

This policy operates in conjunction with the following Trust/school policies;

- Freedom of Information Policy
- Complaints Procedures Policy
- Online Safety Policy
- Photography and Images Policy
- Trust Record of Processing Activity
- School Surveillance and CCTV Policy
- Trust Data Retention Policy

## 3. The Personal Data We Hold

The categories of governance information that we may collect, store and share about you includes, but is not limited to:

- Personal identifiers: such as name and date of birth
- Contact details: such as phone numbers and post code
- Evidence of qualifications:
- Information about business and pecuniary interests
- Governance details: such as role, start and end dates, attendance at meetings

We may also collect, use, store and share (when appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Information about any health conditions you have that we need to be aware of
- Information about disability and access requirements
- Photographs and CCTV images captured in school/on site

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

#### 4. Why we use this data

The personal data collected is essential in order for the Trust to fulfil its official functions and meet legal requirements. We use the data listed above to:

- Establish and maintain effective governance
- Meet statutory obligations for publishing and sharing details about members, trustees and local governors
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Undertake equalities monitoring
- Ensure that appropriate access arrangements can be provided for volunteers who require them

We do not currently process any members'/trustees'/local governors'/other volunteers' 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 to you, including your right to object to it.

#### 5. Our legal basis for using this data

**Public task:** The Trust needs to process data about criminal convictions and offences to fulfil the statutory function as a trust in accordance with:

- The Academy Trust Handbook 2023
- Keeping Children Safe in Education 2023 guidance

**Legal obligation:** The Trust has a legal duty to provide personal and governance information as detailed in 3. above.

This is recorded in the Department for Education (DfE) register Get Information about Schools (GIAS). All governance boards for state maintained establishments and academy trusts are required to provide information about people involved in governance for the organisation via GIAS which is also the National Database of Governors. It is essential that this information is kept up to date in accordance with The Education Act 1996 and the Academy Trust Handbook.

Governance data and information about business and pecuniary interests must be published on the Trust's / schools' websites in accordance with the Academy Trust Handbook.

## **6. Collecting governance information**

Your personal information is collected via:

- An application for the position of governor or trustee, received from you or via a third party, for example Governors for Schools
- By you recording your information into the governance site GovernorHub

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 you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Government departments or agencies – for example when the school applies for a DBS and section 128 check.

## **7. Storing Governor Information**

Your personal information is held securely within GovernorHub and is only held while you volunteer in the Trust. Details of your business interests are held for 12 months following you leaving the Trust as a trustee or governor in accordance with the Academy Trust Handbook 2023. We follow the Information Commissioner's guidance on retention of documents, including the Information and Records Management Society's Retention Guidelines for School.

## **8. Who the Trust shares governance information with**

Where it is legally required, or necessary (and it complies with UK data protection law), we may share personal information about you with:

- Government departments or agencies
- Our regulator, Ofsted
- Our auditors
- Professional advisers and consultants
- Police forces, courts or tribunals

## **9. Why we share governance information**

We do not share information about you with any third party without consent unless the law and our policies allow us to do so.

The DfE collects personal data from educational providers and local authorities. 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 DfE under a combination of software and hardware controls which meet the current government security policy framework.

## **10. Requesting access to your personal data**

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, please contact [dpo@omegamat.co.uk](mailto:dpo@omegamat.co.uk)

You have the right to :

- Ask us for access to information about you that we hold
- Have your personal data rectified if it is inaccurate or incomplete
- Request the deletion or removal of personal data where there is no compelling reason for its continued processing
- Restrict our processing of your personal data (ie permitting its storage but no further processing)
- Object to direct marketing, including profiling, and processing for the purpose of scientific/historical research and statistics
- Not be subject to discussions based purely upon automated processing where it produces a legal or similarly significant effect on you.

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office.

## **11. 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 local authority maintained schools, academy trusts and the Department for Education to identify more quickly and accurately individuals who are involved in governance and who govern in more than one context.
- Allow the Department for Education 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.

## **12. 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 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 DfE unless the law allows it.

## **13. How to find out what personal information the Department for Education (DfE) hold about you**

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

- 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, you should make a subject access request. Further information on how to do this can be found within the DfE'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>

## 14. 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.

You can make a complaint at any time by contacting our data protection officer. 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
- Or write to: Information Commissioner's Office, Wycliffe House, Water lane, Wilmslow, Cheshire, SK9 5AF

## 15. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer via:

[dpo@omegamat.co.uk](mailto:dpo@omegamat.co.uk)

## 16. Review

This Privacy Notice will be reviewed annually by the Board of Trustees.