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**Privacy Statement – Members, Trustees and Local Governors Data – FI12(E)**

**Three Counties Academy Trust (TCAT)**

**Effective Date:** Academic year 2024-2025 **Last Reviewed:** February 6th, 2025

**1. Introduction**

Three Counties Academy Trust, commonly referred to as TCAT, is committed to protecting the privacy and security of personal data. This privacy statement explains how we collect, use, and share **Members, Trustees and Local Governors** data across all schools within TCAT in compliance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

TCAT is the **Data Controller** for the personal data held by our schools unless otherwise stated. Each school within TCAT follows this privacy statement to ensure consistency in data protection practices.

**2. What Data We Collect**

We collect, store, and process the following categories of Members, Trustees and Local Governors data:

* **Personal Information** – Name, title, date of birth, and gender
* **Contact Information** – Home address, email address, phone numbers
* **Identification and Governance Details** – Role within TCAT, date of appointment, term of office, resignation date (if applicable)
* **Employment and Professional Background** – Occupation, qualifications, skills, and experience relevant to governance responsibilities
* **Public Declarations** – Register of interests, related party transactions, and conflicts of interest disclosures
* **Financial Information** – Bank details (if claiming expenses) and records of financial transactions
* **Statutory Checks and References** – Disclosure and Barring Service (DBS) checks, references, and right-to-work documents where applicable
* **Correspondence and Meeting Records** – Emails, letters, and minutes from governance meetings
* **Safeguarding and Welfare Information** – Where applicable, data related to safeguarding responsibilities
* **Photographs and Video** – For identification, governance records, school events, and promotional materials (with consent where required)
* **CCTV Footage** – If Members, Trustees, or Local Governors visit TCAT schools where CCTV is in operation

**3. Why We Collect and Use Members, Trustees and Local Governors Data**

We process Members, Trustees and Local Governors data under the following lawful bases as defined under UK GDPR:

* **Legal Obligation (Article 6(1)(c))** – To comply with statutory governance, financial, and safeguarding duties
* **Public Task (Article 6(1)(e))** – To carry out governance responsibilities in the public interest
* **Legitimate Interests (Article 6(1)(f))** – Where processing is necessary for the Trust’s operations, balanced against individual rights
* **Consent (Article 6(1)(a))** – For activities such as promotional materials and event photography
* **Vital Interests (Article 6(1)(d))** – Where necessary to protect someone’s life (e.g., in medical emergencies)

Additionally, we may process **special category data** (e.g., health, ethnicity, and SEND data) under **Article 9(2)(b) and (g) UK GDPR**, as processing is necessary for reasons of substantial public interest, safeguarding, or legal obligations.

**4. How We Use Members, Trustees and Local Governors Data**

We use Members, Trustees and Local Governors data for the following purposes:

* To maintain statutory governance records and comply with legal requirements
* To manage trustee and governor appointments, terms of office, and resignation processes
* To process DBS checks and ensure compliance with safeguarding regulations
* To administer governance meetings, including invitations, minutes, and correspondence
* To maintain and publish the register of interests, related party transactions, and financial disclosures
* To comply with regulatory reporting requirements, including submissions to the Department for Education (DfE), Education and Skills Funding Agency (ESFA), and Companies House
* To provide training and development opportunities
* To facilitate effective communication between governance members, schools, and TCAT leadership
* To ensure health and safety compliance when visiting school sites
* To manage security, including visitor logs, ID badges, and CCTV monitoring

**5. How We Store and Protect Members, Trustees and Local Governors Data**

We take the security of Members, Trustees and Local Governors data seriously and implement the following measures:

* **Physical Security** – Secure storage of paper records in locked areas
* **Technical Security** – Encryption, password-protected systems, secure cloud storage
* **Organisational Measures** – Staff training, data protection policies, regular audits to ensure compliance

We only retain Members, Trustees and Local Governors data for as long as necessary in line with our **Records Management Policy**, which follows guidance from the **Information and Records Management Society (IRMS) Schools Toolkit**.

**6. Who We Share Members, Trustees and Local Governors Data With**

We only share Members, Trustees and Local Governors data when it is lawful and necessary, including with:

* **Department for Education (DfE)** – To meet statutory governance reporting requirements
* **Education and Skills Funding Agency (ESFA)** – For financial oversight and compliance with academy trust regulations
* **Companies House** – To register and update trustee and governance details where required
* **Disclosure and Barring Service (DBS)** – Where safeguarding checks are required
* **Local Authorities** – For governance support, safeguarding, and statutory duties
* **Law Enforcement Agencies** – If required for legal compliance or safeguarding concerns
* **School Service Providers** – Such as IT systems used for governance record-keeping and communication
* **Public Registers and Websites** – Where required by law, such as governance details published on the school and MAT websites

All third parties we share data with must comply with strict data protection agreements.

**7. International Data Transfers**

We do not routinely transfer Members, Trustees and Local Governors data outside the UK. If we do, we ensure appropriate safeguards are in place, such as **UK adequacy decisions** or **Standard Contractual Clauses (SCCs)**.

**8. Members, Trustees and Local Governors Rights**

Under UK GDPR, Members, Trustees and Local Governors have the following rights regarding personal data:

* **Right to Be Informed** – About how we use their data
* **Right of Access** – To request a copy of their personal data
* **Right to Rectification** – To correct inaccurate or incomplete data
* **Right to Erasure ("Right to Be Forgotten")** – In certain circumstances, to request data deletion
* **Right to Restrict Processing** – To limit how data is used
* **Right to Data Portability** – To request data in a transferable format (where applicable)
* **Right to Object** – To processing based on legitimate interests
* **Rights Related to Automated Decision-Making** – We do not use Members, Trustees and Local Governors data for automated decisions

To exercise any of these rights, please contact the Data Protection Officer (DPO) (details below).

**9. Contact Details**

For any questions about this privacy statement or to exercise your rights, please contact:

**S Smith Information Governance Officer and Data Protection Officer**on behalf of Three Counties Academy Trust  
Herefordshire Council, Plough Lane, Hereford, HR4 0LE  
Email: samsmith@herefordshire.gov.uk  
Tel: 01432 260282

If you have concerns about how your data is handled, you can also contact the **Information Commissioner’s Office (ICO):**

**ICO Website:** [**www.ico.org.uk**](https://www.ico.org.uk) **ICO Helpline:** 0303 123 1113

**10. Changes to This Privacy Statement**

We may update this privacy statement from time to time. Any significant changes will be communicated via our website and school communications.