

Privacy Notice

(How we use governance information)



Policy Review Schedule

Policy	OLT Privacy Notice (Governors)
Review schedule	Every 2 years (or when legislative change takes place)
Statutory Policy	Yes
Policy owner	CEO
Lead Reviewer	HOO (external review needed if change in legislation)
Approver and date of last approval	CEO 19 th June 2026
Key review dates	
Changes made	
September 2022	Written
September 2024	Section on automated decision making and profiling added. Section on filtering and monitoring added.
June 2026	Reviewed and updated for compliance and reference to latest legislative framework. Added details of procedure for complaints about data protection and personal data
Next review June 2028	

Why do we collect and use governors' information? (Lawful basis for processing)

Under the UK GDPR and the Data Protection Act 2018, the lawful basis/bases we rely on for processing personal information for general purposes are:

For establishing and maintaining effective governance, we rely on Article 6(1)(e) of the UK GDPR, where processing is necessary for a task in the public interest or in the exercise of official authority; for statutory publishing, sharing and required suitability checks, we rely on Article 6(1)(c), where processing is necessary to comply with a legal obligation, and Article 6(1)(e) where applicable.

The categories of governance information that we collect, hold and share include:

- Personal identifiers, contacts and characteristics (such as name, date of birth, contact details and postcode)
- Governance details (such as role, start and end dates and governor ID)
- Qualifications
- Register of interests
- Contact details
- References
- Evidence of qualifications
- Employment details

- Where information is not collected directly from you, it may be provided by referees, recruitment or appointment panels, other education establishments, the Department for Education or the local authority, as relevant to the governance role.

Collecting governance information

The personal data collected is essential, in order for the school/Trust to fulfil their official functions and meet legal requirements.

We collect and use governance information, for the following purposes:

- Establish and maintain effective governance
- Meet statutory obligations for publishing and sharing governor's details
- Where safe recruitment or suitability checks include criminal offence information, such as DBS or disqualification information, we process it only where required or permitted by law for safeguarding purposes, restrict access, and keep it only for as long as necessary.

All Academy Trusts under the Academy Trust Handbook have a legal duty to provide governance information as detailed above.

Governance roles data needed for statutory governance records, publication requirements, GIAS returns and safeguarding or suitability checks is mandatory; information requested only for non-statutory purposes will be identified as voluntary. If mandatory information is not provided, we may be unable to appoint you to, or maintain, the relevant governance role. 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.

Automated decision making and profiling

We do not currently process any governors' or 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, including the right to object.

Use of personal data for filtering and monitoring purposes

The school/Trust may monitor Governors' use of information and communications systems, equipment and facilities when Governors use them on school premises, including network logs, internet access records and device activity, where this is necessary and proportionate. Access to monitoring information is restricted to authorised staff and information is retained only for as long as needed. This is so that all visitors:

- Comply with health and safety and other legal obligations.
- Comply with all relevant policies (including Child Protection ICT/Acceptable Use) and all legal obligations.
- Keep networks and devices safe from unauthorised access, and prevent malicious software from harming IT networks.

Storing data

We hold data securely in line with the Trust retention schedule, based on IRMS data retention guidance, for the periods needed for statutory, safeguarding, governance and audit purposes. A copy can be found on the Trust website www.omnialearningtrust.org.

Who do we share governance information with?

We routinely share information with:

- Our local authority (where applicable)

- The school/Trust website and other public governance information pages, where publication is required

Why we share governance information

We do not share information about individuals in governance roles with anyone without consent unless we have a legal obligation, a public task, a safeguarding reason or another lawful basis to do so.

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

To find out more about the requirements placed on us by the Department for Education (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 Department for Education (DfE) and education establishment users with a Department for Education (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 for Education (DfE) unless the law allows it.

Data collection requirements:

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 current government security policy framework.

The governance data that we lawfully share with the Department for Education (DfE) via GIAS will:

- Increase the transparency of governance arrangements.
- Enable local authority maintained schools, academies, academy trusts and the Department for Education (DfE) 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 (DfE) 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.

Requesting access to your personal data – held by the school/Trust

Under data protection legislation, governors have the right to request access to information about them that we hold. To make a request for your personal information contact Sarah Bellingham, Data Protection Officer. We respectfully request that you request information during term time to give the academy the best opportunity to comply with your request within one calendar month although you are under no legal obligation to do so.

You also have the right to:

- To ask us for access to information about you that we hold.
- To have your personal data rectified, if it is inaccurate or incomplete.
- To request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- To restrict our processing of your personal data (i.e. permitting its storage but no further processing).

- To object, on grounds relating to your particular situation, to processing based on public task, and 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 you.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance by following the complaints procedure below, or you can raise this directly with the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Requesting access to your personal data – held by the DfE

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'. 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>

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>

Withdrawal of consent

Where we ask for consent for a specific optional use of your personal data, you have the right to withdraw that consent at any time. If you change your mind, or are unhappy with our use of your personal data, please let us know by contacting Sarah Bellingham (Data Protection Officer).

Complaints related to personal data or data protection

The Trust takes the protection of personal data seriously and is committed to complying with UK data protection legislation. Individuals who have concerns about the way the Trust has collected, used, shared, retained or otherwise processed their personal information may raise those concerns in line with the procedure set out below. The same procedure is also set out in the OLT Data Protection Policy and the OLT Complaints Policy.

Examples of data protection concerns may include, but are not limited to:

- The accuracy of personal information held by the Trust;
- The disclosure of personal information to another person or organisation;
- The security of personal information;
- Delays or concerns relating to the handling of information rights requests;
- Concerns regarding the lawful basis for processing personal information;
- The retention or deletion of personal information.

Where a complaint relates wholly or partly to data protection matters, the complaint may be referred to the Trust's Data Protection Officer (DPO) or another appropriately authorised officer to assist with

the investigation and response. The Trust will investigate data protection complaints in accordance with the timescales set out below, and will seek to resolve concerns at the earliest opportunity.

Requirement	Omnia approach
How to complain	Directly to DPO email, via admin@omnialearningtrust.org
Acknowledgement	Within 30 calendar days
Investigation	By DPO and/or appropriate senior leader
Outcome	Written response explaining findings and actions
Escalation	To ICO (details provided in outcome letter and below)

Where a complainant remains dissatisfied following completion of the Trust's complaints procedure, they may refer the matter to the Information Commissioner's Office (ICO), the UK's independent authority for data protection matters.

[Information Commissioner's Office \(ICO\)](#)

Website: www.ico.org.uk

Telephone: 0303 123 1113

Nothing in this procedure affects an individual's statutory rights under data protection legislation or their right to raise concerns directly with the ICO at any time.

Contact:

The data controller for this privacy notice is Omnia Learning Trust; if you would like to discuss anything in this privacy notice, please contact:

- Sarah Bellingham, Data Protection Officer, admin@omnialearningtrust.org