



## Privacy Notice

Members, Trustees and Academy  
Community Council (ACC) Members

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## 1. Privacy Notice – (How we use information)

- 1.1. In order to enable us to run the Trust and to help our academies improve outcomes for children and young people, the Co-op Academies Trust collects and uses information about our Members, Trustees and Community Council Members (CCMs). This is known as “personal data” and individuals have rights around their personal data, including knowing how and why we are processing the data.
- 1.2. “Processing” data means anything we do with that information, including collecting, storing, using, sharing it and disposing of it.
- 1.3. For the purposes of Data Protection legislation the Co-op Academies Trust is a ‘data controller’, and is registered as such with the Information Commissioner’s Office.

## 2. What Information do we collect and use about our Members, Trustees and CCMs?

- 2.1. We collect many different categories of information, for example:
  - Personal details (name and date of birth)
  - Contact details (address, email address, telephone number)
  - Professional details (place of work, profession)
  - Relevant business and pecuniary interests details
  - Role application details
  - Selection records
  - References
  - Identity verification records
  - Checks made regarding online presence including social media searches
  - Governance details (role, start date, end date, term of office)
  - Meeting attendance records
  - Records of communications
  - Records of visits to academies
  - Photographs and 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, and the contributions you have made.

- 2.2. We may also collect, use and store information about criminal convictions, offences and prohibitions. This information may have come from other organisations including former employers, Teacher Regulation Agency, social services and the Disclosure and Barring Service.
- 2.3. We also are required to collect and use information that is given additional protection under the UK General Data Protection Regulation (UK GDPR), for example:
- Demographic information required for monitoring equal opportunities
  - Information about medical or health conditions, that we need to know about, including information about disabilities for which we need to make reasonable adjustments<sup>1</sup>

### 3. Why we collect and use this information

- 3.1. The personal data collected is essential, in order for the Trust to fulfil its official functions and meet legal requirements.
- 3.2. We use the information for some, or all, of the reasons below:
- To meet the statutory duties placed upon us
  - To facilitate safer recruitment
  - To help us deliver our responsibilities to our communities
  - To enable you to work with us
  - To maintain a safe environment for our pupils
  - To enable you to take part in appropriate training and professional development
  - To comply with our legal obligations to share information
  - To ensure your health and safety
  - To allow us to communicate with you
  - To inform our parents, colleagues and other stakeholders of the individuals responsible for the governance of our academies
  - To keep you up to date with news about the Trust and its academies
- 3.3. We process photographic images for identification purposes (safeguarding and identifying those responsible for governance, to our

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<sup>1</sup> Please refer to our Special Category Data Policy for full details of the lawful bases for processing this type of data

parents and pupils), and celebration purposes (to record Trust and academy events).

## 4. The legal basis for using this information

4.1. Depending on the purpose, our legal use of your information will be 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 [Article 6(1)(c)]  
for example: providing information to the Department for Education (DfE)
- To protect the vital interests of you or someone else [Article 6(1)(d)]  
for example: giving your contact details to the emergency services
- Delivering a public task [Article 6(1)(b)]  
for example: keeping records of your attendance at Board or ACC meetings

4.2. The ways we collect and use *sensitive* information about our Members, Trustees and members of our Academy Community Councils are lawful based on:

- your explicit consent;
- compliance with certain legal obligations, or for exercising certain legal rights;
- for protecting your vital interests in an emergency;
- for health and public health reasons; or
- for carrying out tasks that are in the substantial public interest including for safeguarding purposes.

### 4.3. Marketing purposes

4.3.1. Where you have given us consent to do so, we may send you marketing information by text message or email promoting Trust and academy events, campaigns and or charities. You can withdraw this consent at any time by contacting us (see the [Contacts](#) section).

### 4.4. Automated decision making & profiling

4.4.1. We do not currently process any personal data through automated decision making or profiling. Should this change in

the future, privacy notices will be updated to explain both the processing and your right to object to it.

## 5. How we collect your personal information

5.1. We collect personal information in a variety of ways. For example, data is collected through:

- application forms
- your passport, driving licence, or other identity documents
- forms completed by you at the start of or during your term of office
- correspondence with you
- interviews
- meetings or other assessments
- images provided by you or taken using school photographic equipment
- local authorities
- the NHS
- the Police
- the Disclosure and Barring Service and
- the Department for Education

5.2. Governance data is essential for the Trust's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it may be requested on a voluntary basis. 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.

## 6. How, where and for how long we store Trustees', Members' and CCMs' information

6.1. Some of the personal data that we collect, and use, is stored in the Trust's Google Workspace. Google Workspace is a cloud-based platform with personal data being held on Google servers.

6.2. Other data, depending on its purpose will be kept in other systems, such as GovernorHub (our cloud based governance portal), or in manual files.

6.3. Secure storage is provided for paper based records.

- 6.4. We also use email to enable authorised users to transfer information to one another.
- 6.5. We only keep the information for the length of time we need it for, as shown in our data retention schedule. For more information on our data retention schedule, please visit our data retention policy [here](#).
- 6.6. We dispose of personal information securely when we no longer need it.

## 7. Sharing your personal data

7.1. We routinely share this information with:

- The relevant Local Authority
- The Department for Education (including the Teaching Regulation Agency)
- Other Members, Trustees or members of the Academy Community Councils
- The Disclosure and Barring Service
- Our staff
- Our communities (i.e. via the website)
- Police forces and Courts
- Our suppliers and service providers. For example, and not limited to GovernorHub (our cloud based governance portal) and the National Governance Association (for advice, support and guidance)

## 8. Sharing information

We do not share information about our Members, Trustees or CCMs with anyone without consent, unless the law and our policies allow us to do so.

### 8.1. Local Authority

- 8.1.1. Where we are required to share information about governance with our Local Authority we do so under the terms of a Data Sharing Agreement.

### 8.2. Department for Education

- 8.2.1. 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), under the requirements set out in the Academies Financial Handbook

- 8.2.2. All data is entered manually on the GIAS (Get Information About Schools) system and held by the DfE under a combination of software and hardware controls which meet the current government security policy framework.
- 8.2.3. To find out more about the data collection requirements placed on us by the Government and the Department for Education including the data that we share with them, go to [www.gov.uk/government/news/national-database-of-governors](http://www.gov.uk/government/news/national-database-of-governors).
- 8.2.4. The governance data that we lawfully share with the DfE via Get Information About Schools ( <https://get-information-schools.service.gov.uk/> ):
  - will increase the transparency of governance arrangements
  - will enable ourselves 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.
- 8.2.5. Note: Some of these personal data items are not publicly available and are encrypted within the GIAS system. Access is restricted to a small number of DfE staff 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 law allows it.

## 9. Freedom of Information Act 2000 and Environmental Information Regulations 2004

- 9.1. As a public body, our Trust is subject to requests made under the above legislation. Therefore, we have a legal obligation to process any personal data we hold when considering requests under these laws. For example, we may receive a request asking about numbers and/or roles of CCMs. However, we will never disclose personal data in our responses to these requests where to do so would contravene the principles of data protection.



## 10. Requesting access to your personal data

- 10.1. 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 Head of Data Protection via the [contact details below](#).
- 10.2. You also have the right to:
  - be informed about the collection and use of your personal data;
  - rectification, ie to have inaccurate personal data rectified, or completed if it is incomplete;
  - erasure, often known as the 'right to be forgotten'; however this does not apply where, amongst other things, processing is necessary to comply with a legal obligation;
  - restrict processing, although, as above this is a limited right;
  - object; though other than for marketing purposes, this is also limited as above.
- 10.3. Where we rely on your consent to process your data, you have the right to revoke that consent. If you do change your mind, or you are unhappy with our use of your personal data, please [let us know](#).
- 10.4. You also have rights in relation to automated decision making and profiling, though these are not currently relevant.
- 10.5. Finally, you have the right to seek redress, either through the Information Commissioner's Office (ICO), or through the courts.
- 10.6. If you make a request, we will keep a record of the request and any personal data supplied for a suitable period after its fulfilment, in order to deal with any questions you, your representatives or regulators may have about it.

## 11. Who to contact

- 11.1. If you have a concern about the way we are collecting or using your personal data or you would like to discuss anything in this privacy notice, we ask that you raise your concern with us in the first instance, by contacting the Head of Governance and Company Secretary (Sarah Lay, [sarah.lay@coopacademies.co.uk](mailto:sarah.lay@coopacademies.co.uk), 07879 487266), or the Trust's Head of Data Protection (Tammy Pyszky, [data@coopacademies.co.uk](mailto:data@coopacademies.co.uk), 07815 654419).

- 11.2. If you are dissatisfied with our response to your concerns you can contact the ICO (contact details below) quoting our ICO registration number ZA201403 and stating that the Data Controller is The Co-op Academies Trust.

Information Commissioners' Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
0303 123 1113  
Website: <https://ico.org.uk/concerns/>

## 12. Updates to this privacy notice

- 12.1. 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 in October 2024 and it will be reviewed at least annually, or more frequently when significant changes are made to the law.