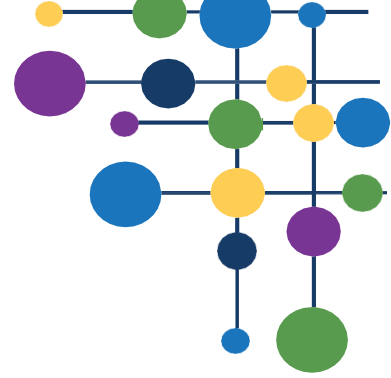


# MEMBERS, DIRECTORS AND GOVERNORS PRIVACY NOTICE FOR USE WITHIN THE TRUST

Version	2.0
Name of policy writer	Jayne Newson
Date of last review	6 <sup>th</sup> February 2025
Next review date	June 2027
Approved by Directors or Delegated Authority	1 <sup>st</sup> June 2026





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## Introduction

SHARE Multi-Academy Trust, whose registered office is at Shelley College, Huddersfield Road, Shelley, Huddersfield HD8 8NL is the data controller for the use of personal data in this privacy notice.

The trust is registered with the ICO under registration number ZA479462.

The trust has a Data Protection Officer whose contact details are set out below:

Jayne Newson – Data Protection Officer

Email: [jayne.newson@sharemat.co.uk](mailto:jayne.newson@sharemat.co.uk)

Tel: 01484 955007

By post to:

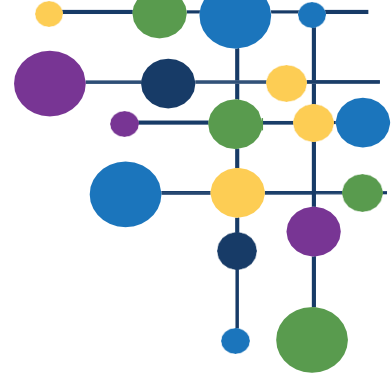
Mrs J Newson  
 Data Protection Officer  
 Heaton Avenue, A SHARE Primary Academy  
 South Parade  
 Cleckheaton  
 West Yorkshire  
 BD19 3AE

This privacy notice advises members, trustees and local academy governors of the trust’s data protection responsibilities on the collection and processing of their personal information.

We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations. The trust processes personal data in accordance with UK GDPR, the Data Protection Act 2018, and other applicable UK data protection legislation, including relevant provisions under the Data (Use and Access) Act 2025.

We are required to explain how and why we collect such data and what we do with that information. This notice will also provide information about your personal information that is held and processed by us.





## The categories of governance information that we process

The categories of governance information that we process include:

- personal identifiers, contacts and characteristics (such as name, address, date of birth, contact details and postcode)
- governance details (such as role, start and end dates, governor ID and trust email address)
- permitted details of recruitment checks (such as DBS number, Section 128 check, identity check, information about a criminal record, further appropriate checks if you are living or have lived overseas)
- Images, video and audio (such as recording taken of meetings and images taken for ID badges, website and newsletters).

This list is not exhaustive.

Where processing is likely to result in a high risk to individuals' rights and freedoms, the trust carries out Data Protection Impact Assessments (DPIAs).

All third party processors handling personal data on behalf of the trust are subject to contractual data protection obligations.

## Why we collect and use governance information

The personal data collected is essential in order for the trust and its schools to fulfil their official functions and meet legal requirements.

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

- to meet the statutory duties placed upon us
- to facilitate safe recruitment of members, trustees and governors
- to inform our community.

Under the UK General Data Protection Regulation (UK GDPR), the legal bases we rely on for processing personal information for general purposes are:

- for the purpose (a) named above in accordance with the legal bases of legal obligation
- for the purpose of (b) in accordance with the legal basis of legal obligation: collecting and holding criminal record checks
- for the purpose of (c) in accordance with the legal basis of consent: to use your personal data such as your image on our website and in publications to inform our community of the work of trustees and governors
- Academy trusts, under the '[Academy Trust handbook](#)', have a legal duty to provide the governance information as detailed above.

Some information we process is considered more sensitive under data protection law, such as criminal records information and safeguarding-related checks. We only use this information where the law allows us to do so and where it is necessary to meet our legal obligations and governance responsibilities.

Where CCTV operates on trust or school sites for safety, security and crime prevention purposes, images of members, directors and governors may be captured. Access to footage is restricted to authorised personnel.

## Collecting governance information





We may collect your personal information in a variety of ways. For example, data might be collected through:

- Governor election nomination forms, application forms and onboarding documents
- Your passport or other identity check documents, such as your driving licence
- From third parties such as the Disclosure and Barring Service (DBS) in carrying out safeguarding checks
- Information provided and recorded in the register of directors.

Governance data is essential for the trust and its schools' 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.

### **Storing governance information**

We take the security of personal data very seriously. Data is stored in the UK/Ireland, however some service providers may process limited personal data outside the UK. Where this occurs, appropriate safeguards are applied in accordance with UK GDPR. We have internal policies and controls in place to try to ensure that data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties.

Where we engage third parties to process personal data on our behalf, they do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

We hold data securely for the set amount of time shown in our data retention schedule which is aligned with the IRMS Management Toolkit. For more information on our data retention schedule and how we keep your data safe, please visit our data protection policies available on SHARE Multi-Academy Trust's website.

### **Who we share governance information with**

We routinely share this information with:

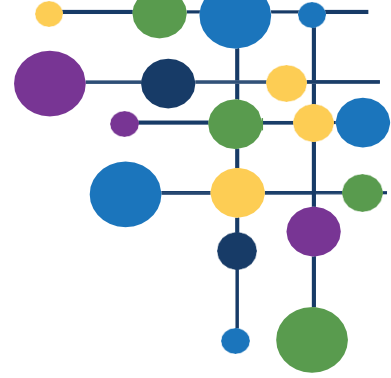
- the Department for Education (DfE)
- the local authority
- SHARE Multi-Academy Trust
- National Governance Association (NGA)
- Companies House
- GovernorHub
- Confederation of Schools Trust (CST).

We share information with the above in order to carry out our public task of running the trust and its schools safely and effectively and to meet our legal obligations.

### **Why we share governance information**

We do not share information about individuals in governance roles with anyone without consent unless the law and our policies allow us to do so. Personal data is transferred using secure methods





such as encryption.

We share governance data with the DfE on a statutory basis.

In addition, we have contracts with third parties for services such as GovernorHub, CST and the NGA or as part of cloud-based storage applications for the purpose of securely holding and protecting your data. Contracts such as these help us to run our schools efficiently. Before entering into a contract, we ensure that adequate policies and security measures are in place.

## Department for Education

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 (DfE) under the requirements set out in the [Academies Financial Handbook: Academy Trust Handbook](#)

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

## How the government uses your data

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

- Increase the transparency of governance arrangements
- Enable schools and the DfE to quickly and accurately identify individuals who are involved in governance and who govern in more than one context
- Allow the 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.

You can find out more about the requirements placed on the school by the DfE, including the data we share with them, via this website: <https://www.gov.uk/government/news/national-database-of-governors><https://www.gov.uk/government/news/national-database-of-governors>

Some of this personal data is not publicly available and is 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 to fulfil their official duties. The information is for internal purposes only and is not shared beyond the DfE, unless the law allows it to be.

Under the Data Protection Act 2018, you are entitled to ask the DfE what personal information it holds about you. You have the right to ask the DfE:

- If it processes your personal data
- For a description of the data it holds about you
- The reasons it is holding your data and any recipient it may be disclosed to
- For a copy of your personal data and any details of its source.

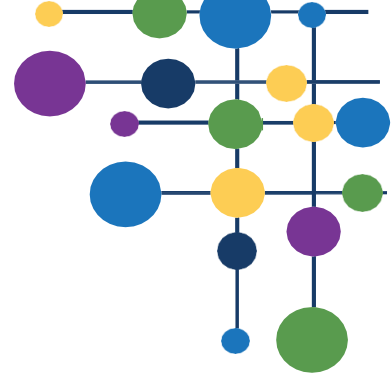
To exercise these rights, you should make a subject access request. Information on how to do this can be found by following this link:

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

You can also contact the DfE directly using its online contact form by following this link: <https://www.gov.uk/contact-dfe>

## The use of Artificial Intelligence (AI)





The trust may use approved AI tools to support administrative and governance activities. AI tools are not used to make solely automated decisions about members, directors or governors. Any use of AI involving personal data is subject to human oversight, security controls and data protection safeguards. The trust currently uses Microsoft 365 Copilot within its secure Microsoft environment.

Further information about the use of AI can be found in the SHARE MAT Artificial Intelligence Policy & Procedure.

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

Under UK GDPR, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the trust's Data Protection Officer, whose contact details are set out at the beginning of this privacy notice.

You also have the right to:

- Request access to the information the trust or school holds about you
- Restrict the processing of your personal information, e.g. consenting to it being stored but restricting it being processed any further
- Object to and prevent processing for the purpose of direct marketing and processing for the purpose of scientific or historical research and statistics
- Object to decisions being taken by automated means
- Have inaccurate or incomplete personal data rectified, blocked, erased or destroyed
- Not be subjected to decisions based purely on automated processing where it produces a legal or similarly significant effect on you
- To request the deletion or removal of personal data where there is no compelling reason for the continued processing.

We will normally respond to information rights requests within one calendar month.

### **The right to raise concerns, complaints or withdrawal of consent**

If you have any concerns about the way we collect or process your data or you would like to discuss anything in this privacy notice, please contact the Data Protection Officer in the first instance.

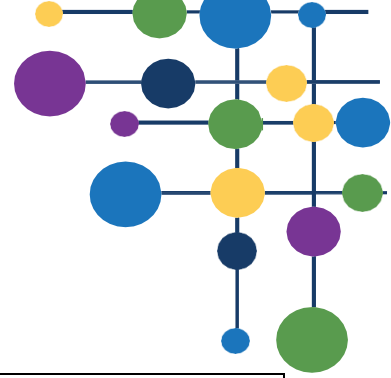
You can also contact the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns>. The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

Where we are processing your personal data with your consent, you have the right to withdraw that consent. This only applies where consent is the lawful basis and does not affect statutory processing.

If you require further information about how we and/or the DfE store and use your personal data, please visit our [website](#) where you can find the latest version of our Data Protection Policy, or the Gov.UK website, (<https://www.gov.uk/guidance/data-protectionhow-we-collect-and-share-research-data>).

If you require this privacy notice in an alternative format, please contact the Data Protection Officer.





## Schedule of Amendment

Version	Amendment
1.0	New version
2.0	Strengthened the document in terms of AI governance, CCTV transparency, international transfers and DUAA 2025 awareness and technical wording amended to be more reader friendly

