



GOVERNANCE PRIVACY NOTICE

This notices applies to all Members, Trustees and Governors within the
Bonitas Multi-Academy Trust

Date last reviewed	Summer 2025
Review period	Every 3 years
Owner	CEO / Head of IT
Approved by	Board of Trustees
Date approved	June 2025
Date of next review	Summer 2028
Associated documents / information	Data Retention Policy

1. Introduction

Bonitas Trust ("the Trust") is committed to safeguarding the personal data of its appointees. This notice outlines how the Trust collects, uses, and protects your personal information throughout the duration of your appointment and after your term has concluded.

Please read this Notice carefully and raise any questions you may have with the Head of Estates and IT or CEO.

2. Scope

The Trust has appointed a Trust Data Protection lead and an external Data Protection Officer to oversee compliance with this Notice and to deal with any questions or concerns. If you would like further information about the matters set out in this Notice, please contact:

The Trust Data Protection Lead: Email: ithelpdesk@bonitas.org.uk

The external Data Protection Officer: Email: office@turniton.co.uk

3. The categories of Governance information that we process include:

Personal data refers to any information that identifies you and relates to you as an individual. As a Governor, Trustee, or Member of the Trust, we collect, use, and store your personal data for various purposes connected to your governance role and responsibilities.

Below are the main categories of personal data that we routinely process in relation to Governors, Trustees, and Members:

- Contact details (e.g., name, address, email, and telephone number)
- Date of birth
- Nationality and right to work in the UK
- Previous names
- ID documents and data required for ID verification
- Governance and professional experience (Skills Audit)
- Governance details (such as role, start and end dates and ID)
- Declarations of interest
- Attendance records at meetings
- Criminal records check (DBS) outcomes where applicable
- Records of training and development
- Photos for use on the website and on school noticed boards

4. Why we collect and use Governance information

The personal data we collect is essential for the school or Trust to carry out its official functions and comply with legal obligations.

We collect and process governance-related information for the following purposes:

- a. **To fulfil statutory duties** related to school and Trust governance, including safeguarding requirements and compliance with financial regulations – *(Legal Obligation)*
- b. **To communicate with you** in your role as a Governor, Trustee, or Member – *(Task carried out in the Public Interest)*
- c. **To maintain records** of attendance at governance meetings – *(Task carried out in the Public Interest)*
- d. **To maintain records** of training and development undertaken by Governors, Trustees, or Members – *(Task carried out in the Public Interest)*
- e. **To provide a public record** of Governors, Trustees, and Members, including declarations of business and financial interests – *(Task carried out in the Public Interest)*

Legal Basis for Processing

Under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, the legal bases we rely on for processing your personal information are:

- For purpose (a): **Legal Obligation**
- For purposes (b) to (e): **Public Task** – necessary for the performance of a task carried out in the public interest or in the exercise of official authority

A full list of the lawful bases on which we process this information is given in section 16.

Where you have provided consent for us to process your personal data, you have the right to withdraw that consent at any time. We will make this clear when we are requesting your consent and explain how you can withdraw it should you choose to do so.

Withdrawing consent will not affect the lawfulness of any processing carried out before your consent was withdrawn.

5. Collecting Governance information

We collect personal information via the application process and declaration forms, sent by the clerk to new governors/trustees/members. This information is checked annually. Some data is entered directly onto our governor portal for all Governance documents, whilst other information is collected by the clerk via email. HR information may be sent directly to the appropriate school. The clerk may request additional information by email or other means as required to fulfil official functions and meet legal requirements.

Governance roles data is essential for the school'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. Storing Governance information

We hold data securely for the set amount of time shown in our data retention schedule on the school network or on SharePoint. Each system has appropriate access controls in place so that data can only be accessed by employees who need to use it as part of their official duties.

Copies of DBS supporting documents will be shredded immediately after the applicable checks have been completed subject to any exceptional circumstances and/or to comply with particular laws or regulations, although the outcome of any check will remain on the Governor / Trustee's record.

Additional personal information collected for specific purposes will only be held for as long as necessary to fulfil that purpose, after which it will be securely deleted or destroyed.

For more information on our data retention schedule and how we keep your data safe, please see our Data Retention Policy.

7. Why we share Governance information

We routinely share information about individuals in governance roles with:

- The local authority (where applicable)
- The Department for Education (DfE)
- The Trust and school websites
- School notice boards
- School documents
- Other schools or academies within the Trust

We do not share personal information with third parties without your consent unless there is a legal obligation to do so or it is permitted under our policies.

8. Department for Education

The Department for Education (DfE) collects personal data from educational settings, including academy trusts and local authorities. We are legally required to share certain information about individuals in governance roles with the DfE in accordance with the Academy Trust Handbook.

This data is manually entered into the Get Information About Schools (GIAS) system and is stored by the DfE using a combination of software and hardware security measures that comply with the current Government Security Policy Framework.

For more details, please refer to the section below titled “How Government Uses Your Data.”

9. Companies House

As part of our legal obligations as an Academy Trust, we are required to share certain governance information with Companies House. This includes details about individuals in governance roles as Trustees, as mandated by the Companies Act 2006.

The information shared with Companies House is publicly available and may include names, positions, and relevant declarations, such as conflicts of interest or directorships in other companies.

For further information, please visit the Companies House website:

www.gov.uk/government/organisations/companies-house.

10. Requesting access to your personal data

Under data protection legislation, you have the right to request access to personal information that we hold about you. **To make such a request, please contact [XX].**

You also have the right to:

- Ask us for access to information we hold about you
- Have your personal data rectified if it is inaccurate or incomplete
- Request the deletion or removal of your personal data where there is no compelling reason for its continued processing
- Restrict our processing of your personal data (i.e. permit its storage but not process it further)
- Object to the processing of your personal data for direct marketing (including profiling) and for the purposes of scientific or historical research and statistics.
- Not be subject to decisions based solely on automated processing where it produces a legal or similarly significant effect on you.

If you have a concern or complaint about how we are collecting or using your personal data, please raise it with us first. Alternatively, you can contact the Information Commissioner's Office (ICO) directly at: <https://ico.org.uk/concerns/>.

For more information on how to request access to personal information held centrally by the DfE, please refer to the "How Government Uses Your Data" section of this notice.

11. Last updated

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time.

12. How Government uses your data

The Governance data that we lawfully share with the DfE via GIAS will be used to:

- Increase the transparency of governance arrangements across schools and the Trust.
- Enable maintained schools, academies, academy trusts, and the DfE to identify individuals involved in governance roles, including those serving in more than one governance context.
- Allow the DfE to uniquely identify individuals and, in a small number of cases, conduct checks to confirm their suitability for such an important and influential role.

13. Data collection requirements

To learn more about the requirements placed on us by the Department for Education

(DfE), including the types of data we share, please visit:
<https://www.gov.uk/government/news/national-database-of-governors>

Some personal data shared with the DfE is not publicly available and is encrypted within the GIAS system. Access to this data is restricted to authorised DfE users and other education establishment users who hold a DfE Sign-in account and need the data to perform their official duties.

This information is used for internal purposes only and will not be shared outside the department unless required by law.

14. How to find out what personal information DfE hold about you

Under the Data Protection Act 2018, you have the right to ask the DfE:

- Whether they are processing your personal data
- What personal data they hold about you
- Why they are holding it and who it may be shared with
- For a copy of your personal data and its source

To access this information, you should submit a Subject Access Request (SAR). Guidance on how to do this is available in the DfE's Personal Information Charter

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

To contact the DfE directly, visit: <https://www.gov.uk/contact-dfe>

15. The lawful basis on which we process this information

We collect and process your information:

- Under Article 6 of the UK General Data Protection Regulation (UK GDPR), we process personal data on the lawful basis of public task as is necessary for us to carry out our official functions as a school. This includes fulfilling statutory duties such as completing Departmental Censuses under the Education Act 1996, promoting equal opportunities, protecting the welfare of children through safeguarding measures, and carrying out other responsibilities that are authorised or required by law.
- In accordance with the **Vital Interests basis**, we will use personal data including known medical data in a life-or-death situation;
- Where it is carried out as a task in the public interest, such as equal opportunities monitoring, for child protection purposes or where otherwise authorised by law, such as Departmental Censuses as required in the Education Act 1996.
- In accordance with the **Contract basis** - if we need to process the data to fulfil a contract with you or to assist you in entering into a contract with us;
- In accordance with the **Consent basis**- we will obtain consent from you to process your personal data for a specific purpose;
- In accordance with the **Legitimate Interest** basis, where there is minimal privacy impact, and we have a compelling reason;
- To facilitate your attendance in schools, background checks from the Disclosure

and Barring Service may be done which may involve the collection of criminal convictions;

- In accordance with the **Legal Obligation basis**, where we need to process the data to comply with certain laws.;
- Governance Data: All local authority-maintained school governing bodies, under Section 538 of the Education Act 1996, and academy trusts, under the requirements of the Academy Trust Handbook, have a legal duty to provide and maintain accurate governance information as outlined above.

Under Article 9 of the UK GDPR, where we process special category data (e.g. health or ethnicity), we do so when necessary for reasons of substantial public interest or to provide health or social care, in line with our duties as a school. We may also process special category data in the following circumstances:

- Where we have obtained your explicit consent to use your data in a specific way;
- When we need to perform or exercise an obligation or right in relation to employment, social security, or social protection law;
- When we need to protect an individual's vital interests, for example, in life-threatening situations where you are physically or legally incapable of giving consent;
- Where the data has already been made manifestly public by you;
- When we need to process it for the establishment, exercise, or defence of legal claims;
- Where processing is necessary for reasons of substantial public interest, as defined in relevant legislation;
- When processing is necessary for health or social care purposes, and the processing is carried out by or under the direction of a health or social care professional, or any other person bound by confidentiality under law;
- When processing is necessary for public health reasons, and the processing is carried out by or under the direction of a health or social care professional, or any other person bound by confidentiality under law;
- Where processing is necessary for archiving purposes, scientific or historical research, or for statistical purposes, and the processing is in the public interest