



# Compass Academy Trust

## **Privacy Notice for Compass Academy School and Trust Governance Roles (including how we use personal information on Get Information about Schools (GIAS))**

**Compass Academy Trust is the Data Controller for the purposes of data protection law.**

Under data protection law, individuals have a right to be informed about how the Trust uses any personal data we hold about them. We comply with this right by providing 'privacy notices' to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals undertaking a governance role with Compass Academy Trust and our schools.

Our data protection officer is Karen Wilson (see 'Contact us' below).

### **The categories of governance information that we process include:**

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Personal identifier, contacts and characteristics (such as name, date of birth, contact details and address)
- References
- Evidence of qualifications
- Employment details
- Information about business and pecuniary interests
- Governance details (such as role, start and end dates for term of office)

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This may include information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Disability and access requirements

### **Why we collect governance information**

The purpose of processing this data is to support the Trust and our schools to:

- Establish and maintain effective governance
- Meet statutory obligations for publishing and sharing trustee's/governor's details including but not limited to the Get Information about Schools service
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Undertake equalities monitoring
- Ensure that appropriate access arrangements can be provided for volunteers who require them

Under the UK General Data Protection Regulation (GDPR) 2018, the legal basis we rely on for processing personal information for general purposes are:

- Comply with a **legal** obligation
- Carry out a task in the **public** interest

Less commonly, concerning any special category data we may also use personal information about you where:

- You have given us **consent** to use it in a certain way
- We need to protect your **vital** interests (or someone else's interests)
- It is in the **legitimate interests** of the Trust

Under the Academy Trust Handbook, academy trusts have a legal duty to provide the governance information as detailed above.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify our use of your data.

### **Collecting Governance information**

We collect personal information via governor/Trustee appointment forms.

Governance roles 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.

### **How we store governance information**

Personal data is stored in accordance with our Data Protection Policy and data retention schedule. We maintain a file to store personal information. The information contained in this file is kept secure and is only used for purposes directly relevant to your role with the Trust.

When your relationship with the Trust has ended, we will retain and dispose of your personal information in accordance with the Trust's data retention schedule.

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

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- Government departments or agencies – to meet our **legal obligations** to share information about trustees/governors
- Our local authority – to meet our **statutory** duties
- Suppliers and service providers – to enable them to provide the service we have **contracted** them for, such as trustee/governor support
- Professional advisers and consultants
- Employment and recruitment agencies
- Police forces, courts

## **Department of Education**

The Department for Education (DfE) collects personal data from educational providers 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 [Academy Trust Handbook](#).

### **Use of your personal information for marketing purposes**

Where you have given us consent to do so, the trust may send you marketing information by e-mail or text promoting trust events, charitable causes or services that may be of interest to you. You can "opt out" of receiving these texts and/or e-mails at any time by contacting the trust central team, or by contacting our Data Protection Officer.

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

Under data protection legislation, individuals have a right to request access to personal information that the Trust holds about them.

If you make a request and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You also have the right to:

- have your personal data rectified if it is inaccurate or incomplete
- request the deletion or removal of personal data where there is no compelling reason for its continued processing
- restrict our processing of your personal data (i.e., permitting its storage but no further processing)
- object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

To exercise any of these rights, please contact our Data Protection Officer.

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office (ICO) at [Information Commissioner's Office](#).

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the How Government uses your data section of this notice.

### **Withdrawal of consent and the right to lodge a complaint**

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting our Data Protection Officer.

Spring 2023

## Last Updated

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 March 2023.

## Contact us

If you have any questions, concerns or would like more information about anything mentioned in this Privacy Notice, please contact our **Data Protection Officer**: Karen Wilson  
Email: karenwilson@compassacademytrust.org

## How government uses your data

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.

## Data collection requirements

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.

## How to find out what personal information the Department for Education (DfE) hold about you

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 (SAR). 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 DfE: <https://www.gov.uk/contact-dfe>

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