



PETERBOROUGH KEYS
ACADEMIES TRUST

PRIVACY NOTICE – MEMBERS, TRUSTEES AND GOVERNORS

Version 1.0

July 2023

Trustee Committee: Finance, Audit and Risk Committee

Date Policy Reviewed: June 2023

Date of Next Review: June 2025

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1. Introduction

- 1.1 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' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.
- 1.2 This privacy notice explains how we collect, store and use personal data about individuals involved in the governance of the Trust.
- 1.3 We, Peterborough Keys Academies Trust ('PKAT'), are the 'data controller' for the purposes of data protection law.

2. The Categories of Governance Information That We Process Include:

- 2.1 We process data relating to those involved in governance at PKAT. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:
 - (a) Contact details
 - (b) References
 - (c) Evidence of qualifications
 - (d) Employment details
 - (e) Information about business and pecuniary interests personal identifiers, contacts and characteristics (such as name, date of birth, contact details and postcode)
 - (f) governance details (such as role, start and end dates and governor ID)
- 2.2 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):
 - (a) Race, ethnicity, religious beliefs, sexual orientation and political opinions
 - (b) Disability and access requirements

3. Why We Collect and Use Governance Information

- 3.1 The purpose of processing this data is to support the Trust to:
 - (a) Establish and maintain effective governance

- (b) Meet statutory obligations for publishing and sharing Member / Trustee / Governor details
 - (c) Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
 - (d) • Undertake equalities monitoring
 - (e) • Ensure that appropriate access arrangements can be provided for individuals who require them
- 3.2 Under the UK General Data Protection Regulation (UK GDPR), the legal bases we rely on for processing personal information for general purposes are:
- (a) for the purpose **b)** named above in accordance with the legal basis of **Legal Obligation**
- 3.3 All Academy Trusts, under the [Academies Financial Handbook](#) have a legal duty to provide the governance information as detailed above.
- 3.4 We process criminal offence data under Article 10 of the UK GDPR.
- 3.5 Our Data Protection Policy highlights the conditions for processing in Schedule 1 of the Data Protection Act 2018 that we process Special Category and Criminal Offence data under.
- 3.6 Where you have given us consent to do so, PKAT may send you marketing information by email or text promoting school or Trust events, campaigns, charitable causes or services that may be of interest to you. You can withdraw consent or 'opt out' of receiving these texts and/or emails at any time by contacting our data protection officer.
- 3.7 We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:
- (a) Comply with a legal obligation
 - (b) Carry out a task in the public interest
- 3.8 Less commonly, we may also use personal information about you where:
- (a) You have given us consent to use it in a certain way
 - (b) We need to protect your vital interests (or someone else's interests)
 - (c) We have legitimate interests in processing the data
- 3.9 Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

- 3.10 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.

4. Collecting Governance Information

- 4.1 Governance 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.

5. Storing Governance Information

- 5.1 In accordance with the PKAT Data Protection Policy, we will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage.
- 5.2 When your relationship with the Trust has ended, we will retain your personal information for six months, after which it will be disposed of securely.

6. Who We Share Governance Information With

- 6.1 We routinely share this information with:
- (a) our local authority (where applicable)
 - (b) the Department for Education (DfE)
- 6.2 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.
- 6.3 Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:
- (a) Government departments or agencies – to meet our legal obligations to share information about members/governors/trustees
 - (b) Suppliers and service providers – to enable them to provide the service we have contracted them for, such as governor/trustee support
 - (c) Professional advisers and consultants
 - (d) Employment and recruitment agencies
 - (e) Police forces, courts
- 6.4 Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

6.5 Department for Education (DfE)

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:

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](#)

7. Requesting Access To Your Personal Data

7.1 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 gdpr@pkat.co.uk

7.2 Depending on the lawful basis used for processing data (as identified above), you may also have the right to:

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

7.3 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 at <https://ico.org.uk/concerns/>

7.4 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.

8. Withdrawal of Consent and The Right to Lodge A Complaint

8.1 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 gdpr@pkat.co.uk

9. Contact

9.1 If you would like to discuss anything in this privacy notice, please contact:
gdpr@pkat.co.uk

10. Version History

10.1 Table of Versions

| VERSION | ACTION | RESPONSIBLE | DATE |
|---------|--|---------------|------------|
| 1.0 | Privacy notice updated with new DPO introduction | Howard NELSON | 29/06/2023 |
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