Governance Data Protection Privacy Notice

Published: May 2025

Under data protection law (UK GDPR and Data Protection Act 2018), individuals have a right to be informed about how the school uses any personal data that 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.

This privacy notice explains how we collect, store and use personal data about members, trustees and stakeholder representatives ("governance volunteers").

Think Differently Education Trust, James Brindley School, Bell Barn Road, Edgbaston Birmingham B15 2AF, is the 'data controller' for the purposes of data protection law. The Trust is registered with the ICO, reference number Z519817X.

Our data protection officer is Kevin Biggs (see 'Contact us' below).

The personal data we hold, why we use this data and the lawful basis for processing

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

Data we collect	**Why we use this data**	**Lawful basis for using this data**
Name, address, contact details, date of birth, nationality, occupation, date of election/appointment, role held and resignation	Companies House registers DfE Get Information about Schools (GIAS) Administrative contact including the local authority	Public task to fulfil legal and statutory duties
Identification documents (including photo)	DBS Checks, Money Laundering checks	Public task to fulfil legal and statutory duties
Pecuniary and other interests Gifts and hospitality received Meeting attendance	Maintenance of statutory registers	Public task
Bank details	Process petty cash claims	Contract

Collecting this information

While the majority of information we collect about members, trustees and stakeholder representatives is mandatory, there is some information that can be provided voluntarily.

How we store this data

We keep personal information about governance volunteers in line with our Data Protection Policy and our Data Retention Policy.

The trust uses the Information and Records Management Society's toolkit for academies to determine how long information is retained for.

Data sharing

We do not share information about governance volunteers with any third party without consent unless the law allows us to do so.

Addresses are not made available to the public on Companies House. GIAS requires a postcode.

The pecuniary and other interests register, and the attendance register are published on the website in accordance with the Academies Trust Handbook.

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

- *The local authority – to enable flow of governance information*
- *The Department for Education (DfE) – to meet our legal duties to share certain information with it (GIAS). See appendix 1 for how the government uses your data.*
- *Companies House – to meet our legal duties as a company limited by guarantee*
- *Our auditors – to ensure we are fulfilling our legal obligations associated with financial regulations*
- *Professional advisers and consultants – to ensure that the school effectively quality assures governance*
- *Suppliers and service providers – so that they can provide the services we have contracted them for. These providers then become a data processor.*

Data Processor	**The service provided**	**Applies to**
National Governance Association	Governance advice and publications	Members, Trustees, Stakeholder Representatives
Learning Link	On-line training provider	Members, Trustees, Stakeholder Representatives
Microsoft Office 365	Cloud based IT platform that enables on-line meetings and document storage	Members, Trustees, Stakeholder Representatives
Cleverbox	Website host	Members, Trustees, Stakeholder Representatives
HCSS	Processing of expenses claims	Members, Trustees, Stakeholder Representatives
Local Authority	On-line training provider	Members, Trustees, Stakeholder Representatives
DfE	Public accountability and governance advice	Members and Trustees
Companies House	Public accountability (Companies Act 2006)	Trustees
Hacker Young	Audit	Members, Trustees

Transferring data internationally

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.

Parents and pupils' rights regarding personal data

All individuals have a right to make a **'data subject access request'** to gain access to personal information that the trust holds about them.

If a data subject access request is made, and if we do hold information about the data subject, we will:

- Give a description of it

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

Individuals also have the right for their personal information to be transmitted electronically to other organisations in certain circumstances.

If you would like to make a request, please contact our data protection officer.

Other rights

Under data protection law (UK GDPR and Data Protection Act 20218), individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at https://ico.org.uk/concerns/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

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:

Kevin Biggs (dpo@jamesbrindley.org.uk), Data Protection Officer, Head Office, Bell Barn Road, Edgbaston, Birmingham B15 2AF

Appendix 1 – How the 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 (DSI) 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