



**Aston Community
Education Trust**

ACET

Governance

Privacy Notice

(How we use governor information)

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

DATE: March 2025

POLICY LEAD: Data Protection Officer



Excellence



Equity



Empowerment



Esteem

Privacy notice (how we use personal information on Get Information about Schools (GIAS))

Aston Community Education Trust is a “data controller.” This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

The categories of governance information that we process include:

- Personal identifiers, contacts and characteristics (such as name, date of birth, contact details and postcode)
- Governance details (such as role, start and end dates and governor ID)
- Contact information (such as telephone numbers, email addresses and telephone numbers)
- Details of qualifications, skills, and experience - for skills audit purposes;
- Information about your business or pecuniary interests
- Bank account details - for reimbursement of expenses
- Details of your appointment, including the appointing body, the date of appointment and term of office
- Training attended in your role as a governor
- Equal opportunities monitoring information – eg. ethnic origin, sexual orientation, health and religion or belief (where this has been provided)
- Photographs – for internal safeguarding and security purposes, school newsletters, media and promotional purposes)
- Images captured by the academy CCTV system

We may also hold personal data about you from third parties, such as information supplied by the appointing body and from the Disclosure & Barring Service, in order to comply with our legal obligations and statutory guidance.

Why we collect and use governance information

The personal data collected is essential, in order for the academy or academy trust 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
- facilitate safer recruitment (e.g. by carrying out criminal records checks)
- to enable you to serve as a governor and for us to communicate with you.
- to comply with our statutory safeguarding obligations
- to ensure we comply with our Instrument of Governance
- to support effective governor development
- to support effective management of the school
- to comply with statutory reporting to the Department for Education (DfE)
- photographic images for identification purposes (safeguarding and identifying Governors to our parents and pupils), and celebration purposes (to record school events)

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

- Article 6(a) – Your consent (for any processing which does not fall into the other bases explained below

- Article 6(c) - Compliance and with our legal obligations
- Article 6(e) – Carrying out tasks in the Public Interest.

All academy trusts, under the academy trust handbook <https://www.gov.uk/guidance/academy-trust-handbook>, have a legal duty to provide the governance information as detailed above.

For special category data, we also rely on the following conditions under Article 9 of the UK GDPR:

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations in line with our data protection policy;
- Where it is needed in the public interest, such as for equal opportunities monitoring

Collecting governance information

We collect personal information via:

- Trustee and governor application forms
- Trustee and governor information added into our governance platform, GovernorHub.
- DBS form
- Record of business interests form

Governance roles data is essential for the, academy and academy 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.

Storing governance information

We store workforce information securely on the School’s IT network. Aston Community Education Trust (ACET) store data either on school owned servers or hosted in Microsoft Office 365. Secure storage is provided for paper-based records. We only keep the information for the length of time we need it for, as shown in our data retention schedule. For more information on our data retention schedule, please visit www.astoncetrust.org. We dispose of personal information securely when we no longer need it.

Who we share governance information with

We routinely share this information with:

- our local authority (where applicable)
- the Department for Education (DfE)
- Our Governing Body
- The Disclosure and Barring Service
- Our school community (via the school website)
- Our Governance Application; GovernorHub
- Our Clerking service; Attingham Education

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.

Department for Education (DfE)

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 Section 538 of the Education Act 1996.

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](#).

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

For more information, please see the '[How Government uses your data](#)' section.

Requesting access to your personal data

The UK GDPR gives you certain rights about how your information is collected and used. To make a request for your personal information, contact datacontroller@astoncetrust.org.

Your rights include:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'.
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances.
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to [complain to the Information Commissioner](#) if you feel we have not used your information in the right way.

There are legitimate reasons why your information rights request may be refused. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.

If you have a concern 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 [raise a concern with ICO](#)

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 datacontroller@astonctrust.org.

Contact

If you would like to discuss anything in this privacy notice, please contact: datacontroller@astonctrust.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 (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>

or

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

To contact DfE: <https://www.gov.uk/contact-dfe>