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# PRIVACY NOTICE FOR MEMBERS, TRUSTEES AND LOCAL GOVERNORS

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Approved By	Trust Board
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## 1. Introduction

Under data protection law, individuals have a right to be informed about how the Trust 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 for Members, Trustees and Local Governors.

We, Cranmer Education Trust, are the 'data controller' for the purposes of data protection law.

## 2. The Personal Data We Hold

We process data relating to those we employ, or otherwise engage, to work at our schools. Personal data that we may collect, use, store, and share (when appropriate) about you includes, but is not restricted to:

- Contact details:
- Name, date of birth, postal address, email address, telephone number
- Governance details (such as role, start and end dates, skills, and experience)
- Recruitment information, including a CV or cover letter or as part of the application process
- Your business interests
- Your bank details for expense payment purposes

We may also collect, store, and use information about you that falls into "special categories" of more sensitive personal data. We only process special categories data when essential, and where permitted by law, such as fulfilling health and safety obligations or for safeguarding requirements.

This includes information about (where applicable):

- Protected characteristics as per equality legislation

## 3. Why we collect this Data

The purpose of processing this data is to help us run the Trust, including to:

- Meet the statutory duties as a Multi Academy Trust in both Charities and Company Law
- Facilitate safe recruitment of Trustees and Local Governors
- Enable monitoring of protected characteristics
- To pay expenses where applicable

## 4. Our Lawful Basis for using this Data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

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

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way (e.g., protected characteristics)
- We need to protect your vital interests (or someone else's interests)

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.

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

## 5. Collecting this Information

While most of information we collect from you is mandatory, there is some information that you can choose whether to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

## 6. How we store this Data

We create and maintain an electronic file for Members, Trustees and Local Governor contact details. The information contained in this file is kept secure and is only used for purposes directly relevant to your role as a Member, Trustee or Local Governor.

We use GovernorHub, a cloud-based tool, as a storage and communication mechanism. We enter into a contract with this organisation who give us assurances, as a data processor. The trust is the account holder (as data controller) and can configure the permissions required to view content stored in the GovernorHub product.

If you subscribe to other services that the GovernorHub portal offers, GovernorHub become the data controller and they may use your information to provide you with services, information, and marketing. You have a number of rights in relation to the information that GovernorHub hold about you. You can exercise your rights by contacting them at [dataprotection@governorhub.com](mailto:dataprotection@governorhub.com).

Once your term of office has ended, we will retain your information in accordance with our record retention schedule.

A copy of our data retention schedule is available on request.

## 7. Data Sharing

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:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- The Department for Education (DfE) - we are required to share information about our governors with the (DfE) under the requirements set out in the Academies Financial Handbook . All data is entered manually on the GIAS system and held by DfE under a combination of software and hardware controls which meet the current government security policy framework.
- GovernorHub

- Ofsted
- Payroll provider (for paying expenses)
- Our auditors
- Training providers (e.g., NGA, Trust GS)

## 8. 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.

## 9. Your rights

### 9.1 How to access personal information we hold about you

Individuals have a right to make a **‘subject access request’** to gain access to personal information that the school holds about them.

If you make a subject access 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

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact [info@cranmeredt.org](mailto:info@cranmeredt.org)

### 9.2 Artificial Intelligence

If we ever propose to make decisions about you using only automated systems (like AI), we will explain this to you.

Automated decisions are always subject to human involvement and overview.

### 9.3 Your other rights over your data

Under data protection law, 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, e.g., AI, 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 the trust Director of Operations on [cellis@cranmeredt.org](mailto:cellis@cranmeredt.org)

## 10. 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. The DPO contact is 'Veritau Schools DPO Service' who fulfil the statutory role of the DPO. They are the Trust's key liaison point for the Information Commissioner's Office. They are an independent adviser to the Trust on compliance with data protection legislation, individual rights, data security and breach handling policies.

Veritau's help desk operates from 9:00 – 17:00 on Monday to Thursday and 9:00 – 16:30 on Fridays

E-mail: [schoolsDPO@veritau.co.uk](mailto:schoolsDPO@veritau.co.uk)

Tel: 01904 554 025.

Alternatively, you can seek advice directly from the Information Commissioner's Office:

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